

**INTERNET
FOR ALL**

Applicant Orientation to the Digital Equity Competitive Grant Program and Grants Administration

August 2024



Disclaimer



This document is intended solely to assist applicants in better understanding the Digital Equity Competitive Grant Program and the requirements set forth in the Notice of Funding Opportunity (NOFO) and follow-on policies and guidance for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFO, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.



Introduction

The purpose of this training is to provide potential applicants of the Digital Equity Competitive Grant Program (Competitive Grant Program) with an overview of the program and an introduction to federal grants. This training is intended to assist applicants in better understanding the responsibilities of grants administration and what will be required of potential grant recipients.

TRAINING GOALS

- 1 Walkthrough an overview of the **Digital Equity Competitive Grant Program**
- 2 Understand the **NTIA grants environment**
- 3 Understand the **responsibilities and requirements of each phase of the Grant Lifecycle**
- 4 Explore **additional resources**

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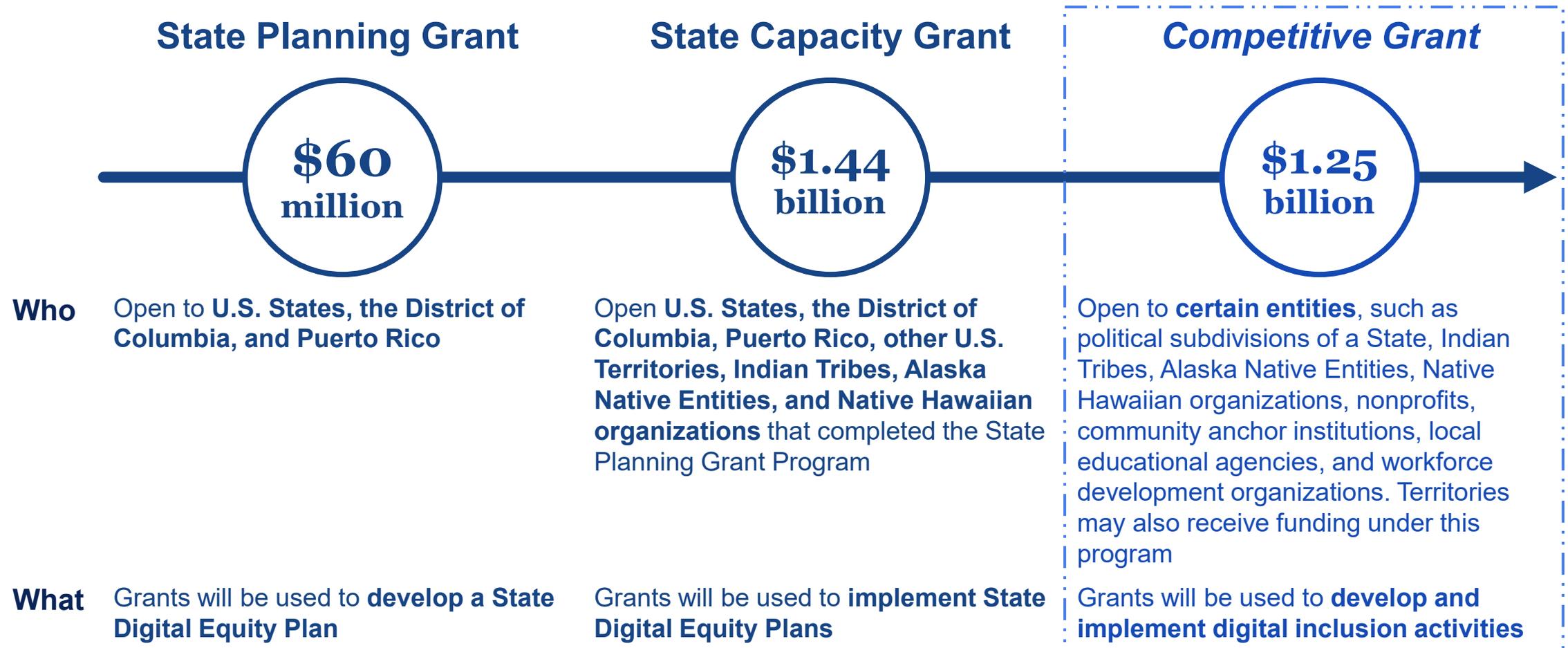
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Introduction to the Digital Equity Competitive Grant Program

The Digital Equity Act & the Competitive Grant Program



The Competitive Grant Program is the third digital equity funding opportunity authorized by the Digital Equity Act.



Competitive Grant Program: Covered Populations



The Competitive Grant Program seeks to serve the Covered Populations as defined in the Digital Equity Act (**47 U.S.C. §1721(8)**). Awards will *focus on addressing* the needs of the Covered Populations **not met** by the Capacity Grant Program.



Individuals who live in **covered households** (defined as households with **income of not more than 150% of the poverty level**)



Individuals with **disabilities**



Aging individuals



Individuals with a **language barrier**, including individuals who are English learners and have low levels of literacy



Incarcerated individuals (as defined by the State or Territory), other than individuals who are incarcerated in a Federal correctional facility



Individuals who are members of a **racial or ethnic minority group**; and



Veterans



Individuals who primarily reside in a **rural area**

Note: For more information on the Capacity Grant Program and to view the Capacity Grant Program Notice of Funding Opportunity and Applicant resources, visit: broadbandusa.ntia.doc.gov/funding-programs/Digital_Equity_Capacity_Grant_Program.



Serving the Covered Populations



Achieving digital equity is vital to promoting personal welfare and civic engagement of the *Covered Populations*, focusing on issues like lack of telehealth services, online jobs, etc.

IMPACTS OF DIGITAL EQUITY:



Economic and Workforce Growth

Through increased job opportunities and business growth



Educational Expansion

By tailoring accessible learning and upskilling opportunities to individual needs and preferences



More Individual Control of Health

From improved access to telehealth and increased health literacy



Improved Civic/Social Engagement & Delivery of Essential Services

Through increased participation in community events and access to services to improve their quality of life



COMMITMENT TO AFFORDABLE, RELIABLE, HIGH-SPEED INTERNET

Recognizing the devastating impact of digital exclusion, President Biden made a **commitment that everyone in America will have access to affordable, reliable, high-speed internet service.**



Introduction to Grants

What Is a Grant?

