Nebraska Public Service Commission Capital Projects Fund (CPF) | Subrecipient Quarterly Report Instructions

The Capital Projects Fund, as administered by the Department of Treasury, requires that the Recipient¹ (the Nebraska Public Service Commission, or "Commission") collect certain data from the Subrecipients awarded funds through the grant program. The Commission is "required to monitor and oversee Subrecipients' use of funds and other activities related to the award to ensure that Subrecipients comply with the applicable statutory and regulatory requirements, and the terms and conditions of the award pursuant to 2 CFR 200.332."² The purpose of the Subrecipient Quarterly Report is to allow the Commission to collect the data necessary to complete the Project and Expenditure Report and the Annual Report and to perform the required monitoring and oversight of the Subrecipients' use of funds. Subrecipients must submit the completed Report no later than fifteen (15) calendar days after the end of each calendar year quarter during the period in which funds are available for expenditure.³ A listing of important dates for CPF-1 Subrecipients can be found on the Commission's website.

A Subrecipient that was awarded multiple projects must submit ONE quarterly report *per project awarded*. The information reported in the Quarterly Report must be responsive as it relates to the approved project, for the reporting period. Subrecipients are reminded that the Commission is collecting and reporting the information contained in the Quarterly Report to the Department of Treasury. Subrecipients **must** complete a new Quarterly Report for each reporting period. The data should be updated with the most current and accurate information as of the last day of the reporting period for which the Report is being submitted.

Subrecipients are highly encouraged to review the entire Subrecipient Quarterly Report and the Instructions *prior to* initiating the work necessary to complete the Quarterly Report. Subrecipients are asked to provide, in some instances, a high-level overview. Subrecipients will also be asked to report more granular-level details for certain topics. For questions or concerns on how to complete the Quarterly Report please email the Commission at <u>psc.broadband@nebraska.gov</u> or call the Grants Policy Analyst at 402-471-4571.

How to complete the Subrecipient Quarterly Report:

Section I: Project Overview

1. Subrecipient entity name: must match Section I, Item # 1. Applicant Name on the original <u>Grant</u> <u>Application</u> submitted by the Subrecipient for the approved project.

2. Project Name: must match Section II, Item # 1. Project Name on the original <u>Grant Application</u> submitted by the Subrecipient for the approved project.

3. Subaward Number: must match the subaward number assigned by the Commission. Subrecipients were notified of the subaward number via email on July 14, 2023.

4. Reporting Period: select the drop-down that accurately reflects the reporting period.

5. Point of Contact: current point of contact at the Subrecipient for the approved project. Subrecipients are encouraged to have one point of contact for all awarded projects.

¹ For purposes of the Capital Projects Fund - Broadband Infrastructure Program – the Nebraska Public Service Commission is the Recipient.

² <u>Coronavirus Capital Projects Fund Compliance and Report Guidance For States, Territories, and Freely Associated</u> <u>States</u>, page 1.

³ <u>Capital Projects Fund Grant Attestation and Agreement</u>, page 3.

6. Phone Number: the phone number for the Point of Contact for the Subrecipient.

7. Email: the email address for the Point of Contact for the Subrecipient.

8. Address Line 1: provide the street address for the Subrecipient.

9. Address Line 2: if necessary, provide additional address information. This field is not mandatory.

10. City: provide the city for the Subrecipient.

11. State: provide the standard two letter abbreviation for the state/territory of the Subrecipient.

12. Zip code: the five-digit zip code for the Subrecipient.

13. Tax ID number: the Tax ID number for the Subrecipient.

14. SAM UEI: the Unique Entity Identifier (UEI) from the System for Award Management (SAM.gov) for the Subrecipient.

15. Date of Award: the date the Commission issued the order awarding funds to the Subrecipient for the approved project. For CPF-1 Subrecipients, this date must be June 27, 2023.

