



Scope Change and Budget Modification Primer

This document is intended solely to assist recipients in better understanding the Broadband Equity, Access, and Deployment (BEAD) Program and the requirements set forth in the Infrastructure Investment and Jobs Act and [Notice of Funding Opportunity \(NOFO\)](#), as modified by the [BEAD Restructuring Policy Notice \(RPN\)](#). 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 (as modified by the RPN). In all cases, statutory and regulatory mandates, the terms and conditions of the award, and follow-on policies and guidance shall prevail over any inconsistencies contained in this document.



Scope Change and Budget Modification Overview

NTIA anticipates that Eligible Entities will request scope and budget changes for BEAD projects after Final Proposal approval. See the [Scope Change and Budget Modification Guidance](#) for more information. Eligible Entities must not rely on the information in this primer alone.

PROJECT CHANGES THAT DO NOT REQUIRE A SCOPE CHANGE REQUEST

Eligible Entities must refer to the Deployment Scope Changes SAC and the terms of 2 CFR 200.308 to understand which revisions they may undertake themselves, and which require the prior approval of NTIA and/or NIST. Consistent with the terms of the Deployment Scope Changes SAC, Eligible Entities have **direct approval authority** to:



Extend subgrant project periods of performance for up to one year at no additional cost

Add No BEAD Locations under Reason Code 1 (No Broadband Connection), Reason Code 2 (No Demand for Mass Market Service), and Reason Code 3 (Removal from FCC’s Fabric)

Designate additional No BEAD Locations under Reason Codes 4-7 if the change does not result in removal of over 20% of Broadband Serviceable Locations (BSLs) or 200 BSLs from a single project (*whichever number is smaller*)

Eligible Entities will report the changes listed above in the **Semi-Annual (Technical) Report (SAR)**.

WHAT PROJECT CHANGES REQUIRE A SCOPE CHANGE REQUEST?

For changes outside those listed above, NTIA developed thresholds that, when met, require a scope change request that must be approved by NTIA (and possibly NIST) before an Eligible Entity may execute the change.

Change Type	Examples of Changes	Threshold for Triggering a Change Request
Subgrantee Change and/or Project Termination	<ul style="list-style-type: none"> Subgrantee Default¹ Consortium Split New Subgrantee 	<ul style="list-style-type: none"> Any change to subgrantees* requires NTIA and NIST review and approval <p><i>* The same subgrantee under a new name would not require a change request; this update would be submitted to NTIA via the SAR.</i></p>
Technology Changes	Proposed change to the technology type to serve a BEAD-funded project	<ul style="list-style-type: none"> Any change (even partial) in technology type for any BEAD-funded project in an approved Final Proposal requires NTIA approval
New No BEAD Locations	Application of Reason Codes 4-7 post Final Proposal approval	<ul style="list-style-type: none"> Changes that result in removing 200 BSLs or more than 20% of BSLs (whichever number is smaller) from a single BEAD project require NTIA approval
Budget Modification	Proposed change to an Eligible Entity’s approved BEAD budget (including any changes to the match)	<ul style="list-style-type: none"> Changes that alter more than 10% of total approved grant award (across cost categories) Note: Any change less than 10% is considered a budget change and does not require NTIA and/or NIST approval to implement. Movement of any amount of funds to an approved cost category that does not currently have funds Movement of any amount of funds to an indirect cost category Movement of restricted funds in the “Other” cost category that were not included in the Final Proposal Change in match, also known as cost share, included in a deployment project’s budget

¹ In the event of a subgrantee default, the Eligible Entity will be required to select a new subgrantee, and NTIA and/or NIST will review the outcome.

Scope Change & Budget Mod. Submission Components

Each Eligible Entity must submit Data, Budget, and Programmatic Attachments when completing a change request.

WHICH DATA REQUIREMENTS AND ATTACHMENTS ARE REQUIRED?

The Eligible Entity must resubmit the data files submitted as part of its Final Proposal (including files that did not require updating), its updated Final Proposal Funding Request (if applicable), and the required Narrative Summary questions aligned to the scope change type being requested.

Data Attachments

Eligible Entities will **upload the following CSV files**, using the template provided, to the NTIA Scope Change and/or Budget Modification intake module.

- **Subgrantees** (fp_subgrantees.csv)
- **Deployment Projects** (fp_deployment_projects.csv)
- **Locations** (fp_locations.csv)
- **No BEAD Locations** (fp_no_BEAD_locations.csv)
- **CAIs** (fp_cai.csv) (if applicable)

Proposed changes should be reflected in the relevant data file before submission.

NTIA will reject change requests if the Eligible Entity does not use the templates provided, makes modifications to formulas, fails to fully complete all required fields, or changes the columns.

All Final Proposal CSVs must be resubmitted even if they are not impacted by the change request being submitted. See page 4-5 for each change scenario's potential impact to the CSV files.

Programmatic Attachments

The Eligible Entity must also provide:

- **Narrative Summary:** populate the text fields found in the NTIA Scope Change and/or Budget Modification intake module
 - **Subgrantee Change and/or Project Termination:** narrative description of why the proposed change is needed and how the Eligible Entity selected its new provisional subgrantee(s)
 - **Technology Changes:** narrative explaining why the proposed change is needed and its alignment with the BEAD NOFO (as modified by the RPN)
 - **New No BEAD Location:** narrative on why the proposed change is needed and how the Eligible Entity applied the relevant reason code (4-7)
- **Supporting Documentation (optional):** any additional documentation that supports the scope change request

Budget Attachments

The Eligible Entity must submit the following attachments:

- **Revised Consolidated Budget Form**
- **Revised Project Narrative**

Change Request Scenarios and Actions

The following scenarios are examples intended to familiarize Eligible Entities with some common changes that may be needed.

