

# **FREQUENTLY ASKED QUESTIONS (FAQS)**

## **District of Columbia Office of the Chief Technology Officer (OCTO)**

### **Broadband Equity, Access, and Deployment (BEAD) Program Non-Deployment Projects**

***Updated: 3/28/2025***

#### **1. Are the OSHA, Cyber Security Risk Management, and Supply Chain Risk Management required on the BEAD Non-Deployment Pre-Application?**

No, the DC SBDEO has removed the OSHA, Cyber Security Risk Management, and Supply Chain Risk Management requirements previously requested for the BEAD Non-Deployment Pre-Application. Those who may have responded to those questions will not be impacted in any way.

#### **2. Who is managing the District of Columbia (DC) Broadband Equity Access and Deployment (BEAD) non-deployment subgrantee process?**

DC's State Broadband and Digital Equity Office (SBDEO) is DC's broadband office, housed within the Office of the Chief Technology Officer (OCTO). The SBDEO has managed DC's BEAD program, including creating the Five-Year Action Plan, the Digital Equity Plan, and Initial Proposal Volumes I and II, while also managing DC's BEAD deployment and non-deployment programs and subgrantee selection processes. The SBDEO Team is led by Administrator Kevin Hughes, and OCTO is led by Chief Technology Officer Stephen Miller. Further details on the SBDEO can be found at the Tech Together website:

[www.techtogetherdc.com](http://www.techtogetherdc.com).

#### **3. Who is eligible to apply for a BEAD non-deployment grant in the DC?**

Eligible applicants include non-profit organizations, educational institutions, community-based organizations, and other entities capable of advancing digital equity. Applicants must demonstrate alignment with DC's digital equity goals, including providing affordable internet, digital devices, and digital skills training.

#### **4. What are the priority areas for the BEAD non-deployment grant?**

Non-deployment activities will be evaluated based on their alignment with the following goals:

- 1. Equitable Internet Access:** Projects that make high-quality, affordable, high-speed internet available to all residents, particularly underserved communities.
- 2. Digital Devices and Support:** Initiatives providing low-cost or no-cost devices and IT support to residents most in need.

**3. Digital Literacy and Skills:** Programs that create pathways for digital literacy, focusing on privacy, cybersecurity, accessibility, and inclusivity.

**4. Community Partnerships:** Projects that establish strategic partnerships to promote economic development, workforce goals, and health outcomes.

**5. Which documents should I prepare as an applicant for BEAD non-deployment funding?**

Please review the BEAD Deployment Pre-Application at <https://wdcbroadband.submittable.com/submit>.

**6. How do I register for an account to submit an application?**

Through the SBDEO Pre-Application Portal located at: <https://wdcbroadband.submittable.com/submit>.

**7. It appears that some of the text entry questions have a 500-word limit, which is about a page of text single-spaced. Will the word limits for each individual question allow for a thorough response?**

Yes.

**8. Does the lead applicant have to meet the requirements mentioned or can it be a collaborative of organizations?**

All applicants have to satisfy all eligibility requirements.

**9. Are both for-profits and nonprofits eligible?**

Neither for-profit nor non-profit status is considered disqualifying by SBDEO.

**10. What is the phase 2 timeline for non-deployment, and when will the phase 2 grants be announced?**

Phase 2 for non-deployment will open on March 28<sup>th</sup>, 2025. Notice of provisional selections will occur in accordance with NTIA guidance.

**11. Can you explain a bit more about Phase 2 for non-deployment?**

Prospective subgrantees that meet all qualification requirements will be invited to participate in the subgrantee selection process. Prospective subgrantees that fail to meet all qualification requirements will be unable to proceed. Prospective subgrantees will be evaluated based on the following: alignment with digital equity goals, project feasibility, prior experience and impact, community engagement, sustainability, and innovation.