The Digital Equity Act provides funding through grant programs, like the Competitive Grant Program. A grant is a form of **federal financial assistance** which provides awards to a recipient to carry out public services and/or specific goals identified in a law, such as the Digital Equity Act. Unlike a loan, **no repayment is required***.



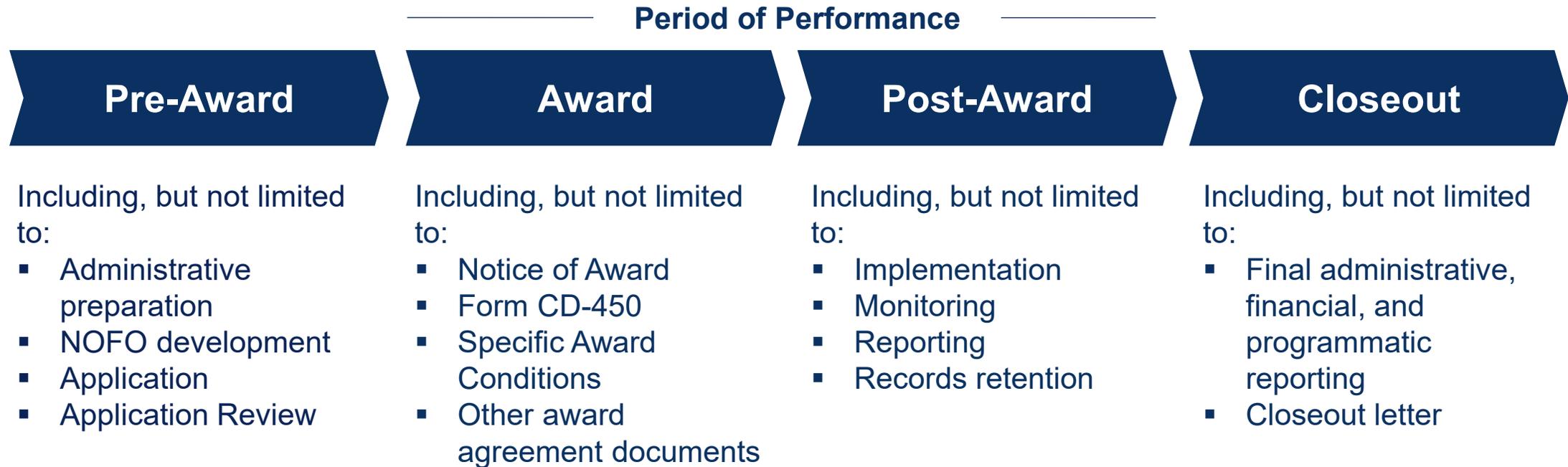
May not happen at the same time!

*Recipients may be required to return the funds if they use them for unallowable costs or ineligible activities, fail to comply with grant terms and conditions, do not meet performance goals, or if an audit reveals mismanagement or misuse of funds. Additionally, repayment may be necessary if there are findings of waste, fraud, or abuse, or if the grant is terminated by the federal agency.

Grant Lifecycle



There are **four unique stages** to the federal grant lifecycle, each with specific grants administration activities.

