

OBO BEAD Monitoring Plan

The purpose of this OBO BEAD Monitoring Plan (hereafter “Monitoring Plan”) is to ensure subgrantee accountability by outlining the robust and timely compliance monitoring the OBO will perform for each BEAD awarded project. This Monitoring Plan shall commence upon preliminary subgrantee selection, shall continue with execution of each Grant Agreement, and will be implemented through the end of the federal interest period. This Monitoring Plan applies to all BEAD subgrantees receiving funding through the OBO for broadband infrastructure deployment and related activities. This Monitoring Plan includes financial, programmatic, technical, and reporting compliance.

I. Ensuring Compliance

- a. The OBO’s monitoring efforts will be prioritized based on a comprehensive internal risk assessment of each subgrantee and their project(s). The OBO will systematically engage with subgrantees during weekly meetings to provide guidance, identify potential issues, offer technical assistance, and monitor each project’s milestones to ensure they are on track to be completed within four years. In addition to weekly meetings, the OBO will monitor each project through periodic reviews, reporting, site visits, and issue resolution in a timely manner to prevent delays and mitigate risks. Monitoring protocols will be applied consistently across all subgrantees, ensuring fairness and equitable treatment. Subgrantees will be held accountable for meeting all grant terms included in the Grant Agreement, performance metrics (in-puts and out-puts for each grant phase), and compliance requirements. Failure to do so will result in corrective action(s).

II. Progress Tracking and Performance Management

- a. Overall, the OBO’s monitoring activities will be structured across three key phases: (1) pre-award due diligence and readiness monitoring, (2) award compliance and performance monitoring, (3) post-award closeout monitoring. Pre-award due diligence and readiness monitoring will ensure that selected subgrantees possess the capacity and capability to successfully execute their proposed project(s). During this initial phase the OBO shall perform an assessment of project scope, budget, timeline, and technical feasibility based on the subgrantees application and additional project documentation that will be attached to each subaward grant agreement. Prior to entering into any subaward grant agreement and during this initial phase, the OBO shall perform a risk assessment for each subgrantee’s project based on proposal review, capacity assessment, and past performance. After the subaward grant agreement has been executed, the OBO shall begin monitoring each project’s award compliance and performance to ensure projects are progressing as planned, funds are being used appropriately, and compliance requirements are met. The award compliance and

performance monitoring shall include regular performance and financial reporting review and financial auditing (as further explained below), desk reviews, on-site monitoring visits, technical assistance and training, issue tracking and resolution, and if applicable subgrant agreement amendments. The final phase, post-award closeout monitoring, will ensure all project deliverables are met, financial obligations are reconciled, and all closeout requirements are satisfied. Post-award closeout includes the OBO performing, on a project basis, the final performance and financial review, final site visit, audit resolution, and documentation archiving.

- b. The OBO will implement effective progress tracking and performance management for each project to ensure the subgrantee meets their project milestones, adheres to performance targets, and complies with all BEAD program requirements, including federal regulations such as 2 CFR Part 200. Each project will have specific, measurable, achievable, relevant, and time-bound (SMART) targets. These SMART targets will be reviewed and adjusted if necessary. The OBO will monitor subgrantee performance against agreed-upon metrics and targets outlined in their grant agreement. In addition to the reporting required and discussed below, the OBO will also employ a combination of desk reviews and on-site monitoring to track subgrantee progress. Desk reviews include recurring project update meetings between the OBO and the subgrantee, with formal reviews and financial auditing conducted by the OBO immediately following report submissions. Desk reviews include reviewing MPRs, QFRs, and APRs for completeness, accuracy, and consistency. The OBO shall compare reported progress against approved project plans and performance targets. The OBO shall perform on-site monitoring visits, more frequently for medium/high risk subgrantees, or as needed for specific issues. The OBO, along with its technical professional(s), shall perform physical verification of deployed infrastructure and progress reported. The OBO shall also review subgrantee's internal records, including financial ledgers, procurement files, and personnel records, ensuring adherence to 2 CFR Part 200, Subpart D – Post Federal Award Requirements. The OBO, along with its technical professional(s), shall perform an assessment of project adherence to EHP, labor standards, and safety protocols, along with a technical assessment of network performance and functionality. Core performance metrics the OBO will gather and review include each project's homes passed, homes connected, fiber miles deployed, speed tiers achieved (verification of deployed network's ability to deliver minimum symmetrical speeds), affordability plan adherence, project completion rate (percentage of project milestones completed on schedule), and budget utilization rate (percentage of awarded funds expended in line with the project timeline). Once projects have reached substantial completion, the OBO and subrecipient will begin project closeout.

