EXHIBIT F

ARCONNECT

BEAD PROGRAM MONITORING PLAN

Contents

Version	Date	Description
Version 1	May 15, 2025	Original Detailed
Version 2	August 7,2025	Post BRPN

1. Introduction

1.1   Purpose

Section 4.2.1 of the BEAD Final Proposal outlines the measures that the Eligible Entity (in this case, the Arkansas State Broadband Office) will take to: (a) ensure that each Subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to June 30, 2032, in accordance with 2 C.F.R. 200.344;[1] and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by June 30, 2032, in accordance with 2 C.F.R. 200.344.

In administering a federal grant funding program, the Arkansas State Broadband Office (ARConnect) is responsible for the oversight of the Broadband Equity, Access, and Deployment (BEAD) Program and compliance with all programmatic and other applicable federal requirements. This document serves as a record of past activities undertaken and a plan for ongoing evaluation.

1.2   Approach

The overall monitoring approach and process is comprised of initial and ongoing risk assessment informed by direct observation, Subgrantee self-reported findings, desktop review, and field audit visits. By taking a continuous approach to project monitoring, ARConnect is allowing for immediate remedial action to ensure projects remain on track for timely completion.

1.3   Outcomes

The goal of the ARConnect Bead Program Monitoring Plan (BPMP) is to achieve 100 percent completion of all BEAD-funded broadband infrastructure deployment projects by the dates outlined in the federal program. Successful outcomes include: all infrastructure deployed (technical project closeout), all closing and compliance documents received, all funding disbursed, and all mandated reporting requirements completed.

1.4   Roles and Responsibilities

A successful monitoring and compliance program involves all parties being committed to transparency, accuracy, and timeliness. While ARConnect holds ultimate responsibility for implementing the BEAD Program, all participants must be held accountable for their roles and tasks.

2. Evaluation

To ensure that the Subgrantees can undertake and successfully complete their broadband deployment projects in a timely and successful manner, ARConnect employed a two-phase

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[1] https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR682eb6fbfabcde2/section-200.344

process of pre-deployment review and will also apply continuous monitoring during both pre-construction and construction activities.

2. 1   Phase 1: BEAD Pre-Registration Phase – Provider Level

ARConnect collected and evaluated information on all BEAD applicants who were seeking to become eligible to participate in the BEAD Program. This information was required by either the Notice of Funding Opportunity (NOFO)[2] or Arkansas Initial Proposal Volume II. The full list of questions asked, and information collected was made available to Subgrantees via a public facing website and through a User Guide. After ARConnect reviewed the qualifications, applicants were given a designation of "meets the minimum requirements," "does not meet the minimum requirements or "meets the minimum requirements with noted conditions." If the applicant fell into the latter category, they were required to clear the noted conditions in order to be eligible as a preliminary selectee.

The Compliance Team provided technical assistance to all preliminary selectees via email and virtual sessions with the goal of passing their submissions.

2.2   Phase 2: Post Selection Risk Assessment – Project Level

Upon final selection of all BEAD deployment awards, each award/project will undergo a Project Level Risk Assessment process. The Project-Level Risk Assessment will assign a risk category of "low/medium/high" for project monitoring. The Standard Monitoring Plan (SMP) will apply to projects classified as low risk, and additional monitoring will be required for projects classified as medium or high risk.

3. Continuous Monitoring and Assessment

3.1   Standard Monitoring Plan (SMP)

Projects that are classified as low according to the Project Level Risk Assessment fall under the SMP. The SMP will be performed by ARConnect or its vendors, consultants, or representatives.

Key elements of the SMP include:

1. Kick-off meeting
2. Desktop review
3. Field audits
4. Reporting
5. Documentation

3.1.1. Kick-off Meeting

ARConnect's compliance team, project managers, and technical specialists will meet with members of the Subgrantee organization either in-person or virtually after the formal award but

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[2] https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

prior to construction start. The kick-off meeting will serve to set expectations for monitoring and compliance, and to review project design and documentation. After the initial kick-off meeting, a regular cadence of meetings will be scheduled, depending on the project size, complexity, and risk.

