

# Broadband Equity, Access, and Deployment (BEAD) Program Overview and Status Update

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Indiana Broadband Office



## Agenda

Policy Notice Changes

Technology Neutrality

Restructured Subgrantee Selection

Post-Submission Information

Resources

Q&A



# **BEAD SUBGRANTEE SELECTION**

## **Policy Notice Overview:**

**A review of significant program modifications in the BEAD NOFO & NTIA Policy Notice**

# Changes to Regulatory Requirements

- NITA's BEAD Restructuring Policy Notice (PN) eliminates several non-statutory requirements previously outlined in the BEAD NOFO.
- States are **prohibited** from imposing any obligations removed by the PN on subgrantees or in application scoring, subgrantee agreements, and subgrantee reporting.
  - *This means the Indiana Broadband Office (IBO) must strictly adhere to the guidance updates in the Restructuring Policy Notice and apply changes to Indiana's BEAD Program where necessary.*

# BEAD Timeline Update

## Policy Notice Compliance Timelines

Important Timeline Update	Notes
<p>States have 90 calendar days from the release of the PN to:</p> <ul style="list-style-type: none"><li>• Comply with its obligations</li><li>• Submit a Final Proposal to NTIA</li></ul> <p>NTIA will complete its Final Proposal review within 90 calendar days of submission.</p>	<p>This 90-day deadline replaces extensions previously granted in the Final Proposal Deadline Requirements Programmatic Waiver. The 90-day deadline is Sept. 4, 2025.</p>



# Labor, Employment, and Workforce Development Requirements

Removed NOFO Sections	Policy Notice Impacts
<ul style="list-style-type: none"><li>• IV.C.1.e-g<ul style="list-style-type: none"><li>• Labor, workforce, civil rights, and nondiscrimination</li></ul></li><li>• IV.B.5.b.11-13 (IP requirements)</li><li>• IV.B.9.b.11.b-c (FP requirements)</li><li>• VII.E.2.9.12.a-b (Reporting requirements)</li><li>• VII.D.7<ul style="list-style-type: none"><li>• Contracting with minority, women owned and labor surplus firms</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Removes requirements in these sections, except the IIJA requirement for subgrantees to comply with federal labor and employment laws</li><li>• Applicants are only required to certify they comply with all federal labor and employment laws</li></ul>

**States must comply with 2 C.F.R §200.321, which outlines rules regarding contracting with specific entities, such as minority and veteran-owned businesses.**

# Climate Resiliency Requirements

Removed NOFO Sections	Policy Notice Impacts
<ul style="list-style-type: none"><li>• IV.C.1.h - Climate Resilience<ul style="list-style-type: none"><li>• Describes IBOs' obligations to conduct climate related analyses and encourages engagement with NOAA for weather or climate analysis</li></ul></li><li>• IV. B. 5. b. 15 (IP Requirements)</li><li>• IV. B. 9. b. 11.e (FP Requirements)</li></ul>	<ul style="list-style-type: none"><li>• Removes all IBO and subgrantee requirements in these sections</li><li>• Acknowledges that subgrantees can meet the IIJA requirement to 'incorporate best practices defined by NTIA for ensuring reliability and resilience of broadband infrastructure' by...<ul style="list-style-type: none"><li>• Establishing risk management plans that account for technology infrastructure reliability and resilience</li><li>• In other words, complying with the Cybersecurity and Supply Chain Risk Management” section of the NOFO (IV.C.2.c.vi).</li></ul></li></ul>

