

**OKLAHOMA BROADBAND OFFICE (OBO)**  
**BEAD PROGRAM AGENCY POLICY DOCUMENTATION**  
*(Reimbursement, Disbursement, Clawbacks, and Reporting Requirements)*

1. Funding Disbursement Policy for Deployment Projects

The Oklahoma Broadband Office (OBO) will distribute BEAD program funds to subgrantees through either:

- Performance indicated reimbursement fixed-amount subawards, or
- Fixed-amount subawards based on performance milestones (e.g., unit built, milestone met, or project complete)

The choice of disbursement structure will be determined by OBO based on project scope, risk assessment, and the subgrantee's financial capacity. This will occur prior to the execution of the grant agreement.

a. Reimbursement Fixed-Amount Awards

- Subgrantees may submit reimbursement requests on a monthly or quarterly basis, as outlined in their grant agreement.
- Reimbursement requests must include:
  - Invoices and supporting documentation
  - PE certified progress reports
  - Photographic or geospatial evidence of work performed
- OBO will issue reimbursement payments within 45 days of receipt and approval of complete and compliant reimbursement packages.
- Once projects have completed a certain performance indicator, the subrecipient will be required to provide a reimbursement request. This is meant to encourage consistent cash-flow

b. Fixed-Amount Subawards

For fixed-amount agreements, funds will be disbursed based on the following project milestones:

<b>Milestone Type</b>	<b>Example</b>	<b>Disbursement %</b>
Project Mobilization	Execution of agreement and start of field activities	10%
Permitting	Permitting and EHP Completed	10%
Unit Built Progress	Verified installation of broadband infrastructure (e.g., per mile or location served)	40–60% (tiered)
Substantial Completion	95% buildout completed	10%
Final Closeout	Final inspection, testing, and PE certification	10%

- Each milestone payment requires submission of documentation confirming successful progress and financial compliance.
- Disbursements are subject to OBO verification and site review.

## 2. Clawback Provisions

OBO reserves the right to withhold, suspend, or claw back funds disbursed under the BEAD Program based on performance, compliance, or financial misconduct.

### a. Grounds for Clawback or Withholding

OBO may initiate reimbursement denial or clawback proceedings for reasons including but not limited to:

- Failure to meet deployment deadlines or construction milestones
- Misuse or misallocation of BEAD funds
- Noncompliance with BEAD or NEPA requirements
- Fraudulent, misleading, or inaccurate reporting
- Failure to maintain service quality, pricing, or availability commitments

### b. Clawback Decision Authority

The authority to initiate clawback proceedings lies with the Executive Director of the Oklahoma Broadband Office, in consultation with:

- The Oklahoma Broadband Governing Board
- Legal counsel from the Oklahoma Office of the Attorney General, as needed

Final determination is made in alignment with applicable federal guidelines and Oklahoma statutes.

c. Repayment Terms

Subgrantees subject to clawback will be required to return funds within 60 days of formal notice, unless otherwise agreed in writing. OBO may pursue legal remedies in cases of non-cooperation.

3. Reporting Requirements and Cadence

Subgrantees must submit timely, accurate reporting on both programmatic and financial metrics as defined in the 2 CFR 200 and NTIA and OBO guidance and requirements.

a. Reporting Cadence

<b>Report Type</b>	<b>Frequency</b>	<b>Due Date</b>
Monthly Progress Report (MPR)	Monthly	15th of following month
Quarterly Financial Report (QFR)	Monthly or Quarterly	Within 15 days of quarter close
Environmental Compliance	As milestones are completed	Ongoing
Final Closeout Report	Once, at project completion	Within 45 days of completion

All reports must be submitted via the Oklahoma Broadband Grant Portal or another approved platform.

b. Required Report Contents

- % of project completion
- Miles of fiber installed (if applicable)
- Locations passed now considered served

- Percentage of current subscribers based on awarded total BSLs
- Permitting, Environmental and NEPA updates
- Budget-to-actual expenditures
- Procurement data (including Buy America compliance)
- Any incidents, damages, risks, or delays

The Oklahoma Broadband Office and NTIA reserve the right to change, adapt, or amend reporting requirements at any time.

#### 4. Timeline for Disbursement

- Initial Mobilization: Upon project kickoff, as permitted by subaward type
- Milestone and Performance Indicator Based Payments: Disbursed within 45 business days of milestone or performance verification and documentation approval
- Final Closeout: Remaining funds disbursed after final inspection, PE certification and reporting

OBO may adjust timelines in the event of extenuating circumstances or federal guidance updates.

#### 5. Oversight and Enforcement

- All subgrants are subject to audit by OBO, the Oklahoma State Auditor and Inspector, and NTIA or federal designees
- OBO may issue Corrective Action Plans (CAPs) for subgrantees found noncompliant
- Repeated noncompliance may result in disqualification from future broadband funding opportunities and clawback provisions
- The OBO will meet on a weekly cadence with all subrecipients to ensure robust project and financial oversight
- The OBO will utilize Special Award Conditions (SACs), to ensure milestone completion as it relates to environmental clearance and tribal consultation. Subrecipients will not be able to draw funding past the initial 10% draw until these 2 SACs are completed and approved by the OBO.

- The subgrantee will install 50 fiber miles and pass 1,200 unserved homes within the designated project area. Measurable: The OBO can measure this by reviewing the subgrantee's Monthly Progress Reports (MPRs) and conducting on-site monitoring visits. The OBO's technical professionals can physically verify the fiber miles deployed and the homes passed. Achievable: This target is set based on the subgrantee's proposed project plan, budget, and timeline, which were assessed during the pre-award due diligence phase. Relevant: This target directly contributes to the overall goal of the BEAD program—deploying high-speed internet to unserved locations. Time-bound: The specific deployment must be completed within the first 12 months of the project's grant period, as outlined in the project timeline. This is just one example. The OBO's monitoring plan will use a range of SMART targets to track different aspects of a project's performance, from homes passed to budget utilization and compliance with labor standards.

## 6. Contact and Escalation

Questions regarding disbursement, reimbursement, or clawback policy should be directed to:

Oklahoma Broadband Office – Grants Management Division

Email: [bead@broadband.ok.gov](mailto:bead@broadband.ok.gov)