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Applying Organization	EXECUTIVE OFFICE OF THE STATE OF SOUTH CAROLINA
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4.2 BEAD Program Monitoring Plan

South Carolina Office of Broadband

Executive Summary

The South Carolina Broadband Office (SCBBO) Broadband Equity Access and Deployment (BEAD) Program Monitoring Plan outlines the oversight and accountability framework through which the SCBBO will monitor BEAD deployment subgrantees throughout the lifecycle of their BEAD awards. The objective of this monitoring plan is to support the successful implementation of the BEAD Program in South Carolina in a manner that balances transparency, accountability, and oversight sufficient to minimize the opportunity for waste, fraud, and abuse and allow the public to understand and monitor subgrants awarded under the BEAD Program.

Subgrantees are required to adhere to all applicable provisions of the Infrastructure Investment and Jobs Act (IIJA), the Notice of Funding Opportunity (NOFO) as amended by the BEAD Restructuring Policy Notice, and the specific terms of South Carolina's BEAD award, including any Special Award Conditions (SACs). Additionally, compliance with the BEAD Program General Terms and Conditions, any subsequent award amendments, and all relevant federal, state, and local laws and regulations is mandatory for the SCBBO and its subgrantees. This plan adheres to the minimum statutory and regulatory requirements within the applicable guidance listed below:

- [47 USC 1702: Grants for broadband deployment](#)
- [2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
- [BEAD NOFO.pdf](#)
- [NTIA BEAD Restructuring Policy Notice](#)
- [General Terms and Conditions for NTIA BEAD Program Funds - April 2024](#)
- [DOC Standard Terms and Conditions - 12 November 2020 PDF_0.pdf](#)
- [SC BEAD Grant Agreement for Wireline and Fixed Wireless](#)
- [SC BEAD Grant Agreement for LEO Projects](#)

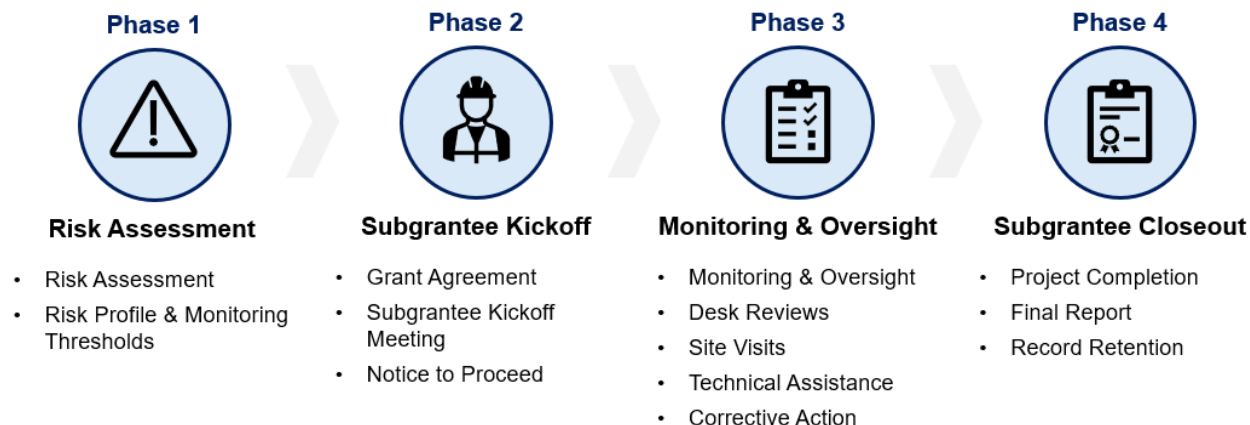
Application of Uniform Guidance to BEAD

Eligible Entities may issue fixed amount subawards for BEAD projects where the major purpose is broadband deployment regardless of whether the value of the subgrant exceeds the Simplified Acquisition Threshold for fixed amount subawards (\$250k+). Additionally, while the Uniform Guidance provides that fixed amount subawards generally cannot be used in programs which require mandatory cost sharing or match, NTIA has opted to keep all match requirements, even for fixed amount subawards. Further, grantees may still choose to treat subgrants as fixed amount subawards, and retain the benefits, even if the grantee requires subgrantees to submit evidence of costs (i.e., receipts), so long as the subgrantee identified does not exceed the allocated amount. The SCBBO has opted to follow the provisions and exceptions provided for by the NTIA pertaining to fixed amount subawards for BEAD subgrantees. As shown in the table below several requirements within 2CFR 200 are inapplicable if using a fixed amount subaward agreement.