# Open Access and Net Neutrality

Removed NOFO Sections	Policy Notice Impacts
<ul style="list-style-type: none"><li>• IV.C.2.b.ii - Conduit Access Points<ul style="list-style-type: none"><li>• Requires applicants to provide regular conduit access points and a reasonable amount of excess capacity in applications</li></ul></li><li>• V.C.2.c.ii - Consumer Protections<ul style="list-style-type: none"><li>• Describes a prohibition on data caps and unjust or unreasonable network management practices</li></ul></li><li>• IV.C.2.c.v - Interconnection Requirements &amp; Wholesale Access<ul style="list-style-type: none"><li>• Required subgrantees to let other ISPs connect to BEAD-funding Middle Mile</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Scales back requirements in IV.C.2.b.ii:<ul style="list-style-type: none"><li>• "Any project that involves laying fiber optic cables or conduit underground or along a roadway, shall include interspersed conduit access points at regular and short intervals."</li></ul></li><li>• Removes requirements in:<ul style="list-style-type: none"><li>• IV.C.2.c.ii (Consumer Protections)</li><li>• IV.C.2.c.v (Interconnection Requirements and Wholesale Access)</li></ul></li></ul>

# Local Coordination and Stakeholder Engagement

Removed NOFO Sections	Policy Notice Impacts
<ul style="list-style-type: none"><li>• IV.C.1.c - Local Coordination<ul style="list-style-type: none"><li>• Requires IBO to develop, execute, and report local coordination approaches; describes NTIA evaluation of approach</li></ul></li><li>• IV.C.2.c.iv - Public Notice<ul style="list-style-type: none"><li>• Requires subgrantees to carry out public awareness campaigns</li></ul></li><li>• IV.B.5.b.4 (IP Requirements)</li><li>• IV.B.9.b.5 (FP Requirements)</li></ul>	<ul style="list-style-type: none"><li>• Removes all IBO and subgrantee requirements in these NOFO sections</li><li>• The IBO can meet the statutory requirement to adopt local coordination requirements established by NTIA by certifying in the Final Proposal that they:<ul style="list-style-type: none"><li>• Observed the FP public comment requirements in the FP Guidance</li><li>• Received plans submitted by political subdivisions up until submission of the Final Proposal to NTIA</li></ul></li></ul>

# Non-Traditional Broadband Providers

Removed NOFO Sections	Policy Notice Impacts
<ul style="list-style-type: none"><li>• IV.C.1.a. - Consider All Provider Types<ul style="list-style-type: none"><li>• Describes how IBO may not exclude any provider type and how to navigate SGS if conflicting state laws exist</li></ul></li><li>• IV.B.5.b.18 (IP Requirements)</li><li>• IV.B.9.b.10 (FP Requirements)</li></ul>	<ul style="list-style-type: none"><li>• Removes all IBO and subgrantee requirements in these NOFO sections</li><li>• Clarifies the IBO must still comply with IIJA requirement, that it "may not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for such grant funds"</li></ul>

# Middle Class Affordability Plan

Removed NOFO Sections	Policy Notice Impacts
<ul style="list-style-type: none"><li>IV.C.2.c.i - Affordability &amp; Low-Cost Plans<ul style="list-style-type: none"><li>Outlines that IBO are required to submit a plan focused on middle-class affordability</li></ul></li></ul>	<ul style="list-style-type: none"><li>Removes all the IBO and subgrantee requirements associated with middle-class affordability, including requirements to develop, implement, and provide updates on the plan</li></ul>

# Low-Cost Service Option

Removed NOFO Sections	Policy Notice Impacts
<ul style="list-style-type: none"><li>• IV.C.2.c.i - Affordability &amp; Low-Cost Plans<ul style="list-style-type: none"><li>• Requires IBO to propose a definition of "low-cost broadband service option" (LCSO) and submit it for approval in the Initial Proposal</li><li>• Requires applicants to offer at least one LCSO in alignment with the approved definition for eligible subscribers</li></ul></li><li>• IV.B.5.b.16 (IP Requirements)</li><li>• IV.B.9.b.11.d (FP Requirements)</li></ul>	<ul style="list-style-type: none"><li>• Removes the IBO and subgrantee requirements in these sections</li><li>• Updates requirement; applicants must propose a LCSO for eligible subscribers<ul style="list-style-type: none"><li>• LCSO must offer at least 100/20 Mbps with latency measurements of no more than 100 milliseconds</li><li>• If applicable, applicants may offer existing low-cost plan as BEAD LCSO</li></ul></li><li>• Updates definition of "eligible subscriber"<ul style="list-style-type: none"><li>• Households that are eligible to enroll in the FCC Lifeline Program</li></ul></li></ul>

