



Milestone Disbursements

Arkansas BEAD Technical Assistance

April 13, 2026

BEAD Milestone Payments: Session Overview



This session provides an overview of how BEAD milestone payments work and what subgrantees should expect. We will cover:

- The three types of BEAD disbursements
- Required documentation for each payment
- The review and approval process

BEAD payments are tied to verified progress—not traditional reimbursement

Our goal is to help you plan ahead, submit strong documentation, and avoid payment delays

BEAD Milestone Payments

BEAD uses milestone-based payments to ensure funds are released based on measurable progress.

Milestone-Based Release

Payments are issued after specific milestones are completed and verified

Replaces Reimbursement

This approach replaces traditional invoice-based reimbursement

State Confirmation Required

The state must confirm completion before releasing funds

To remain compliant with NTIA requirements and the Letter of Credit Waiver:

- Disbursements must occur at least every six months
- Interim payments may be issued based on proportional progress toward the next milestone

Milestone	Description	Unlocked %	Cumulative %
M1	Budget, schedule & network design approved	10%	10%
M2	BABA compliance + permits accepted	10%	20%
M3	10% of BSLs passed	15%	35%
M4	40% of BSLs passed	25%	60%
M5	70% of BSLs passed	25%	85%
M6	100% of BSLs passed + closeout	15%	100%



This structure ensures accountability while maintaining steady project funding.

Three Kinds of Disbursement Milestones



The fixed amount subaward is divided into several project milestones, each tied to a percentage of the total subaward.

Three kinds of BEAD disbursement milestones:

Pre-Deployment Milestones

Cover the work that must be completed before construction can begin

Deployment Milestones

Track construction progress as service is built out to BEAD-eligible locations

Interim Progress Milestones

Provide six-month payments based on measurable progress toward the next milestone

These allow projects to receive funding as work progresses while holding subgrantees accountable to the obligations of the BEAD program.

- Not every project will utilize interim progress milestones
- Each type still follows the same basic review steps

How the Milestone Review Process Works



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Monthly submission

Each month, subgrantees submit documentation through the portal



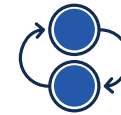
Evidence review

Documentation is used as evidence for disbursement milestones.



Completeness check

Reviewers confirm the evidence is complete and matches milestone requirements.



Clarification if needed

Additional information requests or resubmissions to validate milestone requirements.



Payment approval

ARConnect approves payment and begins the disbursement process

The milestone process will look slightly different for each type of milestone

Pre-Deployment Milestones: Submitting Project Documentation

- Pre-Deployment milestones happen before construction starts. They prove the project is truly ready to build. For Arkansas BEAD, these are milestones 1 and 2.
- For these milestones, subgrantees will upload required documents or directly input data into the portal, responding to clarifying questions or revision requests as needed.
- Clear, organized submissions help avoid delays and speed up payment approval.

Key Tip: Avoid Delays

Most delays come from missing or unclear documents.

Preparing a complete package upfront saves time.

What to Do

- Input all required data within the portal
- Respond promptly to clarifying questions or revision requests
- Organize submissions clearly to speed up payment approval

Milestone 1 Requirements	Milestone 2 Requirements
Detailed project budget	BABA manufacturer certification letters
Project implementation plan	Waived electronics tracker
NEPA milestone schedule	Permit acceptance confirmations
Network design (map + shapefile)	

Deployment Milestones: Verifying Build Progress

Deployment milestones confirm that the network is being built and that locations can receive service

Reports must include evidence of service availability (e.g., maps, geo-tagged photos, or connectivity tests)



Location Map Data

Spatial data confirming coverage of BEAD-eligible locations



Geo-Tagged Photos

Photographic evidence tied to specific field locations



Connectivity Testing

Network connectivity test results demonstrating service availability

To verify a deployment progress milestone, ARConnect may conduct an onsite visit in addition to evidence submitted in the portal.



Location-based reporting will be covered in more detail at a future TA session.

Why Field Visits Are Used



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1

Confirm Evidence Matches Reality These checks confirm that the evidence submitted matches what exists in the field.

2

Reduce Reporting Errors They reduce the risk of errors in project reporting and help keep projects audit-ready.

3

Field visits are not treated as inspections or punishments, they are a normal verification tool in large federal programs

Interim Progress Milestones: Supporting Long Projects



In large, long-term projects, progress toward milestones can take a while, and building up a project to complete milestones is costly

- Interim Progress milestones allow partial payments as work progresses under a fixed-amount subaward
- Payments are tied to documented progress in the portal and reviewed like other milestones

Not Advance Payments

Interim disbursements are not advance payments; they are prorated based on work done.

Evidence-Based Verification

ARConnect verifies progress using submitted evidence to determine interim disbursement amounts.

What Reviewers Look For in All Milestones

In general, reviewers will check whether the evidence is **complete, clearly tied to the milestone requirements, and easy for someone else to understand later**. This ensures payments are defensible during audits and program reviews.

➤ Clarity and Traceability

Reviews focus on clarity and traceability—evidence doesn't need to look fancy to contain all the right information

➤ Long-Term Defensibility

Clear evidence helps years after construction is done

Common Reasons Payments Are Delayed

Payment delays most often occur when:

- Required documents are missing
- Files are unclear or incorrectly labeled
- Responses to follow-up questions are delayed



Most delays can be avoided with strong preparation and timely communication.

To help prevent delays:



Consistent Monthly Reporting

Maintain consistent, high-quality monthly reporting in the portal



Plan Evidence Collection

Plan evidence collection in advance



Clear Points of Contact

Assign clear points of contact for reporting and compliance

Key Takeaways

Milestone reviews protect the BEAD program and your project. Clear, complete evidence leads to faster approvals and fewer issues later. The review process helps ensure projects are funded, compliant, and successful



Shared Goal

ARConnect and subgrantees share the same goal: [successful deployment](#).



Strong Documentation

Strong documentation benefits everyone.

BEAD Milestone Disbursement Summary



Milestone	Description	% Unlocked (This Milestone)	Cumulative %	What This Funds
M1	ASBO approval of detailed project budget, schedule (incl. NEPA), and network design	10%	10%	Planning, design, and pre-construction readiness costs
M2	BABA compliance + permits applications complete/accepted	10%	20%	Procurement and permitting costs
M3	10% of BSLs passed	15%	35%	Early construction mobilization and materials
M4	40% of BSLs passed	25%	60%	Mid-build construction, make-ready, fiber deployment
M5	70% of BSLs passed	25%	85%	Continued construction and customer activation
M6	100% of BSLs passed + closeout	15%	100%	Final construction, closeout, and as-built documentation



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