3.1.2   Desktop Review

At Milestone 1, ARConnect approves the initial project plans and budget and authorizes a disbursement (Appendix B) upon satisfaction of the criteria. However, it is a vital part of a monitoring program that any updates to the network plans, diagrams, schedules, and budgets are reviewed quarterly and cross-examined against the progress reported in the portal. If there are significant changes to the project footprint (area), some permits may need to be revisited.

3.1.3   Field Audits

Field audits under the SMP will be conducted at predetermined milestones and scheduled in advance with the subrecipient.

Field visits will be preceded by a desktop review of the following items:

1. Review of the Subgrant Agreement
2. Review of construction drawings and/or network design
3. Review of reported deployment data obtained from the online portal

In addition, a walk out map will be created in ArcGIS Field Maps[3] tool. The results of this review will be recorded on the Field Checklist and integrated into the electronic Portal.

3.1.4   Reporting Requirements

ARConnect will require Subgrantees to report location data milestones via an electronic portal[4] (Portal) on a quarterly basis at a minimum. In the Portal, each Broadband Serviceable Location (BSL) is attached to the Subgrantee by project groupings. Upon reaching a milestone, the Subgrantee will mark each BSL with the appropriate status. Examples of milestone statuses are "permits ordered," "construction started," etc. These milestone data points will be collected and analyzed in the portal for real-time project assessment.

3.1.5 Permitting and Regulatory Documentation

In addition to providing milestone data, Subgrantees are responsible for reporting on the status of all zoning, permitting, and other regulatory actions, such as:

1. Pole attachment agreement efforts
2. Right-of-way permits
3. Environmental permits (EHP/NEPA/Section 106)
4. Building or construction permits
5. Dig Once/811 coordination
6. Federal and state permits

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[3] https://www.arcgis.com/apps/fieldmaps/
[4] The electronic portal is the Ready.Net Automatic Reporting and Compliance (ARC) system

7. Local zoning use permits

Each Subgrantee is responsible for identifying and applying for all applicable permits for each project area. Milestone 2 of the Disbursement Schedule (Appendix B) requires proof of permit applications before funds are disbursed.

3.2   Enhanced Monitoring Plan (EMP)

Projects that fall under a Medium or High-Risk designation will be subject to an Enhanced Monitoring Plan (EMP). This plan follows the same guidelines as the Standard Monitoring Plan, but it also includes some additional checks. These additional checks might include:

1. Increase in the number and frequency of on-site field visits
2. Random spot-checks that are not scheduled in advance
3. Increase in reporting cadence
4. Enhanced technical assistance from Compliance Team

3.3   Quarterly Evaluation

Over the course of the deployment period, ARConnect will reevaluate projects on a quarterly basis and adjust the risk category if necessary. Projects can move both up and down in risk category. The information gathered during the phases and types of monitoring will be analyzed. ARConnect will also use a formal risk assessment matrix. This formal evaluation process demonstrates ARConnect's accountability to all stakeholders by providing updates on project performance and impact.

4.0 Mitigation Process and Procedures

4.1   Issue Identification

If, during the monitoring period, a Subgrantee or a project is found to be lacking or failing in one or more critical areas, they will be given constructive feedback and possibly subject to a tiered corrective action plan. These critical areas include, but are not limited to:

1. Reporting timeliness and accuracy
2. Schedule adherence
3. Budget adherence
4. Zoning, permitting, and regulatory filings
5. BABA compliance
6. Workforce and Labor standards

4.2   Corrective Action Plans (CAP)

The tiered corrective action plan will include levels of recommendations and actions that the Subgrantee will need to fulfill to be moved off the CAP. The Compliance Team will inform ARConnect of each Subgrantee/Project that is the subject of a CAP. All CAPs will be thoroughly documented. The levels are as follows:

Level 1 – First time and/or minor issues in two or less critical areas

Level 2 – Second time and/or major issues in two or more critical areas

Level 3 – Repeated issues in two or more critical areas

Each CAP will have a series of mitigation measures that might be technical or non-technical in nature. Each measure or step will have to be successfully completed before being released from the CAP. Levels 1 and 2 can be released by the Compliance Team, but Level 3 plans will need to be signed off on by ARConnect director.