# Impact of Regulatory Requirement Changes on Indiana BEAD Program

- The following requirements will be removed or modified in the BEAD application process:
  - Labor, Employment, and Workforce Development Requirements\* (see slide #5)
  - Climate Resiliency Requirements (see slide #6)
  - Open Access and Net Neutrality (see slide #7)\*\*
  - Local Coordination and Stakeholder Engagement (see slide #8)
  - Non-Traditional Broadband Providers (see slide #9)\*\*
  - Middle Class Affordability Plan (see slide #10)
  - Low-Cost Service Option (see slide #11)\*\*\*
- Costs associated with the above removed sections will be prohibited in subgrantee budgets.

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\*Subgrantees must still attest to compliance with federal labor and employment laws

\*\*Modified IBO requirements still apply

\*\*\*Subgrantees must still offer a LCSO under the modified definition

# Technology Neutrality Overview

- To align with NTIA's Policy Notice guidance, the IBO must rescind all preliminary subawards made during Round 1 of the Subgrantee Selection Process to allow all technology types that meet BEAD technical standards to apply on the same terms, to serve any BEAD-eligible BSL.
  - This update refers to the inclusion of ULFW and LEO technologies.
- All BEAD-eligible BSLs must be reopened for bidding during an additional subgrantee selection application round – the Benefit of the Bargain Round.
- Additionally, all technology applicant types can now seek to have their application considered a "Priority Broadband Project".



# Priority and Non-Priority Projects



## Priority Broadband Projects

A **Priority Broadband Project** is one that delivers speeds of at least **100/20 Mbps**, latency of **100 milliseconds or less**, and can **easily scale to meet future connectivity demands**, such as multi-gigabit service or 5G support.



## Non-Priority Broadband Projects

A “non-priority” proposal would offer service at or above 100/20 Mbps and latency less than or equal to 100 milliseconds, but could not necessarily meet the statutory scalability requirements in 47 U.S.C.

# 3.1 Priority Broadband Projects (PBP)

## 'Fiber Preference' Eliminated

### Former NOFO Definition

The term “Priority Broadband Project” means a project that will provision service via end-to-end fiber-optic facilities to each end-user premises.

### Policy Notice Definition

The term “Priority Broadband Project” means a project that: (1) provides broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; (2) has a latency less than or equal to 100 ms; (3) can easily scale speeds over time to meet the evolving connectivity needs of households and businesses; and (4) supports the deployment of 5G, successor wireless technologies, and other advanced services.

## Policy Notice Update

- Any applicant may ask for its proposal to be treated as a PBP, regardless of technology type, if it meets all technical requirements and provides supporting documentation for the IBO to assess that the network meets the IIJA PBP standard
- The IBO will determine if the proposal is a PBP, but cannot categorically exclude any technology type
- PBP eligibility must be considered per project area

## 3.2 Technologies Eligible for Participation

NOFO Technology Structure	Policy Notice Updates
<ul style="list-style-type: none"><li>• Reliable Broadband Technologies (RBS)<ul style="list-style-type: none"><li>• Fiber optic (Priority Broadband Projects)</li><li>• Coax/hybrid fiber-coax</li><li>• DSL</li><li>• Terrestrial fixed wireless<ul style="list-style-type: none"><li>• Licensed &amp; Licensed by Rule (including Hybrid)</li></ul></li></ul></li><li>• Alternative Technologies (Alt Tech)<ul style="list-style-type: none"><li>• ULFW</li><li>• LEO Satellite</li><li>• Other</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Removes the distinction between fiber, other RBS, and Alt Tech; all qualifying technologies apply on the same terms</li><li>• Allows any applicant to request Priority Broadband status for any project proposal</li><li>• Requires ULFW providers to demonstrate that they have taken the steps necessary to resolve interference and capacity constraints associated with the technology</li><li>• Rescinds the Alternative Technology and Selecting Technology Policy Notices</li></ul>