16. Total Award Amount: the total amount of the award issued to the Subrecipient for the approved project. This amount must match Section 4. Amount of Federal Award in the Capital Projects Fund Grant Attestation and Agreement.

17. Type of owner for capital assets: select the dropdown that most accurately reflects the owner of the capital assets purchased with the grant funding. The dropdown options are: 1. Private; 2. State Government; 3. Municipal or Township Government; 4. County Government; 5. Tribal Government; 6. Cooperative; 7. Other.

18. A brief description with sufficient details to provide an understanding of the objective(s) and major activities that will occur through the Project: In narrative form, provide a brief description of the objective(s) and major activities that are necessary in order for the planned Project to be successful. The narrative should be succinct and concise. The Quarterly Report will collect more granular-level details in other sections.

Section II: Obligations and Expenditures

An "obligation" is the amount of funds that have been committed or obligated for the project, such as an order placed for goods and services, contracts, purchase orders, and similar transactions that require payment for allowable expenditures. Obligations are committing the entity to pay for goods/services using federal funds, but would not include the actual costs incurred or money spent on the commitments.

An "expenditure" is the amount that has been incurred as a liability of the entity (the service has been rendered or the good has been delivered to the entity). Expenditures are when the organization pays its bills, issues checks, or makes electronic payments and vendors are paid for obligations. Cumulative expenditures cannot be higher than current obligations or cumulative obligations.

19. Current period obligation: total amount of obligations made by the Subrecipient for the reporting period, for the approved Project.

20. Cumulative obligation: total amount of obligations to date for the period of performance of the approved Project.

21. Current period expenditure: total amount of expenditures made by the Subrecipient for the reporting period, for the approved Project.

22. Cumulative expenditure: total amount of expenditures to date for the period of performance of the approved Project.

23. Total Amount Budgeted for the Project from *all sources*: Enter the total amount that the Subrecipient has budgeted for the costs directly related to the construction of facilities for the approved Project.

24. Total Amount of CPF funding budgeted for the project: Must match #16, total award amount.

25. A brief description of the major activities on which funds were expended during the reporting period, including costs related to community engagement and any ancillary costs: in narrative form, provide a brief description of the major milestones that occurred during the reporting period for the approved Project. Milestones are any of the activities the Subrecipient has identified as necessary for the approved Project to be successful, including community engagement activities. The Subrecipient must report the total amount spent during the reporting period for community engagement activities in the brief narrative. Any other ancillary costs expended by the Subrecipient during the reporting period must be reported. Community engagement and ancillary costs are not allowable expenses for purposes of the Capital Projects Fund.

Section III: Project Status

26. Has the Subrecipient initiated the work necessary to complete the approved project? Select the appropriate check box that accurately reflects that status of the approved project. If "Completed less than 50%" is selected, indicate the actual percentage completed to date. If "Completed more than 50%" is selected, indicate the actual percentage completed to date. If "Completed, indicate the actual date the actual percentage completed to date. If "Completed, indicate the actual date the actual date the approved project was completed.

27. Projected Construction Start Date: If "project status" #26 is "not started," "completed less than 50%," or "completed more than 50%" the Subrecipient must complete this field and indicate the date that it reasonably believes, as of the last day of the reporting period, that construction will *start*. Must use XX/XX/XXXX date format to be responsive.

28. Projected Construction Completion: If "project status" #26 is "not started," "completed less than 50%," or "completed more than 50%" the Subrecipient must complete this field and indicate the date that it reasonably believes, as of the last day of the reporting period, that construction will *end*. Must use XX/XX/XXXX date format to be responsive

29. Projected Initiation of Operations: If "project status" #26 is "not started," "completed less than 50%," or "completed more than 50%" the Subrecipient must complete this field and indicate the date that it reasonably believes, as of the last day of the reporting period, that it will be able to initiate operations of the broadband network. Operations have been "initiated" if serviceable locations can begin requesting broadband service from the Subrecipient as a result of approved Project. Must use XX/XX/XXXX date format to be responsive

30. Actual Construction Start Date: If "project status" #26 is "completed less than 50%," "completed more than 50%," or "completed" the Subrecipient must complete this field and indicate that date that construction actually started for the approved project. Must use XX/XX/XXXX date format to be responsive.