4.3   Serious Infractions

Any breach of contract or failure to meet the terms of the Subgrantee Agreement will be immediately escalated to the ARConnect.

5.0 Closeout Procedures

5.1   Technical Closeout

The technical closeout is only complete if all previously identified risks have been mitigated and closed. The technical closeout letter may be used to serve fulfillment notice to any financial institution that has provided a bond or a letter of credit to the subgrantee.

ARConnect will collect proof of physical deployment and be prepared to submit if audited. Examples of documentation might include:

1. Photos
2. KMZ files
3. As-builts
4. Closed out permits
5. Final bill of materials
6. Checklists and logs from field visits
7. Attestation from ISP as to fiber route miles
8. Attestation of construction start date and end date
9. Date of final field visit

Upon completion of deployment and after the Subgrantee's architect/engineer has conducted its own final inspection and any deficiencies have been corrected, Subgrantee shall certify in writing to the ARConnect that the deployment is complete and placed into service in accordance with the terms of the Application.

After receiving the Subgrantee's certification, ARConnect will schedule a final inspection of the Broadband Project. Representatives of ARConnect, Subgrantee's architect/engineer, and Subgrantee and/or contractor(s) shall attend the final inspection. The Subgrantee acknowledges and agrees that ARConnect will provide NTIA with reasonable advance notice of the final inspection so that a representative of NTIA may participate.

ARConnect or its designee may perform any inspections and testing and collect any data that ARConnect or its designee deems sufficient to confirm the completion of deployment in compliance with the project specifications, the Subgrant Agreement, and all applicable regulations. The Subgrantee shall promptly remedy any defect identified in the final inspection. After the ARConnect or its designee determines, in their sole discretion, that the deployment of the Broadband Project is complete, then ARConnect shall provide the Subgrantee with written confirmation of completion (Completion Certification).

5.2 Performance Data

Performance Data: It is anticipated that NTIA will provide a template for the collection of BSL level data. Each Subgrantee must fill out a location data sheet that contains location data by BSL. ARConnect will review the data with the Subgrantee and collect backup documentation for proof of speed and latency. Some of the fields collected might be:

1. BSL Location ID
2. Provider ID
3. Lats/Longs out to six decimal points
4. Technology Type
5. Locations Passed
6. Download Speed
7. Upload Speed
8. Latency

5.3 Financial Closeout

Financial closeout happens only after ARConnect has issued the technical notice of completion. ARConnect reserves the right to examine any receipts and invoices for costs incurred during the project. Backup documents are kept in case of an audit. The elements of the financial closeout letter should address:

a. Initial grant amount
b. Total verified expenditures
c. Amount over/under budget
d. Spreadsheet of expenditures
e. Documentation as provided by the Subgrantee for each disbursement milestone (according to Appendix C: Disbursement Documentation Requirements)

As with the technical closeout section, the financial closeout is only complete if all previously identified risks have been mitigated and closed. The financial closeout letter may be used to serve as a fulfillment notice to any financial institution that has provided a bond or a letter of credit to the Subgrantee.

5.4 Federal Guidelines

The CFR 200, Section 344[5] contains the rules and guidance around closeout. It is important to note that there are time stipulations. "A recipient must submit all reports (financial, performance, and other reports required by the federal award) no later than 120 calendar days after the conclusion of the period of performance. A subrecipient must submit all reports (financial, performance, and other reports required by a subaward) to the pass-through entity no later than 90 calendar days after the conclusion of the period of performance of the subaward (or an earlier date as agreed upon by the pass-through entity and subrecipient). When justified, the federal agency or pass-through entity may approve extensions for the recipient or subrecipient."

5.5   ARConnect Guidelines

Each state, territory, or broadband office that is considered a pass-through entity or grantee may have its own program guidelines that it must follow. These guidelines should complement rather than circumvent or supersede any federal guidelines. If any of these additional rules pertain to project closeout, they should be followed. These might be:

1. Special reports to legislative bodies
2. Document control rules
3. Shared services closeout procedures
4. Public notice requirements

5.6   Documentation and Record Keeping

Upon project closeout, all documents should be stored in an electronic archive such as a cloud-based service. Some state broadband offices may require local hard drive storage by their IT department. The following should be archived:

1. Documents
2. Photos
3. Important email correspondence
4. Location Data Templates
5. Invoices and Receipts
6. Monthly Reports
7. Post award reports

All documents are subject to a general audit and should be organized in an easily accessible manner.

