



### **OBO CPF Closeout Policy:**

Per the OBO's Grant Agreement, all ARPA Capital Projects Fund ("CPF") projects must reach substantial completion by December 30, 2026.<sup>1</sup> Per the Treasury Final Rule all projects must be officially closed out within 90 calendar days after the conclusion of the period of performance.<sup>2</sup> Each subrecipient is responsible for letting the Oklahoma Broadband Office ("OBO") know once they have reached substantial completion for their ARPA award. According to the Treasury guidance, substantial completion is defined as the date for which the Project can fulfill the primary operations that it was designed to perform, delivering services to end-users.<sup>3</sup> At substantial completion, service operations and management systems infrastructure must be operational. Once the ISP has notified the OBO that their ARPA award has reached substantial completion, the ISP and OBO must close out the project within 45 days.

The ISP is responsible for providing the OBO with their closeout documentation and the OBO will retain 10% of the total grant award for each project until the entire closeout process is successfully completed. The retained ten percent (10%) will not be paid until the U.S. Treasury has approved the projects closeout. Once the subrecipient has prepared the close out documentation, the OBO will submit that documentation to the US Treasury in the following quarterly reporting.

The required closeout documentation is as follows:

#### **1. The Closeout Completion Letter**

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<sup>1</sup> chrome-extension://efaidnbmninnbpcajpcglclefindmkaj/https://oklahoma.gov/content/dam/ok/en/broadband/documents/grant-programs/arpa-slfrf-ii/1.26.24%20Final%20Quarterly%20Grant%20Agreement%20Template.pdf

<sup>2</sup> 2 CFR 200.344(b) <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR682eb6fbfabcd2/section-200.344>

<sup>3</sup> Coronavirus Capital Projects Fund U.S. Department of the Treasury.  
<https://home.treasury.gov/system/files/136/Allocations-Methodology-States-Territories-Freely-Associated-States.pdf>

- A formal **Closeout Completion Letter** must be signed by the ISP's Authorized Officer (AOR) certifying the project's final completion and readiness for closeout review.

## 2. Independent Third Party-Engineer Certification of Project Completion

This report must be prepared and certified by an **<sup>4</sup>Independent Third-Party Engineer in good standing with the Oklahoma State Board of Licensure for Professional Engineers and Land Surveyors** and shall include:

- **"As-Built" Map:** The final "as-built" map (e.g., ArcGIS Webmap) showing the exact, final location and route of the deployed network, confirming completion of the awarded project footprint.
- **Performance Results:** Comprehensive speed and latency test results demonstrating that the live network meets or exceeds the required performance metrics.<sup>5</sup> Speed tests should be performed directly from each of the node implemented in the project. At each node, the subrecipient ISP will be required to test one CPE connected to implemented node. The speed tests should use only common consumer-grade equipment and publicly available speed-testing tools as to emulate closely the reading available to a real-life subscriber. Common speed test applications should be used as the primary test tool. All tests should be run to a single server to ensure consistency of test data. The test server should be outside of the grant funded subrecipient's network to test the upstream connection(s) and emulate real life quality of experience. Following the Treasury's guidance, speed results must be within 80% of the enabled/advertised speeds, latency must be less than or equal to 100 ms, and the minimum acceptable speed is 100 Mbps/20Mbps scalable to 100Mbps/100Mbps (except for those projects with a justifiable impactable exception based on geography, topography, or excessive cost).<sup>6</sup> Failure to provide performance results within the designated percentage below, will result in a withholding of ARPA money.

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<sup>4</sup> The OBO defines "Independent Third-Party Engineers" as engineers that have not been actively participating in the project build out and has an absence of a conflict(s) of interest.

<sup>5</sup> State and Local Fiscal Recovery Funds Project and Expenditure Report User Guide. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://home.treasury.gov/system/files/136/October-2025-PE-Report-User-Guide.pdf

<sup>6</sup>Performance measures testing. Universal Service Administrative Company. <https://www.usac.org/high-cost/annual-requirements/performance-measures-testing/#:~:text=The%20FCC%20performance%20measures%20testing,Testing%20Requirements>

Awarded Technology Type	% Testing Required for Testing
Fiber	At least 25%
Licensed Fixed Wireless	At least 85% with heat map
Hybrid Fiber and Fixed Wireless	At least 50%