31. Actual Construction Completion: If "project status" #26 is "completed" the Subrecipient must complete this field and indicate that date that construction was completed for the approved project. Must use XX/XX/XXXX date format to be responsive.

32. Have operations been initiated: Indicate Yes or No. Operations have been "initiated" if serviceable locations can begin requesting broadband service from the Subrecipient as a result of approved Project.

33. Actual Operations Date: If #32 is yes, provide the actual date operations were initiated.

34. Operations Explained: If construction has been **completed**, but operations have not been initiated, provide a brief explanation as to why operations have not been initiated. Subrecipients are required to respond if the answer to #26 is "completed" and the answer to #32 is "no".

35. Provide a list of the key milestones necessary to complete the approved project. Provide a brief description of each key milestone: The Subrecipient should select from the appropriate dropdowns, in order, the key milestones necessary for project implementation and deployment. The options in the dropdown are:

- Design and Engineering this includes all work necessary to design and provide engineering necessary to deploy the facilities approved for funding for the project.
- Permitting approvals this includes all permits, rights or way, pole attachment agreements, etc. necessary to deploy the facilities approved for funding for the project. Provide a brief description of the work necessary to complete this milestone.
- Secured Contractors if the Subrecipient will utilize contractors for any aspect of the approved project deployment. Provide a brief description of the work necessary to complete this milestone.
- Purchase Materials this includes fiber, conduit, vaults, electronics, etc. necessary to deploy the facilities approved for funding for the project. Provide a brief description of the work necessary to complete this milestone.
- Construction of Network the actual construction (underground or aerial) of the project. Provide a brief description of the work necessary to complete this milestone. Subrecipients that have identified "phases" construction of the network should provide the different "phases".
- Electronics Deployed all network electronics necessary to make the broadband network operational. Provide a brief description of the work necessary to complete this milestone.
- Network Testing any testing of the broadband network to ensure that it is functional, operational and provides the required broadband speeds. This is NOT meant to include speed testing required prior to disbursement of remaining grant funds which should be captured in the "close-out activities" milestone. Provide a brief description of the work necessary to complete this milestone.
- Initiate Service to Customers The broadband network is functional and customers can begin to request installation of service. To include "customer drop" activities. Provide a brief description of the work necessary to complete this milestone.
- Close-Out Activities Work necessary to complete the grant funding process, to include the <u>Certification of Project Completion</u>, <u>Speed Test</u> activities, a completion and submission of the <u>CPF Reimbursement Request</u>. Includes submission of the final close-out report to the Commission. Provide a brief description of the work necessary to complete this milestone.

Subrecipients should identify the key milestones necessary to complete the approved project. This data point is meant to be specific to a high-level overview of the milestones necessary to construct, deploy and operate the broadband network for the approved project area. This data point is *not* reporting period specific and should be updated quarterly to reflect the current plan to deploy the broadband network. Subrecipients should review and update quarterly, as appropriate and if necessary. Subrecipients will

report on their progress of *meeting* each milestone in #36, below. For each milestone, identify the projected timeline, to include when the Subrecipient believes work will begin and end.

36. Indicate the status of each key milestone: Subrecipients should report on the status of each key milestone identified in response to #35. Subrecipient should select the drop-down in the "status" field that best reflects the milestone's status as of the last day of the reporting period. Dropdown options for the status field are:

- Not started if the Subrecipient has not actively begun work necessary to complete the work necessary to achieve the goals of the key milestone.
- In Progress if the Subrecipient is actively working to complete the work necessary to achieve the goals of the key milestone.
- Complete when all work necessary to achieve the goals of the key milestone has been finalized and no further action is necessary.