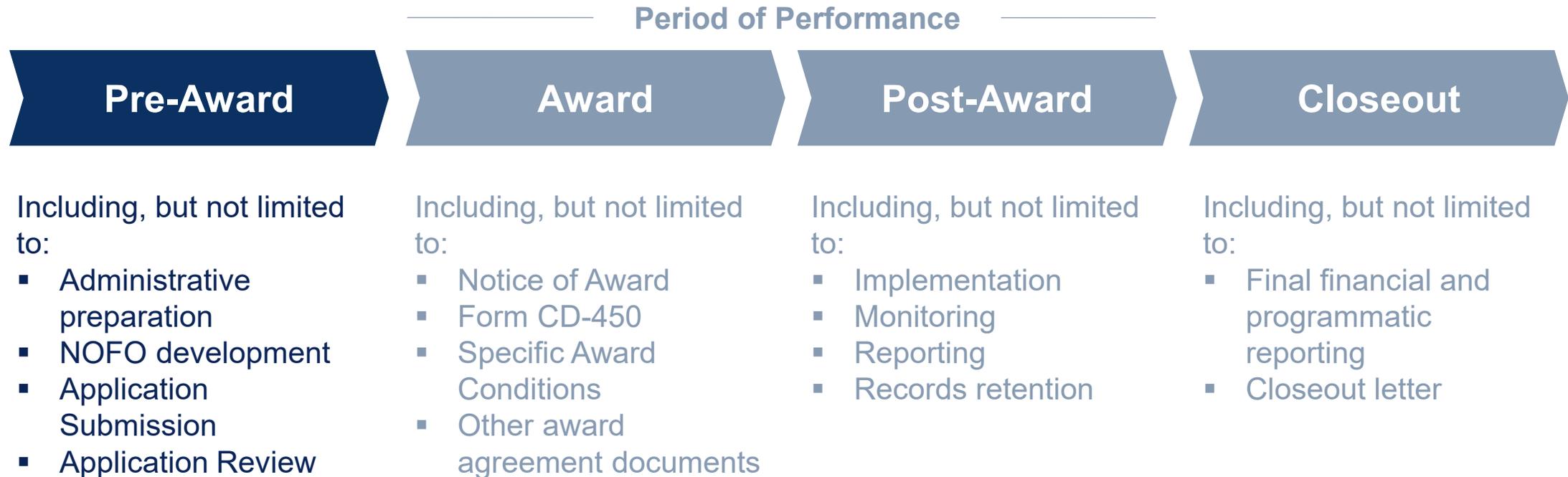


Pre-Award Phase

Pre-Award Phase



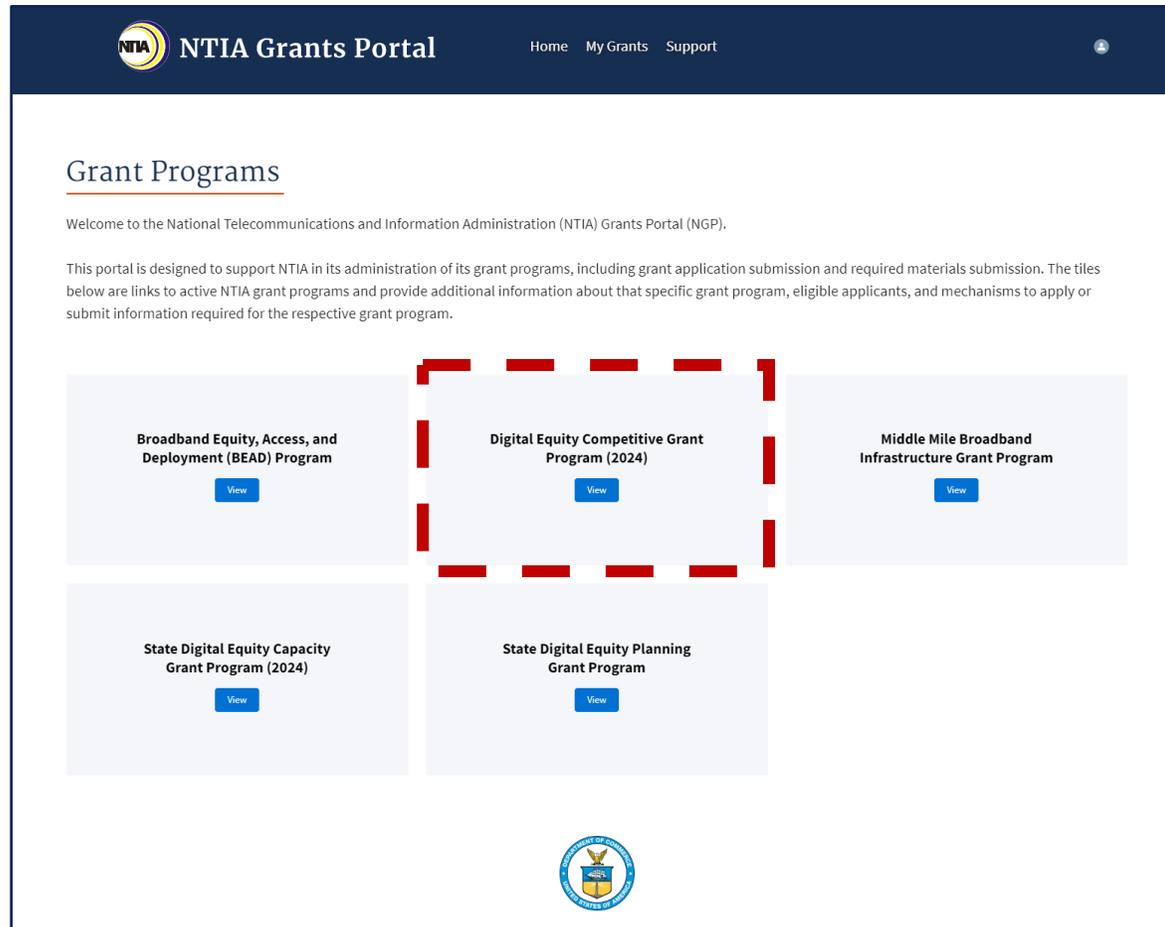
The Pre-Award phase is the first phase in the grant lifecycle and is **most relevant to potential applicants**.



NTIA Grants Portal (NGP)



While some Digital Equity Act programs allow paper or hard copy application submissions, the Competitive Grant Program applications must be received through the NTIA Grants Portal (NGP).



Application materials and instructions can be found on the NGP. **The NGP can be accessed at <https://grants.ntia.gov/>.** From the Grant Programs page, **click the Learn More button** under the program title to reach the program home page. **Log in with your account or create an account if you don't have one.** **Additional instructions will be available in the Application Guidance.**



System for Award Management (SAM)



All applicants must register with SAM before submitting an application pursuant to this program as outlined in the NOFO Section IV.E.2.

- ✓ Applicants must provide **evidence of the applicant's registration on SAM.gov.**
- ✓ Applicants need to **upload an exported DF of the SAM.gov profile** of the identified applicant.
- ✓ Applicants must ensure that the documentation includes the following:
 - Legal Name;
 - SAM Unique Entity ID (UEI); and
 - Expiration date of the registration

New SAM.gov Users

Applicants who are new to SAM.gov may register their entity or receive a UEI by signing into SAM.gov and selecting "Get Started," then "Register Entity." The free annual registration process in SAM.gov **generally takes between 3 and 5 business days but can take more than three weeks.** Applicants should register early.



General Applicant Information



Applicants should reference the specific Competitive Grant Program application guidance documents when completing their general applicant form.



General Applicant Information

General information about who is applying for the program

REQUIREMENTS

- ✓ Applicants must provide SAM.gov registration information and evidence.
- ✓ Applicants must select their Eligible Entity type and provide evidence of their entity type status.
- ✓ If applying as a partnership of Eligible Entities, applicants must submit information about each partnership member and a Letter of Commitment from each partnership member.
- ✓ Applicants must provide all required documentation detailed in the NOFO.
- ✓ If the applicant is a U.S. Territory applying for the Territorial set aside, the applicant must submit a letter from the governor (or equivalent official) of the U.S. Territory that authorizes the applicant to apply



Standard Form 424 (SF-424)



The Standard Form 424 (SF-424) is a standard federal form that provides basic information about the applicant. Every federal grant applicant is required to fill out the SF-424.

Standard Form 424: Application for Federal Assistance



Applicants are required to fill out, directly in the NTIA Grants Portal, an SF-424 Application for Federal Assistance.



Applicants are encouraged to fill out the SF-424 template available on the NGP and program webpage prior to filling out the form on the NGP.



Instructions on how to complete the SF-424 can be found on the grants.gov website, or at this link: www.grants.gov/forms/forms-repository/sf-424-family



Other Standard Application Forms



Applicants have additional standard federal forms that they must submit by the application deadline.

Standard Forms

Aside from the specific forms required for the grant application, there are also numerous **standard forms** that must be submitted. These are all accessible online on the program page in the **NTIA Grants Portal**.

Form CD-511

Certification regarding lobbying

Standard Form LLL

Disclosure of lobbying activities



Note: All additional documents should be signed by the Authorized Organization Representative (AOR) identified in the SF-424. Ensure that the name listed and the signature match.



Consolidated Budget Form



Applicants must be prepared to provide detailed budget information in the required format, the Consolidated Budget Form.