The following apply to BEAD fixed amount subawards whose majority purpose is a broadband infrastructure project.	
Fixed Amount Subawards	<ul style="list-style-type: none">• Permits grantees to make fixed amount subawards for broadband infrastructure projects• Subgrantees may do so regardless of whether<ul style="list-style-type: none">○ The value of the subaward exceeds the Simplified Acquisition Threshold of \$250k and○ Notwithstanding the BEAD program's statutory match requirement○ Implications to budget modifications, match, monitoring, reporting and drawdowns
Cost Principles	<ul style="list-style-type: none">• Uniform Guidance cost principles rules do not apply to fixed amount awards
Procurement Standards	<ul style="list-style-type: none">• Provides an exception to the procurement standards contained in 2 CFR 200
Property Standards	<ul style="list-style-type: none">• Exceptions, adjustments, and clarifications for fixed amount subawards, including title, management and use requirements, liens, encumbrance and disposition.

The SCBBO's Phased Approach

The SCBBO will adopt a phased approach to monitoring subgrantees throughout the life cycle of the BEAD fixed amount subaward. This approach allows the office to tailor oversight activities to each stage of the deployment process, from initial planning and fund disbursement to project execution and closeout, ensuring that monitoring efforts are both timely and responsive to evolving program needs.



Phase 1: Subgrantee Risk Assessment

In accordance with [2 C.F.R. § 200.332\(c\)](#), the SCBBO will evaluate each subgrantee's risk of noncompliance with the activities and requirements of the BEAD subaward to determine the appropriate level of subgrantee monitoring. Each subgrantee will complete a risk assessment questionnaire to establish their initial risk profile. This profile will guide the level of monitoring and oversight provided by the SCBBO. To facilitate continued accuracy and appropriate oversight, subgrantee risk profiles will be periodically reassessed at ORS' discretion throughout the lifecycle of the award.

Risk Assessment

The SCBBO will assess each subgrantee's overall risk profile by examining three primary components: financial, programmatic, and when applicable, construction risk.

Definition	Example Evaluation Criteria	Level of Risk Posed
Financial Risk		
An assessment of a subgrantee's financial readiness and an evaluation of the SCBBO's financial exposure in relation to the level of funding allocated to the subgrantee.	1. BEAD subgrant award amount	Higher subaward amount = higher risk
	2. Strength of internal controls (e.g., financial management software, grant fund tracking protocols, documentation of expenditures)	Weak internal controls = higher risk
	3. Experience with federal funds (e.g., single audit history)	Weak or no single audit history = higher risk
Programmatic Risk		

An assessment of a subgrantee's risk in completing BEAD deployment subgrant activities as required in the Grant Agreement and an evaluation of the programmatic risk associated with the scope of service delivery, as indicated by the number of BSLs won across the state.	4. Total count of BSLs served with the BEAD subaward	Greater count of BSLs served = higher risk
	5. Past project management experience (including delays and defaults)	Weaker past project performance = higher risk
	6. Past project management experience in South Carolina	Less experience in South Carolina = higher risk
Construction Risk		
An assessment of a subgrantee's risk in successfully completing construction-related activities related to project area-specific broadband service delivery.	7. Permitting approach	Well-documented permitting approach = lower risk
	8. Site readiness protocols	Well-documented protocols = lower risk
	9. Contractor oversight methodology	Well-documented methodology = lower risk
	10. Safety and quality controls	Well-documented controls = lower risk

Note: Construction Risk is only assessed for projects that involve construction activities. It is not applicable to subgrantees deploying low-earth orbit satellite technologies.

Risk Profile & Monitoring Thresholds

Following the SCBBO's assessment of a subgrantee's financial, programmatic, and construction risk, an initial risk profile will be assigned. This profile will determine the level of oversight required to ensure the subgrantee remains compliant with the terms and conditions of the BEAD award, as well as all applicable federal, state, and local laws. Based on each subgrantee's risk profile, the SCBBO may adjust its monitoring activities accordingly, such as increasing the frequency of progress meetings, requiring more frequent reporting, or requesting greater detail in submitted reports.

<i>Risk Profile</i>	<i>Definition</i>	<i>Monitoring Level</i>
High-Risk	The subgrantee presents a high level of risk of non-compliance with applicable requirements.	Higher
Medium-Risk	The subgrantee presents a moderate level of risk of non-compliance with applicable requirements.	Moderately Higher
Low-Risk	The subgrantee shows a strong capacity for compliance and program execution, with minimal indicators of risk.	Standard

Phase 2: Subgrantee Kickoff

The subgrantee kickoff phase begins after the subgrantee risk assessment is complete and lays the foundation for successful and compliant program implementation by both the SCBBO and the subgrantee. Subgrantees may officially begin pre-construction activities once they have signed the Grant Agreement, participated in the subgrantee kickoff meeting with the SCBBO, and have received and acknowledged the Conditional Notice to Proceed.

Grant Agreement

Provisionally selected deployment subgrantees will be formally designated as BEAD Deployment Program subgrantees upon the mutual execution of the Grant Agreement by both the subgrantee and SCBBO following approval of the State's BEAD final proposal by the NTIA. The Grant Agreement outlines the minimum compliance requirements, as specified in the applicable guidance referenced above.