Project closeout requires the subgrantee to submit to the OBO their final financial documents and final performance report signed by a third-party licensed Oklahoma PE. The OBO shall perform a comprehensive review of all final reports, including final expenditure reports, performance outcomes, and asset inventories. The OBO and its professional technical expert shall perform a final site visit for each project to verify project completion, network functionality, and sustainability. The OBO shall perform a final financial and audit review to ensure there is a reconciliation of all funds disbursed and expended, and addressing of any findings from final audits and ensuring all recommendations are implemented. The OBO will also ensure all project documentation (previous reporting, environmental review, etc.) is properly archived and retained according to federal regulations.

III. Risk Mitigation

- a. The OBO will evaluate each subrecipient's technical, financial, and managerial capacity to undertake the project to determine their capability assessment via an internal "Risk Assessment". This risk assessment will be conducted using the subrecipients' responses to the OBO's application questions that focused on the applicants past grant experience, internal accounting principles and financial management systems, and past audit history. Subrecipients' risk level will either be low, medium, or high, and this risk level will inform the intensity and frequency of subsequent monitoring. When non-compliance or performance issues are identified, the OBO will implement a graduated approach to corrective actions, including but not limited to intensified monitoring and potential claw back. The OBO will maintain a centralized database to log all identified issues, findings, and observations from reports and site visits. For any identified non-compliance or significant performance deviation, the OBO will formally notify the subgrantee and require the submission of a corrective action plan, in line with federal regulations regarding noncompliance. The OBO will track the implementation and effectiveness of corrective action plan(s) through follow-up reports, documentation review, and SMART targeted monitoring.

IV. Technical Assistance and Support

- a. The OBO's approach to technical assistance and support is proactive and aims to support subgrantees in overcoming challenges and achieving their goals. The OBO will provide ongoing support to all subgrantees through weekly meetings, on-site visits with technical experts, offering webinars on common challenges (e.g., EHP compliance, procurement, financial management, 2 CFR Part 200 adherence), and connecting subgrantees with OBO technical or financial specialists to address specific issues. The OBO will also continue to provide guidance on BEAD requirements, reporting, and problem-solving, including best practices for compliance with 2 CFR Part 200. The OBO is committed to

continuously improving its progress tracking and performance management processes. Regular internal reviews, analysis of aggregated subgrantee performance data, and feedback from both OBO staff and subgrantees will inform updates to this plan, ensuring its effectiveness and responsiveness to program needs.

V. Reporting and Transparency

- a. Effective progress tracking and performance management are critical components of successful grant administration. The OBO will be tracking and monitoring the following specific grant components: percentage 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 damages, incidents, risks, or delays.
- b. In addition to the NTIA required semi-annual reporting, the OBO will require all subgrantees to provide weekly program status reports (WSR), monthly progress reports (MPR), quarterly financial reports (QFR), and annual performance reports (APR).
 - i. On a weekly cadence, the OBO shall either meet via Teams with each subgrantee and/or be provided a weekly program status report (WSR) that includes updates for each project's current phase (engineering, pre-dig permitting, construction started, etc.), discuss any upcoming financial needs, and ensure each project is on track with their project timeline for substantial completion.
 - ii. Monthly progress reports (MPR) shall be provided to the OBO that include narrative updates on project activities, challenges encountered, solutions implemented, financial reporting on grant funds expended each month, and upcoming milestones. MPRs will also report any deployment progress that the OBO's GIS department shall track. This includes detailed breakdowns of homes passed, homes connected, fiber miles deployed, and other relevant infrastructure metrics for the reporting period.
 - iii. Quarterly financial reports (QFR) shall be provided to the OBO that include detailed expenditure reports aligned with each approved budget, including actual costs incurred, remaining budget, and drawdown requests. All financial reporting must and shall adhere to the requirements set forth in the 2 CFR Part 200, Subpart D- Post Federal Award Requirements and as outlined in the Grant Agreement. QFRs must also include cost documentation, which includes but is not limited to a summary of invoices, contracts, and other supporting financial documentation, maintained in accordance with 2 CFR Part 200. Each QFR will also include a budget variance analysis that requires the subgrantee to provide