Consolidated Budget Form

Information on the dollar amounts for the projects/activities



Applicants should attend additional training that is provided on the Consolidated Budget Form.

Budget Overview

NOTE: All values in rows 5-18 are locked. Any errors found should be fixed on the corresponding budget detail tab.
Cells B21 and B22 are not locked and should be used to specify the total expenses how much of the total proposed
Cells B23 and B24 are locked and will populate the total matching contribution and total additional supplementary f

	Fiscal / Project Year 1		
Budget Category	Federal Request	Matching Contribution	Total
A. Personnel			
Salary			
Fringe			
B. Travel			
C. Equipment			
D. Supplies			
E. Contractual/Subawards			
Contracts			
Subawards			
F. Construction			
G. Other Direct Costs			

Instructions Projects Overview **Budget Overview** Year

Consolidated Budget Form

The Consolidated Budget Form must support the dollar amounts identified in the SF-424 and demonstrate that the project or activity meets the eligible use requirements in the Digital Equity Act and the Competitive Grant Program NOFO. It will provide detailed project costs/summary and justification.

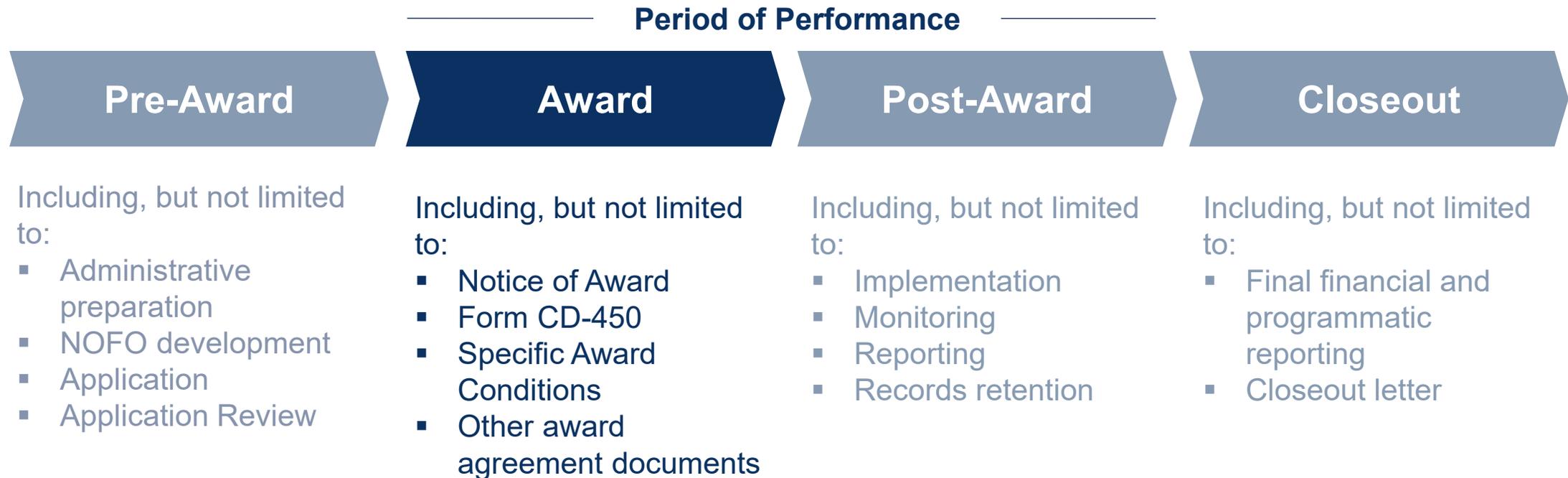


Award Phase

Award Phase



The Award phase is the second phase in the grant lifecycle and is marked when the Applicant is notified that its application has been approved for funding. The Applicant accepts the Award offer by signing the Financial Assistance Award Document (Form CD-450).



Note: Upon signing the Form CD-450, an "Applicant" becomes a "**Recipient**"



Award Terms and Conditions



Recipients must follow the terms and conditions in the CD-450. By signing the CD-450, recipients accept and become legally obligated to carry out the full terms and conditions of the grant and federal statutory and regulatory requirements.

FORM CD-450 (REV. 04/17)	U.S. DEPARTMENT OF COMMERCE	<input checked="" type="checkbox"/> GRANT	<input type="checkbox"/> COOPERATIVE AGREEMENT
FINANCIAL ASSISTANCE AWARD		FEDERAL AWARD ID NUMBER	
RECIPIENT NAME	PERIOD OF PERFORMANCE 03/01/2018 - 02/29/2020 *		
STREET ADDRESS	FEDERAL SHARE OF COST \$250,000.00		
CITY, STATE ZIP	RECIPIENT SHARE OF COST \$62,500.00		
AUTHORITY	TOTAL ESTIMATED COST \$312,500.00		
CFDA NO. AND NAME			
PROJECT TITLE:			
<small>This Award Document (Form CD-450) signed by the Grants Officer constitutes an obligation of Federal funding. By signing this Form CD-450, the Recipient agrees to comply with the Award provisions checked below and attached. Upon acceptance by the Recipient, the Form CD-450 must be signed by an authorized representative of the Recipient and returned to the Grants Officer. If not signed and returned without modifications by the Recipient within 30 days of receipt, the Grants Officer may unilaterally withdraw this Award offer and de-obligate the funds.</small>			
<small>DEPARTMENT OF COMMERCE FINANCIAL ASSISTANCE STANDARD TERMS AND CONDITIONS (31 March</small>			

Form CD-450 *Department of Commerce Financial Assistance Award*

This is the document the Grants Officer uses to authorize and issue the award. Within 30 days, the recipient's AOR must sign and return this form to accept the award and the terms and conditions that accompany it. If the CD-450 is not signed within 30 days of receipt, the Grants Officer may unilaterally withdraw the Award offer and de-obligate the funds.

An award will come with a series of terms and conditions that must be followed. In certain circumstances, award funds will be placed on hold via a Specific Award Condition (SAC), which is a term that must be satisfied prior to release of funds to the recipient.



What is a SAC?



A SAC is a term that is unique to a particular award. Among other things, a SAC may place award funds on hold, and request certain information from the recipient prior to funding release.