Subgrantee Kickoff Meeting

Following the execution of the Grant Agreement, each subgrantee will schedule a kickoff meeting with the SCBBO. This meeting serves as an opportunity to align expectations, clarify responsibilities, and establish a foundation for successful program implementation. Topics covered will include, but are not limited to, the following:

<i>Topic</i>	<i>Details</i>
Onboarding	<ul style="list-style-type: none">• Review of key milestones, build-out plans, and capital expenditure plans.• Introduction to the SCBBO points of contact and communication protocols.
Monitoring Expectations	<ul style="list-style-type: none">• Overview of the monitoring process and cadence based on the subgrantee's risk profile.• Discussion of permit requirements, site visits, desktop reviews, and documentation requirements.
Reporting	<ul style="list-style-type: none">• Review of reporting timelines, formats, and submission procedures.• Clarification of performance metrics and data collection expectations.
Site Visits	<ul style="list-style-type: none">• Tentative schedule for site visits• Site visit expectations
Technical Assistance	<ul style="list-style-type: none">• Overview of available resources and technical support services.• Establishment of procedures for raising concerns and requesting support throughout the project lifecycle.

Financial Management	<ul style="list-style-type: none"> • Expectations for budget tracking, invoicing, and financial reporting. • Review of allowable costs and documentation standards.
Record Retention	<ul style="list-style-type: none"> • All project documentation must be retained throughout the project and for the three years following project completion

Conditional Notice to Proceed

Following the execution of the Grant Agreement, the subgrantee risk assessment, and the subgrantee kickoff meeting, the SCBBO will issue a Conditional Notice to Proceed to the subgrantee. This notice, as outlined in *Exhibit C* of the Grant Agreement, authorizes the subgrantee to begin broadband deployment pre-construction activities. Once the subgrantee has acknowledged receipt of the Notice to Proceed and received their NEPA Record of Decision (ROD), the subgrantee may move forward with deployment in all project areas in accordance with the terms outlined in the Grant Agreement.

Phase 3: Monitoring & Oversight

The SCBBO is accountable per [2 C.F.R. § 200.332](#) to provide monitoring and oversight over subgrantees to facilitate proper use of BEAD funds and compliance with BEAD Program grant requirements. Accordingly, the SCBBO will implement structured monitoring activities throughout the entire lifecycle of the grant to monitor compliance with such requirements. Monitoring activities may include, but are not limited to, regular subgrantee reporting, desktop reviews, monitoring meetings, and site visits. All subgrantees will be subject to regular monitoring by the SCBBO. Those classified as medium or high risk may be subject to increased frequency or scrutiny during monitoring activities.

Reporting

In accordance with the [BEAD NOFO](#), the SCBBO will submit semiannual reports to the NTIA throughout the duration of the BEAD Program grant. To support this effort, subgrantees are required to report to the SCBBO at least semi-annually (twice a year), for the duration of the subgrant, to demonstrate effective use of funds and compliance with program requirements. As outlined in the Grant Agreement, these reports will include summaries of programmatic, construction and financial activities and will be submitted to the SCBBO at a regular interval. Further details on the reporting timeline and requirements can be found in *Exhibit F* of the Grant Agreement.

Subgrantees will submit reports to the SCBBO using standardized templates made available by the SCBBO on the ORS SC BEAD webpage. The SCBBO will roll up all subgrantee reporting in semi-annual reports to be submitted to the NTIA. Subgrantees identified as medium or high-risk may be required to submit reporting documentation more regularly and with a higher level of detail.

Desktop Reviews

The SCBBO will conduct periodic desktop reviews to evaluate subgrantee progress and compliance through review of documentation submitted during regular reporting intervals. Alongside written summaries of construction and financial activities, subgrantees will also be required to submit copies of permits obtained and all expenses accumulated in association with the BEAD Program. The SCBBO will review all BEAD-related expenses throughout the entire duration of the program.

Following the desktop review, the SCBBO will evaluate subgrantee compliance and determine whether corrective action is needed. Subgrantees identified as medium or high risk will undergo more frequent desktop reviews at the SCBBO's discretion to support greater oversight.

Monitoring Meetings

As outlined in the Grant Agreement, subgrantees are required to participate in regularly scheduled project progress meetings. Each subgrantee will designate a responsible contact who will maintain comprehensive knowledge of the project, can articulate project status, and can respond to inquiries regarding the project. The SCBBO will interface with the primary contact to schedule and conduct the progress meetings during which the subgrantee will report on project progress. The SCBBO may provide technical assistance during the meetings. One integral part of the monitoring meetings will be the identification of and regular compliance with required environmental and historic permitting. Subgrantees identified as medium or high risk will participate in monitoring meetings on a more frequent basis.