For each key milestone, complete the "Additional Information" column. The Subrecipient should provide a brief status update for the key milestone. The status update should provide the Commission with information sufficient to have an understanding as to the progress made during the reporting period to complete the key milestone. In cases where the Subrecipient has identified a barrier to successfully and timely completing a key milestone, the barrier should be disclosed to the Commission, briefly, here and more fully described in #37.

37. Describe any challenges or issues encountered during the reporting period. Each challenge/issue should be separately identified and briefly described. Examples include supply chain delays, permitting delays, labor shortages, etc. Challenges or issues identified in a prior Quarterly Report that were resolved *prior to the current* reporting period should not be included. If a challenge or issue previously reported was not resolved prior to *the current* reporting period, that challenge or issue needs to be reported. If no challenges or issues were encountered during the reporting period, indicate the same.

38. Describe the solutions that were/will be implemented to mitigate the challenges or issues encountered during the reporting period. Each challenge/issue identified in #37 above should have a corresponding solution identified and briefly described.

Section IV: Required Performance Indicators and Project Data

Subrecipients are required to update the relevant data points in this section on a quarterly basis, based on the actual information known to the Subrecipient as of the last day of the reporting period. The planned technology type and actual technology type should always be consistent with the technology type approved in the original application, and should not change.

39. Project Technology Type (Planned): Select the **planned** technology for the approved project area. Dropdown options are: Fiber, Coaxial Cable, Fixed Wireless, Other. If Other, specify the **planned** technology for the approved project.

40. Project Technology Type (Actual): Select the **actual** technology for the approved project area. Dropdown options are: Fiber, Coaxial Cable, Fixed Wireless, Other. If Other, specify the **actual** technology for the approved project. Do **not report** this field if the approved project is still in the planning stages. Only report once the technology type has actually been purchased.

41. Total Miles of Fiber Deployed (Planned): this should be the total miles of fiber the Subrecipient is currently **planning** to deploy in the approved project area.

42. Total Miles of Fiber Deployed (Actual): this should be the total miles of fiber **actually** deployed as of the last day of the reporting period.

43. Total Number of Locations Served (Planned): this should be the total number of locations that the Subrecipient is currently **planning** on being able to serve once the broadband network has been deployed. The Commission expects that this number matches the number of locations to be served in the approved project plan. Specifically, the total number of locations that the Subrecipient projects they will be able to serve, if the location requested service, in the approved project area.

44. Total Number of Locations Served (Actual): this should be the total number of locations that the Subrecipient is capable of serving once the broadband network has **actually** been deployed and services are available in the approved project area. If the Subrecipient has not completed construction of the network and services are not yet actually available to customers in the project area, report "0". The Subrecipient should not report the number of subscribers in the approved project area.

45. Total Number of Locations Served by Broadband Speed Prior to CPF Investment: Subrecipients are required to report based on publicly available information, such as the National Broadband Map. Report the total number of locations that had broadband services available at speeds equal to or less than 25 Mbps download and 3 Mbps upload. Report the total number of locations that had broadband and 3 Mbps upload. Report the total and 3 Mbps upload, but less than 100 Mbps download and 3 Mbps upload. Report for all locations in the approved project area.

46. Total Number of Locations Served by Broadband Speed Post CPF Investment (Planned): this should be the total number of locations that the Subrecipient is currently **planning** to be able to serve in the approved project area once the broadband network has been deployed. The Subrecipient should report the total number of locations it is planning to be capable of serving at a minimum of 100 Mbps download and 100 Mbps upload.

47. Total Number of Locations Served by Broadband Speed Post CPF Investment (Actual): this should be the total number of locations that the Subrecipient is **actually** able to serve in the approved project area. The Subrecipient should report the total number of locations it is actually capable of serving at a minimum of 100 Mbps download and 100 Mbps upload.