If a funding hold SAC is placed on an award, a recipient cannot access or use grant funds, or sometimes even begin the performance on the award or certain activities, until they demonstrate that the requirements are satisfied, and the SAC is subsequently removed by NTIA and National Institute of Standards & Technology (NIST).



If grantees or subgrantees do not adhere to the terms and conditions (i.e., use funds that are restricted), they may be **noncompliant with the State Digital Equity Competitive Grant Program** and face enforcement actions.

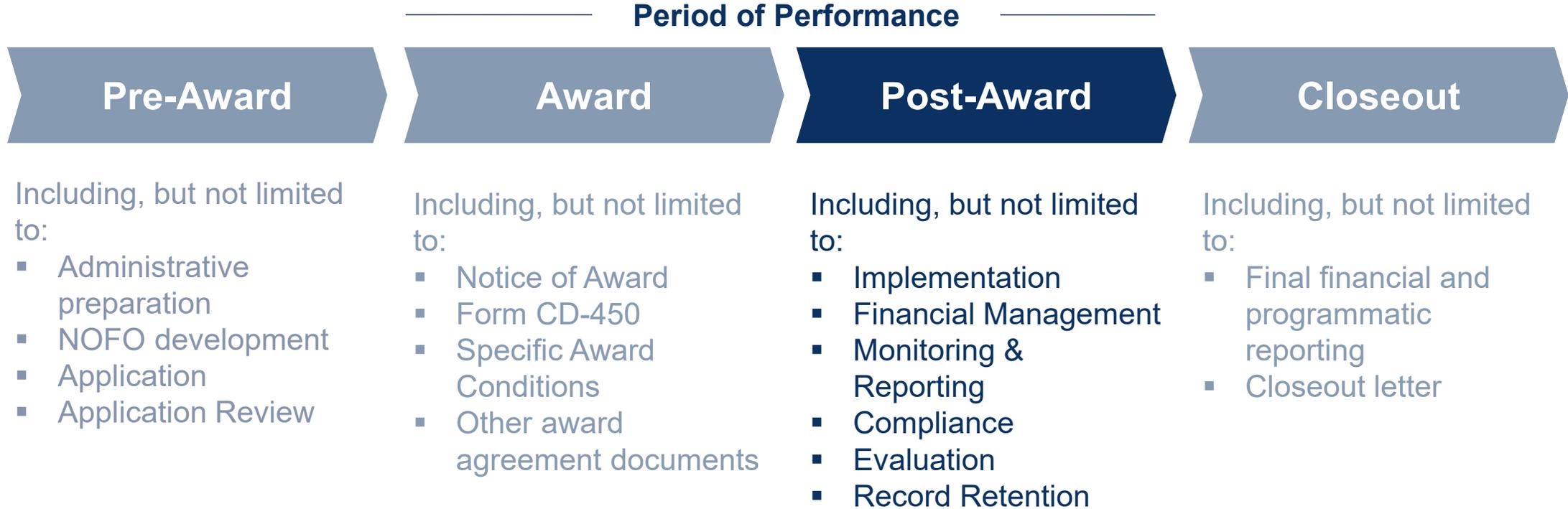
Note: While similar, SACs and General Terms and Conditions for grants differ. General Terms and Conditions apply to a wider range of recipients - some apply to all NTIA Department of Commerce recipients, or to all recipients of a particular grant program. SACs are more individualized, and apply to recipients on an individual basis.



Post-Award Phase

Post-Award Phase

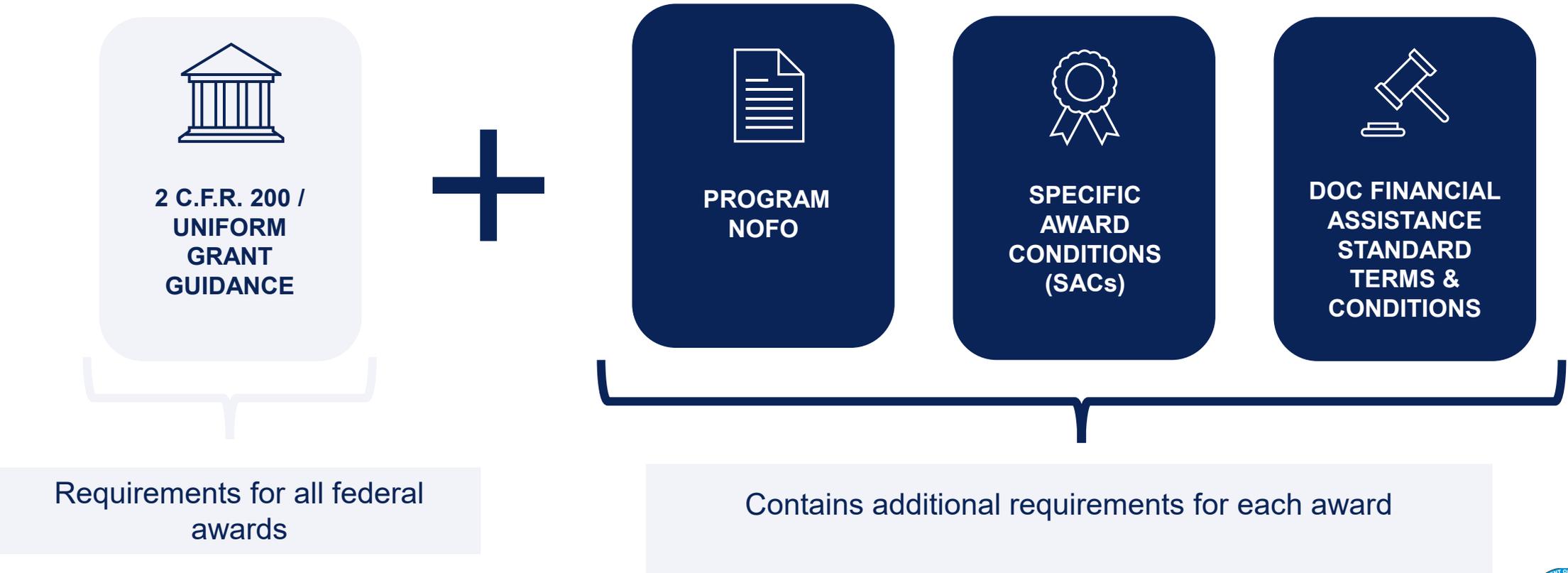
The Post-Award phase is the third phase in the grant lifecycle and marks the start of the recipient's programmatic and **grants administration responsibilities**.