Site Visits

The SCBBO will conduct a minimum of two in-person site visits for construction-based projects over the course of the grant period. Additional site visits may occur on Projects that have been deemed higher risk.

The first visit will occur when the subgrantee reports that the project is approximately 50% complete. This visit will allow field staff to conduct audits to observe the construction site firsthand and verify reported progress. The field audits will at minimum assess network

construction and equipment against the submitted design specifications. SCBBO field staff will document any deficiencies and produce detailed reports, which will be submitted to the SCBBO to support timely corrective action.

The SCBBO will schedule a second and potentially final site visit of the project when all construction has been completed, the architect/engineer has conducted their own final inspection, and any deficiencies have been corrected. The final site visit will be attended by the SCBBO, the subgrantee, and the subgrantee's engineer. The SCBBO will provide the NTIA with reasonable advance notice so that a representative of NTIA may participate in the site visit, if so desired.

Technical Assistance

Apart from regularly scheduled progress meetings, the SCBBO will be available to provide ad-hoc technical assistance on an as-needed basis. Subgrantees may email the SCBBO directly at BEAD@ors.sc.gov or submit questions through an online comment form linked on the Office of Regulatory Staff (ORS) BEAD webpage. The SCBBO will maintain a document with Frequently Asked Questions (FAQ), which will be revised on a regular basis through the ORS BEAD webpage. All other BEAD guidance documents will also be posted on the webpage for easy reference.

Corrective Action

In the case where monitoring or reporting activities identify any errors, omissions, inconsistencies, or other instances of subgrantee non-compliance, the SCBBO will notify the subgrantee. As stated in the Grant Agreement, the subgrantee is required to promptly take any remedial action as required by the SCBBO. Furthermore, should the SCBBO determine that a subgrantee at any time during the Federal Interest Period (for wired or fixed wireless projects) or Period of Performance (for LEO projects) is no longer able to meet its obligations under the Grant Agreement, appropriate remedial action may be taken to maintain continuity of service.

In accordance with [2 C.F.R. § 200.332\(e\)\(2\)](#), the SCBBO may require corrective action to be taken on all significant developments that may negatively impact the BEAD subaward. Subgrantees will be required to provide the SCBBO with the necessary documentation on their plan for corrective action and any assistance needed to resolve the situation. The SCBBO will remain in regular communication with the subgrantee until the situation is remediated or resolved.

Phase 4: Subgrantee Closeout

At the conclusion of each subgrantee's project, monitoring activities will wrap up with the submission of documentation certifying that broadband service meets the BEAD Program requirements, along with a final report summarizing project activities. All BEAD Program subgrantees are required to complete deployment projects no later than the date agreed upon in the Grant Agreement.

Project Completion

Upon completion of the project, broadband service must be fully operational within the designated project area. As required by the NTIA, each subgrantee is responsible for conducting speed and latency tests¹ within each project area to ensure broadband service is consistent with the BEAD requirements.

Subgrantees are also required to verify BSL addresses are searchable through an online service signup search portal (as applicable) prior to the official project closeout. Subgrantees must report availability for the project area through the FCC bi-annual data submission process, including any missing or improperly attributed BSLs.

Please see the Grant Agreement for additional requirements.

Final Report

Within 30 days of project completion, each subgrantee will be required to submit final documentation to the SCBBO. This documentation includes, but is not limited to, the following:

1. Final financial and construction project reports;
2. As-Built documentation in GIS shapefile format (utilizing the SC BEAD Data Dictionary), depicting the final layout of broadband lines, junction points, homes, businesses, and community anchor institutions (CAIs);
3. Geotagged photographs captured within the project period of either complete or active construction inside the project area;
4. A post-construction list of BSL addresses along with speed and latency tests for consumers that subscribe to service;
5. A completed project closeout checklist; and

¹ See Proposed BEAD Performance Measures Guidance: https://www.ntia.gov/sites/default/files/2024-12/draft_performance_measures_for_bead_last-mile_networks_policy_notice.pdf

6. Any additional documentation the SCBBO requests as required by the Grant Agreement (see exhibit D), IIJA, BEAD NOFO, and BEAD Terms and Conditions.

Record retention

BEAD deployment subgrantees will be required to retain all federal award records through the Federal Interest Period (for wired or fixed wireless projects) or Period of Performance (for LEO projects) or longer where required by the U.S. Department of Commerce or 2 CFR §§ 200.334 through 200.338.

Conclusion

The BEAD Program in South Carolina plays a vital role in connecting unserved and underserved South Carolinians to reliable and cost-effective broadband. The SCBBO is committed to supporting subgrantees in delivering on that goal through robust BEAD Program monitoring and oversight. A connected South Carolina is paramount to foster stronger education, expanded opportunities, and increased economic activity across the state.