# **BEAD SUBGRANTEE SELECTION**

## **Restructured Subgrantee Selection**

# Pre-Qualification Process

- Internet service providers who participated in the initial pre-qualification process do not need to requalify, but ISPs who **did not** pre-qualify in the initial window may resubmit for consideration.
  - The pre-qualification application requirements have not been altered by the BEAD Restructuring Policy Notice.
- Pre-qualification applications opened this morning at 9:00 AM and will remain open through the final day of the Benefit of the Bargain Round.
  - ISP organizations who have **not** previously completed the registration process must register for the process on [ConnectingIndiana.com](https://ConnectingIndiana.com).
  - *Note: if your organization does not become pre-qualified before the final day of the Benefit of the Bargain window, the IBO cannot guarantee your application will be reviewed in time to participate.*

# Subgrantee Selection Timeline

## Benefit of the Bargain Round – July 10 – 21 (Tentative)

- **Will tentatively open July 10th and remain open for 11 calendar days.**
- Round will close on July 21<sup>st</sup> at 11:59 pm.
- Indiana will be re-utilizing the previously awarded Round 1 project areas in the new Benefit of the Bargain Round.

## Round 2 - TBD

- Given the expedited timeline, expect 2 weeks between rounds. Dates will be announced closer to the time.
- Round 2 will consist of any remaining locations from the restructured Round 1 and project areas will be determined again by the IBO.

## Round 3 - TBD

- Round 3 will take place only if needed after the first two rounds.
- Expect Round 3 to be short (perhaps only a couple of days of open applications)

## Finalize and Submit to NTIA

- All selection, documentation, meetings, the Final Proposal, and public comment must be completed and ready to submit to the NTIA by September 4, 2025.

## 3.3 The Benefit of the Bargain Round (Subgrantee Selection)

### Understanding the Benefit of the Bargain Round

- The IBO will conduct a "Benefit of the Bargain Round" for every BEAD-eligible BSL.
- During this (and all future rounds), all applicants, regardless of technology type or prior participation in the program, are allowed to apply and compete for BEAD funding awards.



# Project Area Selection Overview

- Applicants will have the opportunity to bid on project areas that have been pre-determined by the IBO.
- Applicants can also add served locations, up to 20% of the total locations in their project area.
  - Any proposed served locations will be submitted as a .csv attachment in the portal.
- Additionally, during the application process, ISPs can remove locations they deem excessive in cost from project areas. The IBO has no input on this cost threshold; applicants will determine the cost of the locations themselves.

## 3.3 The Benefit of the Bargain Round (Subgrantee Selection)

### Understanding the Benefit of the Bargain Round

- The application process still requires the statutory documentation to demonstrate the applicant's readiness and capability to facilitate a BEAD project, if awarded.
- Applicants who applied **and were preliminarily awarded** a project during Round 1 have two options for participating in the BOTB Round:
  - *Utilize Previous Applications or;*
  - *Submit a Net New Application*
- All other applicants must submit a new application(s).

# Updated Scoring Rubric Requirements

- The NTIA has pivoted to a "cost-first" evaluation standard.
- NTIA now requires that all BEAD subgrantee applications be scored with "lowest BEAD cost per BSL" as the primary and determinative criterion. Other factors (e.g., speed, reliability, deployment timeline) may only be considered if proposals are within 15% of each other in cost per BSL. **What this means for applicants:**
  - No points or preferences may be awarded for:
    - Technology type (e.g., fiber)
    - Labor practices, affordability, or diverse business enterprise criteria
    - Any requirement not explicitly found in the IIJA statute

# Updated Scoring Rubric

Priority  
BEAD  
Projects

Primary Scoring Criteria	Secondary Scoring Criteria
<ul style="list-style-type: none"><li>• <b>Minimal BEAD Program Outlay</b><ul style="list-style-type: none"><li>• In deciding among competing applications covering the same general project areas, Eligible Entities must choose the option with the lowest cost based on minimal BEAD Program outlay.</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Can <b>only</b> be considered if an application to serve the same general project area proposes a project cost within 15% of the lowest-cost proposal received on a per BSL basis. <u>Criteria are:</u><ul style="list-style-type: none"><li>• Speed to Deployment</li><li>• Speed of Network and Other Technical Capabilities</li><li>• Preliminary/Provisional Subgrantee</li></ul></li></ul>

# Updated Scoring Rubric

## Non-Priority BEAD Projects

- Non-priority broadband projects will **only** be considered if:
  - The IBO determines that no other proposal meets the definition of a Priority Broadband Project, and;
  - The non-priority broadband project meets the speed and latency requirements of the statute and NOFO.