**12. The timeline slide showed that the non-deployment NOFA would be issued imminently and the non-deployment RFA could start in March, around the same time as the deployment RFA. Is that correct?**

Yes, both the deployment and non-deployment process will have overlapping competition periods.

**13. Must the applicant and all partners be headquartered or registered in DC and certified as a Certified Business Enterprise (CBE) to be eligible? If so, does this only apply to the prime applicant or also collaborators?**

No, the applicant and partners do not need to be headquartered within the District, but they do need to be licensed to do business within the District. Certification as a CBE is not a precondition of participation in the BEAD subgrant program.

**14. Outside of BEAD, are there other grant programs that we can discuss with OCTO?**

The focus of these FAQs is for BEAD non-deployment only. Monitor [techtogogetherdc.com](http://techtogogetherdc.com) and the DC Register for opportunities to work with OCTO.

**15. Could DC SBDEO advise on the best way to pursue a partnership with DC-Net or other local government entities for BEAD non-deployment funds? In reading the BEAD rules, it appears that partnerships with local agencies are allowed, and the local process gives extra points for securing government agency support letters.**

Partnerships with DC-Net are not an option at this time. We encourage direct contact with other local government entities as the applicant deems appropriate.

**16. Are national organizations eligible to apply for DC's BEAD non-deployment grant?**

National organizations are eligible to apply for DC's BEAD non-deployment grant.

**17. NTIA has issued a Letter of Credit Waiver in favor of a Performance Bond. Is SBDEO following this guidance in the final non-deployment application?**

Yes, for the BEAD non-deployment grant, applicants can utilize a Letter of Credit Waiver and instead provide a Performance Bond, as the National Telecommunications and Information Administration (NTIA) has issued a programmatic waiver allowing for this option.

**18. Currently applicants are required to secure a Letter of Credit or performance bond. Would the SBDEO consider adding an option allowing prime contractors to require subcontractors to obtain performance bonds?**

The prime contractor, as the lead applicant, is required to secure a letter of credit or performance bond.

**19. Is the cost of the required performance bond a reimbursable expense?**

No, that cost is not reimbursable.

**20. Can activities in the BEAD Non-Deployment program include infrastructure installation, as long as they are not covered by the BEAD Deployment phase? For example, upgrading the wiring and networking equipment inside a multi-dwelling unit is listed as an allowable use by NTIA for Non-Deployment.**

Non-deployment uses are limited to those described in Section 7, Subsection A(iii) of the BEAD NOFO.

**21. The BEAD NOFO references apartment Wi-Fi outside of Section 7, Subsection A iii. When you evaluate the pre-applications, will the SBDEO provide feedback on the proposals for allowable use of these funds?**

Internet or Wi-Fi infrastructure that provides qualifying broadband services within an eligible multi-family residential building is an eligible use of funding under BEAD deployment activities only.

**22. Is it acceptable use for a non-profit to partner with other community-based organizations to use funding for digital literacy, workforce development, and community engagement?**

Consortiums where eligible entities partner together, and having one lead applicant, are allowable. However, all entities involved must adhere to all rules and requirements of the BEAD NOFO and the BEAD non-deployment application.

**23. How should an organization respond to questions related to broadband access and broadband supplies on the application if that does not pertain to our organization or approach to this grant?**

Broadband access and supplies are not a part of the BEAD non-deployment application.

**24. Do all of the projected subcontractors need to be identified when the pre-application is submitted?**

The applicant, to the best of their ability, must outline the organizations/entities with which the entity plans to contract and subcontract while executing BEAD projects in the pre-application.

**25. The non-deployment webinar mentioned having the prospective applicant complete the Broadband Data Collection filing with the FCC. Can you please advise if this is accurate and share a link to said filing website?**

This is not required for the BEAD non-deployment pre-application.

**26. What is the project period for the grant?**

The period of performance for BEAD funds is 5 years from the date of the award. Subawards will be broken into one-year increments. Amendment of an award to extend the period of performance for subawards is at the discretion of the SBDEO.