Who Decides the Rules of Grants Administration?



2 C.F.R. 200, also known as the **Uniform Grant Guidance**, provides rules for all federal grant programs, in addition the Digital Equity Act grants have **grants administration requirements** that are unique to each program



What Makes Up Grants Administration?



Grant administration comprises several **programmatic** and **financial** activities that typically can be broken down into three categories:

POLICIES & PROCEDURES

- The “rules” governing the grant
- Allowable vs. unallowable costs
- SOPs for activities like drawdown, any unfunded grant actions, etc.

MONITORING & OVERSIGHT

- Activities that oversee financial and programmatic progress of the grant
- Ensures federal funds are being spent in a reasonable, allowable way

REPORTING COMPLIANCE

- Includes standard Federal Financial Reports (SF-425) and programmatic reporting
- May also include program specific milestones/reporting requirements



Roles in Grants Administration



NIST Roles (Grants Office)

- Grants Officer (GO)
- Grants Specialist (GS)
- Federal Assistance Law Division (FALD)
- Notice of Funding Opportunity (NOFO) Coordinator



NTIA Roles (Program Office)

- **Federal Program Officer (FPO)**
- Selecting Official



Non-Federal Entity (NFE) Roles

- Authorized Organizational Representative (AOR)
- Authorized Representative (AR) of a partnership
- Principal Investigator/Project Director (PI/PD)
- Key Personnel
- Members of a partnership

Key Federal Roles & Responsibilities



- While NTIA administers the Digital Equity Act programs, the administration also partners with several federal agencies to assist in grants management.
- NTIA partners with the National Institute of Standards and Technology (NIST) Grants Management Division to manage Digital Equity Act grant activities.
- In addition to NIST, recipients use the U.S. Department of Treasury’s Automated Standard Application for Payments (ASAP) system to draw down funds.

Digital Equity Federal Program Officers (FPO)	NIST Grants Officer and Grants Specialist
<ul style="list-style-type: none"> ✓ Monitor and oversee work conducted under an award, compare the actual accomplishments with the goals and objectives established in the award ✓ Provide programmatic guidance and technical assistance to recipients ✓ Review and evaluate reports, including financial, performance, and technical for consistency with the approved project 	<ul style="list-style-type: none"> ✓ Oversee the business management and administrative aspects of grants ✓ Approve awards and amendments ✓ Ensure recipient's compliance with Special Award Conditions (SACs) ✓ Ensure that each award complies with applicable statutes, regulations, Office of Management and Budget (OMB) guidance, Executive Orders, and Department of Commerce (DOC) policies



Policies and Procedures Overview



Established and approved policies, processes, and procedures are fundamental to managing Digital Equity Act grants as they create a consistent understanding of expectations between NTIA, recipient officials, and subrecipients.

Example policies and procedures may include:

- Procurement Policy
- Record Retention Policy
- Subrecipient Selection Policy
- Subrecipient Monitoring Policy
- Time Tracking Policy
- Waste, Fraud and Abuse Policy
- Payroll policy



Compliance



Documented policies, processes, and procedures not only support digital equity activities, but also help ensure the recipient is **compliant** with national requirements.



Information Requests

Digital Equity-related information requests may be made as part of, or outside of, an ongoing audit.



Audits

All projects must comply with federal and DOC/NTIA audit requirements.



Administrative & National Policy Requirements

Grant recipients must comply with applicable federal statutes, rules, regulations, and other program requirements incorporated by reference into the terms and conditions of Competitive Grant Program awards.



Environmental & National Historic Preservation

Environmental regulations stated in the award conditions, and within their timeframes, must be fulfilled. This includes meeting the National Environmental Policy Act (NEPA) review, which can require an Environmental Assessment (EA).



Monitoring & Reporting Requirements

Recipients are required to adhere to both 2 C.F.R. 200 monitoring and reporting requirements **and** requirements outlined in the Competitive Grant Program NOFO and terms and conditions that apply to their award. Monitoring for each Digital Equity Act Program may include site visits, desk reviews, technical assistance, and a random sampling of compliance requirements.



“The recipient and subrecipient are responsible for the oversight of the Federal award. The recipient and subrecipient must monitor their activities under Federal awards to ensure they are compliant with all requirements and meeting performance expectations. Monitoring by the recipient and subrecipient must cover each program, function, or activity.”

**2 C.F.R. 200.329, as updated by OMB in the
Federal Register on April 22, 2024**



“ [NTIA shall] Develop monitoring plans, subject to the approval of the Assistant Secretary, which may include site visits or desk reviews, technical assistance, and random sampling of compliance requirements.”

Competitive Grant Program NOFO

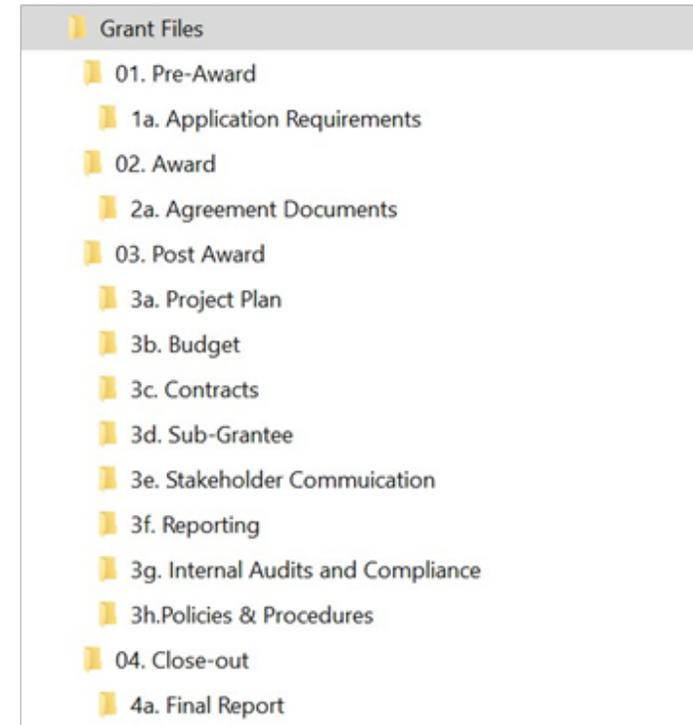
Creating a Grant File

Maintaining an organized grant file, inclusive of all policies and procedures, can minimize recipient risk while improving the efficiency of grant-related activities, such as reporting and information requests.