# Primary Scoring Process

- When comparing competing proposals, the IBO will:
  - Assess the total BEAD funding that will be required to complete the project (i.e., the total project cost minus the applicant's proposed match) and;
  - The cost to the Program per location (i.e., the total BEAD funding that will be required to complete the project divided by the number of BSLs the project will serve).



# Secondary Scoring Process (Dependent)

- If an application to serve the same general project area proposes a project cost within 15% of the lowest-cost proposal received for that same general project area on a per BSL basis, the IBO will evaluate competing applications based on the following three criteria with the relative weighting at the discretion of the IBO:
  - **Speed to Deployment:** Greater consideration can be awarded to prospective subgrantees promising an earlier service provision date.
  - **Speed of Network and Other Technical Capabilities:** The IBO has the ability to weigh the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.
  - **Preliminary/Provisional Subgrantees:** For locations where the IBO has already identified preliminary selected subgrantees, additional weight may be added to applications in the Benefit of the Bargain Round.



# **BEAD SUBGRANTEE SELECTION**

Post-Submission Information

# Award Announcements




The IBO will utilize the updated scoring rubric for all applications after each round concludes.




The IBO will finalize projects and select preliminary awardees after each round.



The IBO will notify all participating providers of preliminary awards after each round. There will not be a public announcement until all rounds are complete.



After all rounds are completed, the IBO will meet with the NTIA and preliminary awards will become **provisional** awards.




Once awards are **provisional**, the IBO can announce them publicly and post its Final Proposal.



Awards only become **final** once Indiana's Final Proposal has received official approval.



# Resources

- The IBO strongly encourages internet service providers to read [NTIA's BEAD Restructuring Policy Notice](#) in its entirety to ensure alignment with BEAD Program requirements.
  - A guidance document outlining application section requirements will become available for ISPs to utilize during the subgrantee selection rounds.
  - Please remember to check the IBO website frequently for timely updates.
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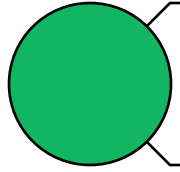
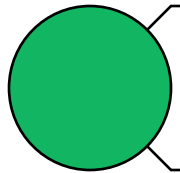
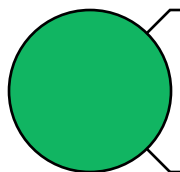
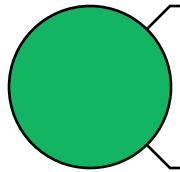
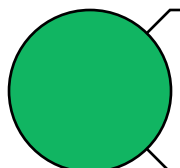
# IBO Meetings

The Indiana Broadband Office will be available to meet with ISPs during the subgrantee selection process as needed. To schedule a meeting, please email the IBO directly at [IndianaBroadband@iot.in.gov](mailto:IndianaBroadband@iot.in.gov) and a member from the IBO will work to schedule a meeting.

# Q&A Session

The IBO is always reachable at [IndianaBroadband@iot.in.gov](mailto:IndianaBroadband@iot.in.gov)

# Application Question Sections (EXTRA SLIDES)

-  Project Technical Details
-  Project Financial Details
-  Risk Management Plans
-  Business and Financial Planning
-  Technical Capability and Engineering Documents



# Project Technical Details

Speed,  
Latency, and  
Other Technical  
Capabilities

- Applicants are asked to indicate if they plan to serve all eligible locations in their project area with one technology type or multiple technology types.
- Applicants will be prompted to select which technology type(s) they will be using, using a multi-select option of the following:
  - Fiber-optic
  - Cable modem/hybrid fiber-coaxial
  - Licensed terrestrial fixed wireless
  - Unlicensed terrestrial fixed wireless
  - Low-Earth orbit satellite