**27. Is there a minimum and maximum number of DC residents across all covered populations to be served in an applicant's proposal?**

There is no established minimum and/or maximum number of residents to be served.

**28. Does a non-profit 501c3 training provider applying for the grant have to provide responses for the following: professional competence for OSHA, cybersecurity**

**risk management plan, supply chain risk management plan, risk management sand mitigation plan, letter of credit and a performance bond, and financial projections for five years?**

Yes, all referenced documentation is required.

**29. What is the global timeline for the entire nondeployment process?**

The timeline of the BEAD grant is for five years from the date of the award.

**30. When will Phase 1 decisions be made and announced?**

Only applicants who have successfully passed Phase 1, which ends on March 23, 2025, will be able to move forward to Phase 2. Successful applicants will be notified thereafter via email.

**31. When will the Phase 2 application window open and what is the submission deadline?**

Submission application window will begin March 28<sup>th</sup> and end April 13<sup>th</sup>.

**32. What is the period of implementation?**

The BEAD implementation period is 5 years from the date of the award.

**33. What will activities start and when are they expected to be completed by?**

Activities will start after the SBDEO receives final approval from NTIA on all sub-grantees from the final report submission on May 9<sup>th</sup>.

**34. The application requires applicants to provide job titles, workforce size (FTE positions, including contractors and subcontractors) and the organizations that will employ each portion of the workforce. However, project design and partners will not be finalized until Phase 2, making these specifics unavailable at this stage. Would the SBDEO accept a general workforce strategy in Phase 1, with specific roles and employer details provided in Phase 2?**

Perspective Entities must submit all requested and required information within the pre-application to verify eligibility to move forward to Phase 2.

**35. What is the device ownership policy or regulation for federally-funded devices?**

Items of equipment with a current per unit fair market value of less than \$5,000 may be kept, sold, or otherwise disposed of by the prevailing applicant with no further responsibility to the federal government.

**36. Is a company that is an FCC-registered Affordable Connectivity Program (ACP) Provider eligible to apply for the BEAD non-deployment grant and offer tablets and data plans to eligible, low-income households?**

The ACP Program has officially ended. Any BEAD-eligible entity can apply for a BEAD non-deployment subgrant.

## Matching Requirements and Funding Disbursement

### **1. Is there a minimum matching requirement for BEAD non-deployment applicants?**

There is no match requirement for non-deployment.

### **2. If I win an award, what can I spend the money on?**

For a complete list of allowable costs please visit NTIA's [website at Home Page | National Telecommunications and Information Administration](#).

### **3. If I win an award, how will I receive funding?**

OCTO's policy is to reimburse supported, approved, and allowable expenses. If the Applicant seeks an advance payment, it must request advance payment in its application and explain why an advance payment is requested.

### **4. If I win an award, how long will I have to use the funding?**

Subgrantees that receive BEAD non-deployment funds must conduct the planned activities and begin providing services coinciding with the projected achievement milestones indicated in the narrative and other information they have provided with their application.

### **5. Are all applicants, and each partner within a consortium, required to submit audited financial statement before BEAD non-deployment award is made?**

Consortium applications shall upload audited financial statements certified by an independent certified public accountant for the last two years for each participant in the consortium.

If the entity has not undergone an audit in the ordinary course of business, they must submit unaudited financial statements from the previous two fiscal years and certify that audited statements from the prior fiscal year, prepared by an independent certified public accountant, will be provided upon award.

If audited statements are unavailable, please include an explanation as a cover memo outlining the lack of audit, along with current year interim financial statements (e.g., Profit & Loss, Balance Sheet, Cash Flow Statement). Audited financial statements from the prior fiscal year will be required before the award is granted.

### **6. The term "consortia" is referenced as the official grouping of entities on a single application. Does this include organizations providing Letters of Intent (LOIs), or is there a distinction between consortia members and LOI contributors?**

For the purposes of applying, a Lead applicant needs to be clearly identified, along with all other members of the consortia, and any contributors.