48. Total Number of funded locations served, broken out by type (Planned): the Subrecipient should report the total number of locations, by type, that it **plans** to be able to serve in the approved project area once the broadband network is deployed. The Subrecipient should report the total number of planned residential locations, the number of total housing units, the number of businesses and number of community anchor institutions. *Subrecipients are encouraged to utilize the data created for the Projects Location Report to complete.*

49. Total Number of funded locations served, broken out by type (Actual): the Subrecipient should report the total number of locations, by type, that it actually is able able to serve in the approved project area. The Subrecipient should report the total number of actual residential locations, the number of total housing units, the number of businesses and number of community anchor institutions. Subrecipients are encouraged to utilize the data created for the Projects Location Report to complete.

50. Speed tiers offered and corresponding non-promotional prices, including associated fees, for each speed tier of broadband service: In the reporting period in which the Subrecipient is able to begin advertising the broadband services to locations in the approved project area. The Subrecipient should report all speed tiers that it is offering to locations in the approved project area. Attach additional pages as necessary.

Section V: Community Engagement

51. Provide the following information pertaining to community engagement activities performed within the reporting period: Subrecipient should report any community engagement activities for the approved project area. Data points required: Date, Time, Location, Purpose, No. Attending (if an event) and Intended Audience. *Subrecipients are required to complete a Community Engagement Form for each activity. See the Community Engagement Form and Instructions for additional information.* One Community Engagement Form per activity performed in the reporting period must be attached to the Quarterly Report.

52. Describe efforts made to engage with the local community and stakeholders served by the project. Subrecipients should briefly describe the efforts made, during the reporting period, to engage with the local community and stakeholders, in the approved project area.

53. Detail outreach, advertising, and language translation activities employed to reach consumers within the project area, including ACP outreach materials. Subrecipient should briefly describe the community engagement strategy to inform locations in the approved project area about the broadband project, service availability, and low-income offerings.

54. Describe how feedback received from communities, organizations, and constituents received prior to project award has been addressed during planning and construction.

55. Explain how the Subrecipient intends to support households with significant barriers to services, such as those with low incomes and limited English proficiency. Describe what languages were used in the community outreach materials, and why. If applicable, describe how funds will build capacity of community organizations to serve traditionally underserved groups. Subrecipient can utilize publicly available data, such as the U.S. Census, to describe the demographics of approved project area.

56. Describe plans to sustain, improve and grow future community engagement efforts. Please briefly describe planned community engagement activities. Examples could include, but are not limited to, efforts to inform the community about the planned broadband service offering, to reach low-income residents to increase enrollment in low-income offerings and subsidy programs like the ACP, and plans to reach residents with low English proficiency.

Section VI: Risk Assessment

In this section, Subrecipients should respond based on the internal control mechanisms and policies and procedures of the Subrecipient. As applicable, include any internal control mechanisms and policies and procedures that are specific to the approved project.

57. Describe the project planning and management in place, including the project team, project plan and budgeting processes. Attached additional pages as necessary: Subrecipient should report the names and qualifications of the member of the project team. Subrecipient should provide a brief description of the project plan and budgeting process.

58. Describe processes in place to ensure regulatory compliance, such as legal review, to ensure compliance with all relevant local, state, and federal regulations and reporting. Subrecipient should provide a brief description of the processes it has in place to ensure regulatory compliance, to include, but not limited to, legal review, with all relevant local, state, and federal regulations and reporting.

59. Describe financial management processes in place, such as expense management, to monitor and track expenses at a project level, maintaining a clear audit trail for all financial transactions related to the grant including invoices, receipts, and payment records, and other internal controls to prevent fraud, waste and abuse of grant funds: Subrecipient should briefly describe the internal control mechanisms,

and policies and procedures established, to ensure a clear audit trail for the approved project. Describe the tracking methods established to ensure expenses are tracked at the project level, to include as necessary any cost allocation guidelines established by the Subrecipient to appropriately track expenses at the project level.