Why is Documenting Policies and Procedures Important?

- Proper policy documentation allows for an **effective compliance management** system that maintains consistency throughout the grant's lifecycle
- Documenting processes helps prepare a recipient for **potential audits** where historical decisions need to be explained
- Organized and documented policies will help recipients quickly and easily provide requested documents to NTIA during **monitoring**



Example Recipient Grant File

Grant Monitoring vs. Auditing



NTIA and the NIST will monitor Digital Equity Act Program grants to ensure compliance with federal regulations and grant terms to avoid and correct any potential issues. Monitoring is not the same as auditing!

Monitoring	Auditing
Includes both fiscal compliance and programmatic performance , and through tools such as technical assistance, is intended to guide recipients in best practices.	Solely focused on fiscal compliance and not concerned with whether the program achieves its goals, the impact on end users, or the strategic value of one type of expenditure vs. another.
Occurs on a regular basis and is in the form of site visits and desk reviews . Grant recipients will be notified of any site visits in advance.	Occurs when the non-Federal entity expends \$1,000,000 or more during the non-Federal entity’s fiscal year in federal awards.
Types of activities reviewed during a site visit or desk review: <ul style="list-style-type: none"> - Organizational structure and governance - Contracts, subrecipient, and procurement policies - Financial management policies and procedures - Programmatic activities 	Types of activities reviewed during an audit: <ul style="list-style-type: none"> - Financial statements - Internal controls for accounting