# Project Technical Details

Speed,  
Latency, and  
Other Technical  
Capabilities

- Applicants are asked to disclose the latency of the broadband service to be provided for this bid for each technology type selected.
- Applications must meet the minimum BEAD speed and latency capabilities:
  - Network speeds at least 100/20
  - Latency: 100 milliseconds

# Project Area Selection

- For all rounds of subgrantee selection, applicants will bid on pre-determined project areas comprised of Census blocks.
- Applicants may also add served locations (not funded by any other funding source), up to 20% of the total locations in their project area.
  - Applicants will submit any served locations as a .csv attachment in the portal.

# Project Technical Details

Speed,  
Latency, and  
Other Technical  
Capabilities

- Applicants are asked to provide a narrative on how they will increase their organization's capacity to provide high-speed broadband as new customers are added for the project area in this bid.

# Project Technical Details

Speed to  
Deployment

- Applicants are asked to provide their planned deployment timeline in months for this bid.
  - Timelines are not allowed to span more than 48 months from the date of signing the Subaward Agreement.

# Project Technical Details

Acknowledgement  
of Financial  
Penalties

- Applicants must certify their acknowledgment, via checkbox, that potential penalties exist if their project extends beyond the planned timeline without formal extension request and approval.
- Applicants must certify their acknowledgment, via checkbox, that the final subgrant agreement will include enforceable penalties for non-performance of final commitments.

# Project Financial Details

BEAD Outlay and  
Matching Funds

- Applicants must enter the following dollar amounts:
  - The total amount of BEAD subsidy funds requested for the project area
  - The total amount of matching funds the organization will provide for the project area
- As required by the BEAD Notice of Funding, providers must contribute *at minimum 25%* of the total project costs.

# Project Financial Details

## Budget Breakdown

- Applicants are asked to provide a detailed budget and accompanying narrative document explaining the planning and financial needs that might arise during the implementation of a project area. The detailed budget should include line items such as:
  - Administrative and legal expenses, structure, permitting, planning, maintenance, engineering, project inspection, site work, employees, equipment, miscellaneous expenses

# Project Financial Details

Affordability

- Applicants are required to submit their planned total monthly cost to the consumer, inclusive of all taxes, fees, and charges.
  - The monthly cost should be for a 100/20 Mbps plan.

# Risk Management Plans

- If not previously submitted during pre-qualification, applicants will be required to upload the following documents:
  - Cybersecurity risk management plan; and
  - Supply chain risk management plan.



# Business and Financial Planning

- As required by the NTIA, all applicants must submit business plans and related analyses to substantiate the sustainability of the proposed project area.
  - Documents can include a pro forma statement or other analyses, but must include cash flow and balance sheet projections and at least three years of operating cost and cash flow projects post-completion of the project



# Business and Financial Planning

- For all technologies *other than LEO providers*, applicants must submit a letter of credit or a letter guaranteeing a performance bond.
  - The letter of credit must be at least 25% of the subsidy amount.
- **OR**
  - The performance bond must be at least 100% of the subsidy amount.
- An example letter of credit is available for applicants on the IBO website.
- The NTIA has also established letter of credit waiver guidance ([available here](#)). If your organization has interest in pursuing any waiver options, you must discuss with the Indiana Broadband Office in advance of your application submission.

# Business and Financial Planning

- For *LEO providers only*, applicants must submit a letter of credit or a letter guaranteeing a performance bond.
  - The letter of credit must be at least 50% of the subsidy amount.
- **OR**
- The performance bond must be at least 100% of the subsidy amount.
- An example letter of credit is available for applicants on the IBO website.

# Technical Capability

- Applicants will submit the following documents:
  - A network design and diagram
  - Detailed project costs
  - Build-out timeline and milestones for project implementation
  - A capital investment schedule evidencing complete build-out within four years.
- All of the above materials must be certified by a professional engineer who states that the proposed network can deliver broadband service that meets all performance needs to all locations in the project area.