- 7. Can the consortium members meet the BEAD requirements individually, or can different members fulfill different requirements (e.g., bonding, match funding, financial capacity) on behalf of the consortium?**

The prime applicant must be able to fulfill all of the BEAD requirements.. All requirements pertaining to bonding and financial capacity must be sourced from the prime applicant.

- 8. Do all consortium members need to upload documents for each topic area in each section of the application?**

Yes.

- 9. If LOI contributors are not considered full consortium members, what level of compliance is required? Must they fully meet all BEAD regulations, or can compliance be achieved collectively through the prime applicant and other partners?**

For consortium applicants all requirements must be fully met by the prime or lead applicant.

- 10. Can a member of the consortia be added after March 23, 2025?**

All members of consortia must be reported at the time of application submission.

- 11. Is there a minimum or maximum amount for the grant?**

There is no established minimum or maximum amount for the non-deployment grant, subject to funding availability.

- 12. Nonprofits and non-deployment entities often rely on grants rather than revenue-driven business models. Would the SBDEO accept alternative documentation, such as funding sustainability plans or historical grant management records?**

Alternative documentation will not be accepted in lieu of required documentation.

- 13. For nonprofits that primarily operate with grant funding and subcontractor agreements, would OCTO accept invoices from subcontractors, consultant payments, or purchase orders instead of traditional vendor payments?**

See response to Question 12, above.

- 14. For non-deployment prime contractors that subcontract work, can a subcontractor fulfill the bonding requirement, or must the prime applicant secure bonding directly?**

The prime applicant must secure bonding directly.

- 15. Our organization cannot be issued a performance bond since our non-deployment work is not construction related. Does this prevent our organization from using a conditional waiver for the non-deployment grant?**

At the time of application, prospective applicants must indicate whether the entity plans to secure an irrevocable standby (LOC) or obtain a performance bond under the conditional programmatic waiver of the (LOC) requirements. If providing a letter of credit, prospective applicants must upload a financial capacity letter from a bank stating the ability to obtain an irrevocable standby Letter of Credit (LOC), in the required form, from an eligible bank or credit union, including the projected maximum amount to be covered by a LOC. If obtaining a performance bond, prospective applicants must upload a letter from a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the Department of Treasury Circular 570 committing to issue a performance bond to the applicant. The letter shall at a minimum provide the dollar amount of the performance bond. If the prospective applicant Entity is prohibited or otherwise unreasonably restricted from entering an LOC or securing a performance bond, they must explain why the entity is prohibited or otherwise unreasonably restricted from entering an LOC or securing a performance bond.

### **Further Information**

#### **1. Where can I find more information about the BEAD Program and DC's non-deployment subgrantee process?**

- [BEAD Non-Deployment Pre-Application Portal](#)
- [BEAD NOFO](#)
- [DC BEAD IPV Volume I](#)
- [DC BEAD IPV Volume II](#)
- [SBDEO BEAD Non-Deployment Webinar – February 20, 2025](#)
- Join the SBDEO's mailing list to receive regular updates by emailing us at [techtgether@dc.gov](mailto:techtgether@dc.gov)

#### **37. Who can I contact with any additional questions?**

For questions pertaining to the BEAD Pre-Application Portal please email us at [octo.grants@dc.gov](mailto:octo.grants@dc.gov). For any other questions please email us at [techtgether@dc.gov](mailto:techtgether@dc.gov).

### **Important Dates**

- **NOFA Publication Date:** February 7, 2025
- **BEAD “Non-Deployment” Pre-Application Window Opens:** February 21, 2025
- **Draft Request for Applications (RFA) for Public Comment Posted for 14 days:** February 21, 2025
- **BEAD “Non-Deployment” Pre-Application Window Closes:** March 23, 2025
- **RFA Opens:** March 28, 2025
- **Application Due:** April 13, 2025