an explanation for any significant variances between actual and budgeted expenditures.

- iv. Annual performance reports (APR) shall be provided to the OBO that include a comprehensive review of annual achievements against established performance metrics, including previous reports documenting cumulative progress of total homes passed/connected, total fiber deployed, and overall project status. The OBO shall post to its website an overall summary of the BEAD projects on an annual basis based on information provided in each APR. Please see the grant agreement for additional information.
- c. Semi-Annual Performance Reporting (subject to changes based on updated NTIA guidance). The Subrecipient must submit a Semi-Annual Progress Report for the Project within 15 calendar days following the end of each reporting period. These periods are January 1 - June 30 and July 1 - December 31. The report must include the following information:
 - i. Service Locations & Project Status: List of addresses/locations (including Broadband Serviceable Location Fabric under 47 U.S.C. 642(b)(1)(B)) to be served by broadband infrastructure and their project status. New Project locations served within the reporting period, and for each, whether service was taken (if applicable). Classification (residential, commercial, or community anchor institution) for each location in item 2.
 - ii. Infrastructure & Service Details: Description of constructed and installed facilities. Actual peak and off-peak broadband speeds offered. Maximum advertised broadband speed offered. Non-promotional prices, including fees, for different broadband service tiers.
 - iii. Agreements & Contracts: List of all middle mile interconnection agreements made during the reporting period and their current status. Number and amount of contracts and subcontracts awarded by Subrecipient, disaggregated by MBEs or WBEs.
 - iv. Regulatory Compliance: Any other data required to comply with Commission data and mapping collection standards under 47 CFR § 1.7004 or successor regulations for broadband infrastructure projects.
 - v. Financial & Property Reports (as per Commerce Financial Assistance Standard Terms & Conditions, Nov. 12, 2020, Section A.01): SF-425, Federal Financial Report. SF-429, Real Property Status Report. SF-428, Tangible Personal Property Status Report.
 - vi. Projects over \$5,000,000 (based on expected total cost): Wage Information (choose one): Certification of Davis-Bacon Act (40 U.S.C. 31, Subchapter IV) or corollary State prevailing-wage law compliance for all laborers and mechanics. Project employment and local impact report detailing: number

of contractors/subcontractors, number of workers (direct/third-party), wages/benefits by classification, and whether wages are below Davis-Bacon Act prevailing rates. Project Workforce Information (choose one): Certification that the Project will use a unionized workforce or includes a project labor agreement (29 U.S.C. 158(f) compliant). Project workforce continuity plan detailing: Steps to ensure sufficient skilled/unskilled labor (e.g., professional certifications, training programs, partnerships). Steps to minimize labor disputes and disruptions. Steps to ensure a safe and healthy workplace (e.g., safety training, certifications, workplace safety committees). Names of subcontracted entities and total workers employed by job title. Steps to ensure workers receive sufficient wages and benefits for the local/regional labor market.

- vii. Officer Certifications: Broadband service plans offered do not contain data usage caps. Employees have been informed in writing of rights/remedies under 41 U.S.C. 4712 in their predominant native language, and subcontractors/subrecipients have been required to do the same. All information in the Semi-Annual Progress Report is accurate.

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