60. Describe the process for tracking time and effort of direct labor costs related to this broadband deployment grant. This could include identification of personnel working on the broadband deployment project, description of time tracking through a timekeeping system or daily tracking, task classification, documentation and the process in which the recorded time is allocated to the associated cost objective: Subrecipient should briefly describe the internal control mechanisms, and policies and procedures established, to ensure direct labor costs are appropriately accounted for the approved project. Describe the tracking methods established to ensure direct labor costs are tracked at the project level, to include timekeeping, daily tracking, task classification and other documentation as appropriate. Subrecipients that will not be requesting direct labor costs can indicate the same to be responsive.

61. Identify potential risks to the approved project's success, such as weather delays, technical challenges, or unexpected costs. Subrecipients should describe potential risks it has identified to the success of the approved project, which may include weather delays, technical challenges or unexpected costs.

62. Detail any changes in key personnel that could impact project implementation: Subrecipient should disclose any changes in key personnel during the reporting period. If key personnel is/are no longer working on the project, what is the mitigation plan in place for the approved projects implementation and deployment of broadband services?

63. Has there been high staff turnover or company organization that could impact the success of the approved project? Subrecipient should disclose if there has been high staff turnover, or a company reorganization, during the reporting period. What is the mitigation plan in place for the approved projects implementation and deployment of broadband services?

64. Detail any changes in systems/technology used by the Subrecipient that could impact project implementation: Subrecipient should disclose whether there have been any changes in systems that could impact project implementation during the reporting period. What is the mitigation plan in place for the approved projects implementation and deployment of broadband services?

65. Is the Subrecipient currently or previously suspended or debarred from receiving federal funds? If yes, indicate Year of suspension or debarment. If no, select No. If yes, provide a brief explanation.

66. Provide information about prior federal award experience and share the results of audits, if applicable. Subrecipients must ensure that the Commission is made aware of any results of audits for prior federal awards, during the performance period of the approved project.

Section VII: Compliance and Documentation

67. Please detail any regulatory compliance matters and reporting requirements not previously disclosed. Subrecipient should provide a narrative explanation of any regulatory compliance or reporting requirements that should be brought to the Commissions attention that has not previously been disclosed in a prior section(s) of this Quarterly Report. Subrecipient can indicate "not applicable, or N/A" if there is no further information to provide.

Section VIII: Additional Comments

68. Please provide additional information or insights about the approved project that you believe are relevant to the project's performance and impacted community. Subrecipient should provide a narrative explanation of additional information or insights about the approved project that it believes is relevant to the project's performance and impacted community to which the Commission should be made aware.

Section IX: Attachments

NOTE: Please label attachments as follows: "[Applicant Name]_[Project]_[Attachment Letter]." If it is necessary to submit multiple attachments under one attachment letter category, label the attachments to identify the separate attachments. Ex. "[Applicant Name]_[Project]_[Attachment Letter]_1", "[Applicant Name]_[Project]_[Attachment Letter]_2", etc.

Attach all relevant support documents, including, but not limited to:

- <u>CPF-1 Projects Location Reporting Template</u> containing location-specific data using FCC's standardized identifiers and fabric identification number for each location within the grant-funded area. (Attachment Letter: A)
- Community Engagement Forms demonstrating specific community engagement details. One form should be completed for each outreach activity conducted during the reporting period. (Attachment Letter: B)
- Community Engagement Outreach Tracking providing the expenses associated with each outreach activity. This form should be *cumulative* for all outreach activity for the awarded project. (Attachment Letter: C)
- Additional pages as necessary to be responsive to the data collected for this reporting period. (Attachment Letter: D). Additional documentation may include:
 - Community Outreach Material (not otherwise included with the Community Engagement Form)
 - Listing of Project Staff and their qualifications
 - Mitigation plan to address project risks (if applicable)

Other relevant supporting documentation. (Attachment Letter: E)

Complete the form with a signature of the authorized person for the Subrecipient. Once complete, select "Submit Form" to email the form to the Commission.