6.0 SAC Conditions

ARConnect will comply with the recipient-specific SAC requirements inclusive of subgrantees.

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[5] https://www.ecfr.gov/current/title-2/section-200.344

Appendix A – Governing Materials

The Arkansas BEAD Program Monitoring Plan is governed by the following:

BEAD NOFO[6] – The National Telecommunications and Information Administration (NTIA), U.S. Department of Commerce issued a Notice of Funding Opportunity (NOFO) to describe the requirements for all grant award under the BEAD Program, authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60102, Public Law 117-58, 135 Stat. 429 (November 15, 2021) (Infrastructure Act or Act) also known as the Bipartisan Infrastructure Law.

BEAD_IPFR_GTC_04_2024[7] – The General Terms and Conditions for the NTIA BEAD Program require ARConnect to ensure each Subgrantee or contractor, including lower tier Subgrantees or subcontractors, complies with all applicable federal, state, and local laws and regulations, and all applicable terms and conditions of this award. ARConnect is responsible for ensuring that all contracts, including those necessary for the design and construction of facilities, are implemented in compliance with the Terms and Conditions of this Award.

BEAD Policy and Waiver Notices[8] – The official website of the NTIA BEAD Program. This website contains various policy notices and notices of waivers issued by NTIA in connection with the BEAD Program.

2 CFR Part 200, Subpart D[9] – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards – The government-wide regulations issued by the U.S. Office of Management and Budget (OMB) that contain OMB Guidance for Federal Financial Assistance. Included in 2 CFR Part 200 is Subpart D – Subrecipient Monitoring and Management, which provides the overall framework for subrecipient monitoring.

ARConnect Initial Proposal Volume 2 – Volume 2 covers actions specific to the AR BEAD Program.

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[6] https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

[7] https://broadbandusa.ntia.doc.gov/sites/default/files/2024-05/BEAD_IPFR_GTC_04_2024.pdf

[8] https://broadbandusa.ntia.gov/funding-programs/broadband-equity-access-and-deployment-bead-program

[9] https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D

Appendix B – Milestone Disbursement Schedule

Milestone	Disbursement (percent of award)	Maximum Cumulative Disbursement (percent of award)
ARCONNECT approval of detailed project budget and schedule	10%	10%
Proof of binding agreement to acquire Build America, Buy America Act (BABA)-compliant equipment and proof that permits have been requested	10%	20%
Provider certification and ARCONNECT completion of technical and compliance audit that the provider has reached:		
10% of project BSLs	15%	35%
40% of project BSLs	25%	60%
70% of project BSLs	25%	85%
100% of project BSLs and ARConnect approval of completion and closeout	15%	100%

A subgrantee may certify that it has "reached" a location when it is capable of performing a standard installation of qualifying broadband service, at a standard installation charge, within ten (10) business days after the date on which a service request is submitted.

Appendix C – Disbursement Documentation Requirements

Subgrantees will be required to submit in conjunction with any request for disbursement:

1. Certification that qualifying broadband is available at the relevant percentage of locations; and

2. One of the following:

   A. A report showing project expenses using Generally Accepted Accounting Principles or other standard accounting practices; or

   B. A report showing the relative proportion of costs across the following key spending areas:

      - Professional services;
      - Construction services;
      - Outside plant, towers, and poles;
      - Network and access equipment;
      - Customer premise equipment
      - Contingency funds; and
      - All other expenses; or

   C. A report demonstrating that the project's projected cost per location is consistent with the project budget; and

3. Documentation of Matching Funds in an amount proportional to the applicable milestone.

Subgrantee shall comply with any other disbursement documentation requirements implemented by ARConnect during the term of this Agreement. Subgrantee must maintain sufficient records to substantiate all information submitted in all requests for disbursement.