- **Service Offerings:** Documentation detailing the final speed tiers and pricing structures being offered to end-users in the completed service area. The OBO will accept performance results such as speed tests to confirm that subscribers can reliably and consistently achieve the broadband speeds and performance metrics promised under the funded service tier. If the subrecipient plans to submit to the OBO active subscribers speed tests to demonstrate service offerings, these shall be redacted by the subrecipient prior to submitting to the OBO to protect PPI. The full amount of ARPA awarded funds are available for projects that serve 85% to 100% of awarded BSLs. For projects serving 60% to 85% of ARPA awarded BSLs, the ARPA total award amount will be prorated on a cost per pass basis (i.e., reduced fixed amount subaward based on the closeout number of locations served). Subrecipient that have received full funding may be required to return funds to the OBO. Failure to provide service to at least 60% of awarded BSLs, will be considered a default of those locations and trigger claw back of ARPA funding.
- **Engineer Certification:** Each subrecipient must provide for each project a third-party independent Oklahoma certified engineer signed-and-sealed certification upon completion of performance results verification (to be performed project-by-project based on industry standards).

### 3. US Treasury Broadband Location Data Template

- Complete the Broadband Location Data Template (from Quarterly Reporting), Labor Reporting (if applicable), and the Project Template (from Quarterly Reporting).

### 4. Final Financial Expenditure Workbook

- The final **Financial Expenditure Workbook** and all corresponding documentation must be submitted (if not previously provided).
- The OBO will **double-check for any previous deficiencies** or unresolved questions in fiscal reporting before proceeding.

### 5. Any Outstanding or Incomplete Reporting previously not submitted.

Once the OBO has received the four required closeout documents as well as any outstanding or incomplete reporting, they will begin their internal review and validation.

The OBO will conduct a technical review to validate physical and operational network compliance. The OBO will also perform a site visit of the grant funded project to ensure the ARPA project is built out and assets purchased are being utilized as specified in the grant agreement. The OBO's GIS department will review compare the "as-built" map to the planned service map that was originally applied with to validate that all agreed-upon routes and locations are enabled and within the approved project area. Any activity (and associated costs) outside the approved project area is not allowed. The OBO will confirm that all third-party engineer test results are time-stamped and signed by a current Oklahoma State Board of Licensure for Professional Engineers and Surveyors engineer. During this review if the OBO was alerted of any deficiencies with the independent third-party engineer test results (i.e., feedback from planned locations that they are not being served, etc.), then the OBO will perform a technical site visit to verify speed test results from a sample of at least 5% of the total enabled locations.

The assigned OBO grant analyst will review all final financial expenditures for compliance with the grant agreement and federal regulations, reconcile final expenditures against the approved budget, determine the final payment amount (the remaining 10%), and provide additional technical assistance to the ISP as needed to resolve fiscal issues. The OBO will confirm that all federal compliance documentation is complete, including: active SAM.gov registration; FFATA documentation; payment records and subaward agreements/modifications; monthly/quarterly reporting; audit/financial documentation; all Grant and/or budget amendments/modifications; the independent third party engineer who performed the closeout report is still in good standing with the Oklahoma State Board of Licensure of Professional Engineers and Surveyors and the final closeout certification letter is complete.

Following the OBO's internal review of all four closeout reports, a formal "Project Closeout Meeting" will be schedule with the ISP, OBO assigned grant analyst, OBO Director of Grants Administration, OBO Chief Strategic Officer, OBO General Counsel, and OBO Executive Director, to review the final project closeout summary. The assigned OBO grant analyst will prepare a summary report (utilizing data from CLAD, the ISP's closeout reports, and internal records) and an agenda, which must be approved by the OBO Director of Grants Administration prior to the meeting. The project closeout meeting agenda items include an overview of the grant and match expenditures in the form of the final Financial Expenditure Workbook, discussion of final project metrics and technical compliance documentation, and a summary of past weekly meetings with the OBO. Following the Project Closeout Meeting, the OBO Executive Director will sign off on the Closeout Report and the OBO will submit all required closeout documentation to the US Treasury (labor reporting, sub data template, and the final certified Broadband Location Data Template).

The OBO shall submit closeout documentation to the Treasury on a quarterly basis during Quarterly Reporting. Only after the US Treasury has approved the project's closeout shall the OBO reimburse the ISP their remaining 10% of grant funding.