



Bi-annual Performance Reports – Updates and Related Information



Overview of today's presentation

- 1. Executive Order (EO) resulting in minor changes to reports**
- 2. Reports will be made public – be mindful of including any BII or PII**
- 3. Project accomplishments**
- 4. Calculating the Overall percentage of completion**
- 5. Cost per mile calculation**
- 6. Anchor Institutions**
- 7. Wholesale/Last-mile information**
- 8. Davis-Bacon wage requirements of the Middle-mile Program**
- 9. Curing of SF-425/Federal Financial Report (FFR)**

Executive Order (EO) 14168 results in minor changes to reports

- EO 14168 titled, “**Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government**“ was signed by the President on January 20, 2025
- The EO states that, “It is the policy of the United States to recognize two sexes, male and female”.
- EO impacts to MM bi-annual, performance reports:
 - All references to “gender” have been removed from the performance report and replaced with “sex”.
 - Grantees will no longer report on workforce data element associated with “gender X” as this section has been removed from the report.
- Grantees are expected to provide statistics for sex, race, ethnicity, etc.

Bi-annual reports will be publicly available on NTIA's website

- To achieve a greater level of transparency, all MM bi-annual reports will be publicly available on NTIA's website.
- Such transparency is consistent with other broadband, infrastructure program at NTIA.
- Since the bi-annual reports will be publicly available, the MM Program Office has the following recommendations:
 - Grantees should be mindful not to include any Business Identifiable Information (BII)
 - Grantees should be mindful not to include any Personal Identifiable Information (PII)
- MM grantees will not be afforded the opportunity to redact information from the bi-annual performance report

Project Accomplishments Narrative

From the MM reporting guidance document:

- “Please use this section to detail the key accomplishments...experienced during this reporting period (e.g., permitting, procurement, construction, workforce development, etc.).”
- This narrative serves as the opportunity to promote the key accomplishments of your project. **Robust narratives are encouraged!**
- The key accomplishments narrative provides grantees with the opportunity to further justify the overall percentage of completion to date, if necessary.

Calculating the Overall percentage of completion

- The percentage of completion should be based **primarily on the expenditure** of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period.
- The calculation is consistent with other broadband, infrastructure programs at NTIA.
- While NTIA recognizes the fact that project spending may be a lagging indicator, the MM Program Office highly encourages grantees to use this methodology to calculate the overall percentage of completion.
- The MM Program Office strives for an objective and consistent measurement of the overall percentage of completion across the MM portfolio.
- Include information in the project accomplishments narrative to further support the overall percentage of completion to date.

Cost per mile calculation – fiber deployment

- Per the MM reporting guidance, cost per mile for fiber deployment should be calculated using the following inputs:
 - The total costs of labor
 - The total costs of materials
- The calculation is the same regardless of the type of fiber deployment (aerial vs. buried)

Anchor Institutions

From the MM NOFO - "Each applicant seeking an award to build middle mile infrastructure using fiber-optic technology shall certify that the proposed project, upon completion, will include direct interconnection facilities that will facilitate the provision of broadband service, at speeds not less than 1 Gigabit per second for downloads and 1 Gigabit per second for uploads to anchor institutions located within 1,000 feet of the middle mile infrastructure."

- Since all MM grantees made the certification in their application materials, NTIA expects each grantee to report complete and accurate information in this section of the report.
- Unlike other broadband infrastructure programs at NTIA, the costs for new last-mile services to an anchor institution is not allowable per the MM NOFO.
- Stats reported in 15a-1 and 15a-2 should be the same number.

Wholesale and Last-Mile providers

- **All figures in this section of the report are to be reported as cumulative numbers, per the reporting guidance**
- **Total number** is a statistic of the number of wholesale/last-mile providers benefitting from the newly deployed infrastructure
- **New access** is a statistics of wholesale/last-mile providers with recent access to qualifying, broadband services
- **Improved access** is a statistic of wholesale/last-mile providers with access to higher bandwidth, broadband services
- **Offering qualified broadband services** is a statistic of wholesale/last-mile providers services at a different ranges

Davis-Bacon Wages

- While Davis-Bacon wages are not a specific requirement of the MM program, the payment of such wages are encouraged.
- If a grantee stated in its application that it will commit to paying Davis-Bacon wages, NTIA fully expects a grantee to pay Davis-Bacon wages to laborers and mechanics working directly on the project implementation.
- Per the MM NOFO, if a grantee has not committed to paying Davis-Bacon wages in its application, an awardee must provide a project employment and local impact report detailing with its bi-annual report:
 - i. The number of contractors and sub-contractors working on the Project;
 - ii. The number of workers on the Project hired directly and hired through a third party;
 - iii. The wages and benefits of workers on the Project by classification; and
 - iv. Whether those wages are at rates less than those prevailing.

Davis-Bacon Wages - continued

- Additional information on Davis-Bacon from the MM FAQs:

2.19. Is there a Davis-Bacon requirement for Middle Mile? How do I know if I'm subject to reporting Davis-Bacon compliance?

No. While not required, Middle Mile Grant Program recipients are suggested to comply with the Davis-Bacon Act of 1931 for any projects over \$5,000,000. Recipients may provide a certification that they are compliant with the Davis-Bacon Act. If such certification is not provided, an awardee must provide a project employment and local impact report detailing the items listed in Section VI.E.1.7 of the NOFO. Additional information on how to remain compliant with the Davis-Bacon Act of 1931 can be found on the United States Department of Labor website and wage determinations can be found on the SAM.gov website at <https://sam.gov/content/wage-determinations>.

Curing of SF-425/Federal Financial Report (FFR)

- As part of the bi-annual reporting requirements, grantees are required to submit a completed SF-425 or Federal Financial Report (FFR) into the NTIA Grants Portal (NGP)
- The NGP forwards the SF-425 to the assigned NIST Grants Specialist for review.
- If necessary, a curing communication will be sent via email from the assigned NIST Grants Specialist.
- **Revised SF-425s should not be uploaded into the NGP.** Rather, it should be emailed to the NIST Grants Specialists and the NTIA Federal Program Officer (FPO).



Middle-Mile Bi-Annual Performance Reporting Q & A