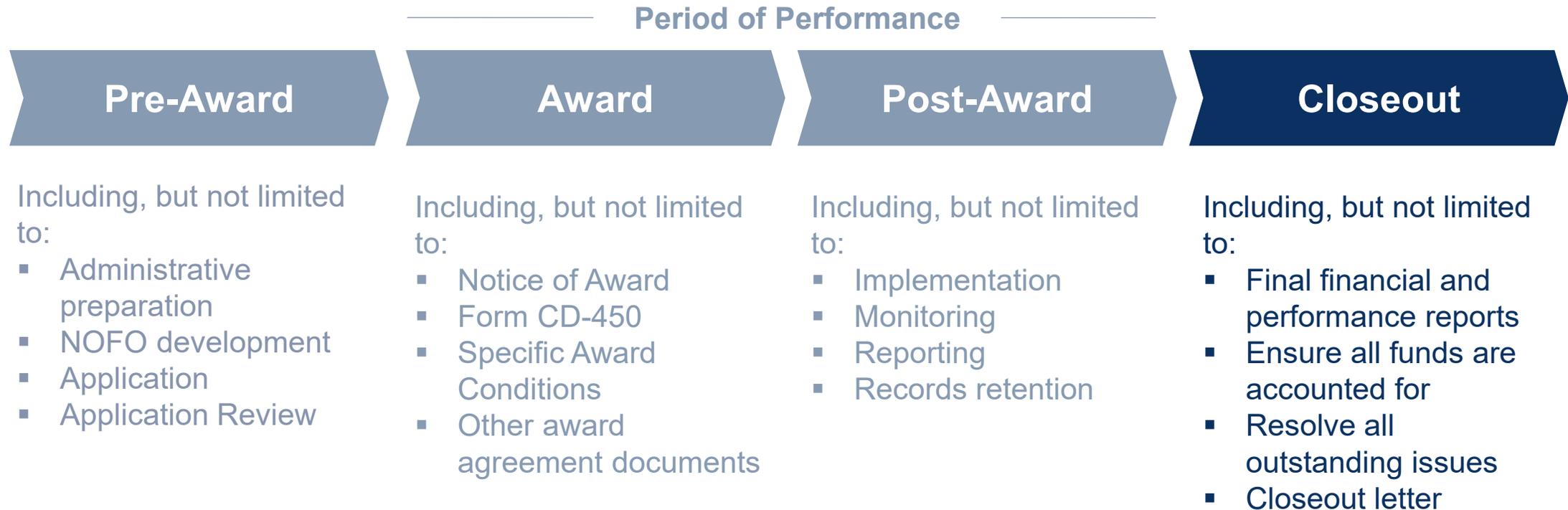


Closeout Phase

Closeout Phase

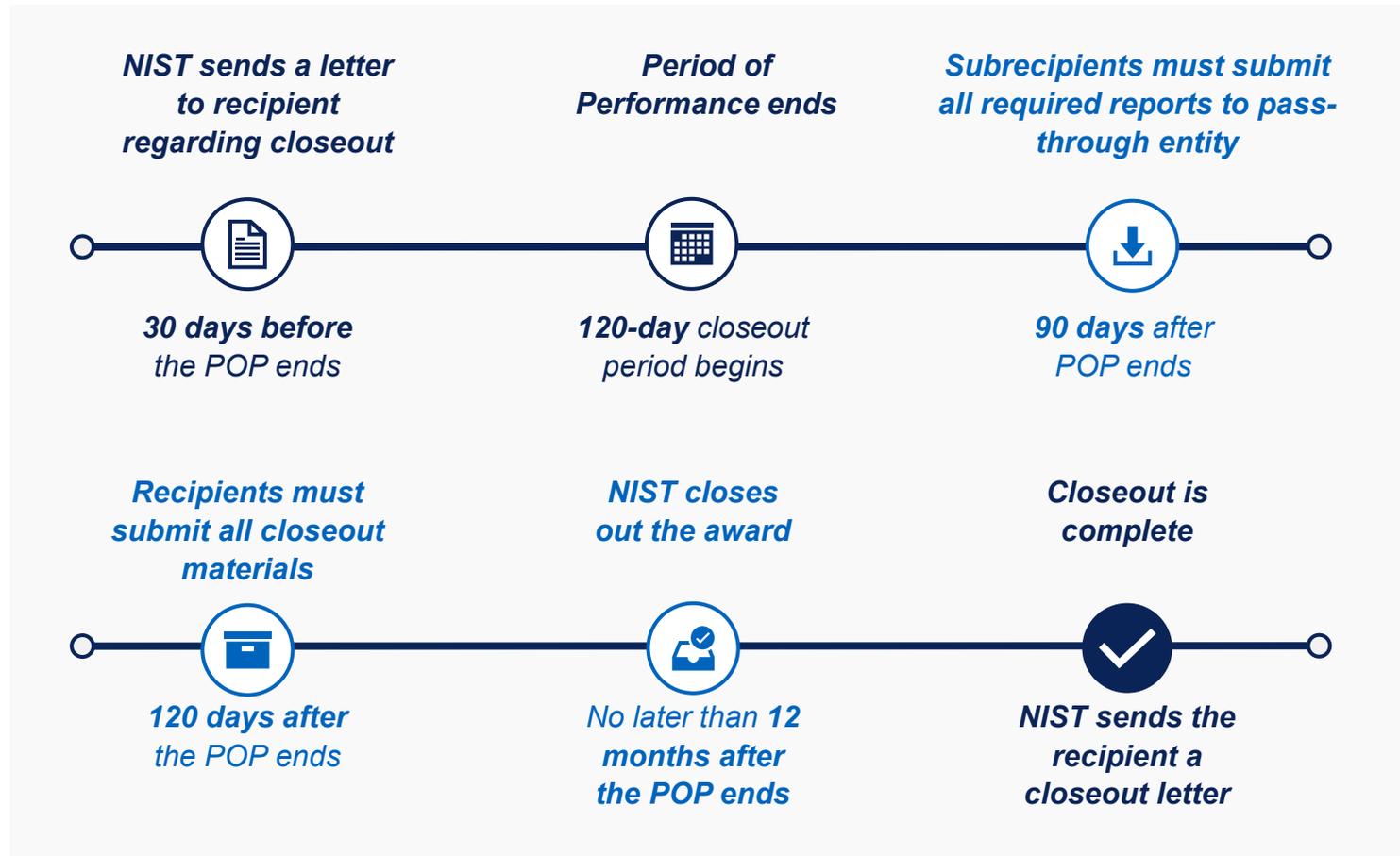


The Closeout phase is the final phase in the grant lifecycle, where the Recipient completes all necessary tasks to officially close the grant project.



Closeout Timeline

Recipients must meet all closeout requirements within a 120-day closeout period.



The closeout window is 120 days after the period of performance end date.

- Preparation for closeout
- Closeout process
- Closeout completion

Grant Program Closeout Requirements



Recipients must complete all programmatic, financial, and administrative requirements under 2 CFR § 200.344 and those included in program NOFO.



PROGRAMMATIC

- Complete monitoring requirements, including resolution of all corrective actions, if applicable
- Submit Final Report to cover the last reporting cycle
- Submit subrecipient closeout reports, if applicable
- Human Subject Research paperwork, if applicable



FINANCIAL

- Submit all Financial Reports
- Refund any unobligated cash balances
- Liquidate all financial obligations.



ADMINISTRATIVE

- Submit all Property Reports
- Account for all real and personal property
- Records Retention



Additional Resources

Guidance, Resources, and Assistance



NTIA will provide guidance, resources, and assistance to applicants regarding the Competitive Grant Program on the [BroadbandUSA website](#). Applicants should take advantage of these resources and assistance opportunities.



Notice of Funding Opportunity (NOFO)
Reference Document
Description of the specific program and all of its requirements



Program Overview
Webinar
Provides an overview of the application requirements and discusses the NOFO requirements



Application Guidance
Guidance
Provides guidance on how to fill out an application to a specific program, including screenshots and step-by-step instructions



Frequently Asked Questions (FAQs)
Reference Document
Collection of Frequently Asked Questions that provide insight and additional context into the program



Application Checklist
Guidance
Provide a checklist on all of the application requirements to complete an application



Additional Resources



- Department of Commerce Office of Acquisition Management’s [Financial Assistance Policy](#) – Provides financial assistance regulations, policies, and guidance that shape the financial assistance environment within the DOC, including:
 - **Department of Commerce Financial Assistance Standard Terms and Conditions:** This document sets out the standard terms and conditions applicable to DOC financial assistance awards.
 - **Department of Commerce Grants and Cooperative Agreements Manual:** This document sets forth DOC guidance on federal award administration and provides DOC with a uniform set of minimum procedures to govern the award lifecycle.
- [Digital Equity Act at a Glance](#) - Provides certain key information on the Digital Equity Act of 2021
- [Digital Equity Act Programs](#) - Provides an overview of the Digital Equity Act Programs and specific information for the Competitive Grant Program
- [Digital Equity Competitive Grant Program Get Ready One-Pager](#)– Provides basic information and tips for applicants to get ready for the Competitive Grant Program
- NTIA’s [System for Award Management Guidance for Bipartisan Infrastructure Law Program Applicants](#) - Provides guidance on how to access, register, and complete required documentation in SAM.gov
- [Title 2 of the Code of Federal Regulations Part 200 \(2 CFR Part 200\)](#) - Contains the regulations on awarding and administering federal grant funds. On April 22, 2024, OMB published updates to 2 CFR 200 in the [Federal Register at 89 FR 30046](#). These updates will apply to all awards issued under the DE Competitive Grant Program. An unofficial redline of these updates was published by the Chief Financial Officers Council, and is available on the [CFO.gov website](#).



Acronyms and Key Terms



Acronyms

- **AOR** - Authorized Organization Representative
- **ASAP** - Automated Standard Application for Payments
- **BEAD** - Broadband Equity, Access, and Deployment Program
- **FFR** - Federal Financial Report
- **FPO** - Federal Program Officer
- **GO** – Grants Officer
- **GS** – Grants Specialist
- **NGP** – NTIA Grants Portal
- **NOFO** – Notice of Funding Opportunity
- **PI/PD** – Principal Investigator/Project Director
- **PPR** - Performance Progress Report
- **RAR** - Recipient Authorized Representative
- **UGA** – Unfunded Grant Action

Key Terms

- **Auditing:** Ensuring compliance with government regulations and evaluating financial information, including expenses paid for with Federal award funds.
- **Monitoring:** Ensuring compliance with Federal regulations and grant terms to avoid and correct any potential issues.
- **No-Cost Extensions:** Extend the project period without adding additional funding.
- **Supplanting:** Using grant funds for project costs that are otherwise covered by other Federal or state funding.
- **Supplementing:** Using Federal funds to enhance existing state and local funds for program activities.



Questions