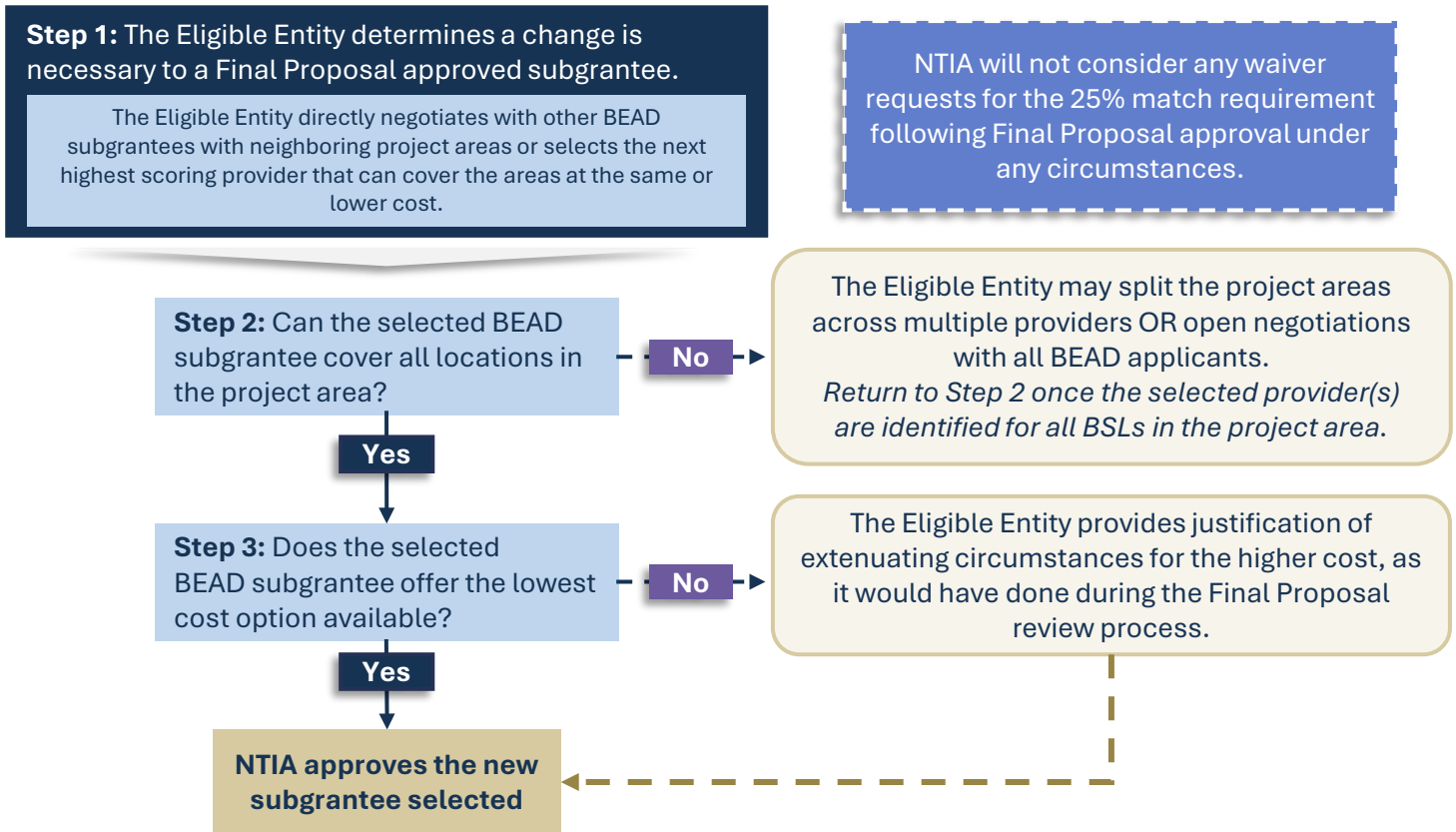
SCENARIO 1: SUBGRANTEE CHANGE AND/OR PROJECT TERMINATION

A provisional subgrantee does not sign the subgrantee agreement and the accompanying certification

Eligible Entity Actions

If there is a “Subgrantee Change and/or Project Termination” change type, the Eligible Entity must follow the process outlined below to **secure an alternative subgrantee to serve the locations covered by the award**. Once provisionally selected, the Eligible Entity must submit a scope change request to NTIA that describes how the new subgrantee was chosen in compliance with the process detailed below.

PROCESS TO SELECT A NEW BEAD SUBGRANTEE



Potential Impact to Budget

A subgrantee change or project termination will likely result in a budget change (under the assumption that the new subgrantee will not be serving the BSLs at the same cost as the previous subgrantee).

Potential Impact to Data

- Added row(s) to the **Subgrantees CSV** with the required information for the new provisionally selected subgrantees
- Updated fields in the **Deployment Projects CSV** to capture the new subaward dates, match information, etc.
- Updated fields in the **Locations** and **CAIs CSV** (if applicable) to capture the latest service information (speeds, latency, etc.)
- Add entries in the **No BEAD Locations CSV** if no subgrantee can be found or NTIA rejects the costs as excessive for impacted BSLs

Change Request Scenarios and Actions cont.

The following scenarios describe other common change requests that may face Eligible Entities.

SCENARIO 2: TECHNOLOGY CHANGE

A subgrantee needs to change the technology due to a network design change

Eligible Entity Actions

The Eligible Entity must ensure the new proposed technology meets the minimum speed, latency, and availability requirements found in the BEAD NOFO, as modified by the Restructuring Policy Notice. The Eligible Entity will submit a scope change request to NTIA and/or NIST for approval.

Potential Impact to Budget

In the event there is a technology change at a project level, a change in budget will occur unless the new project cost is identical to that of the original.

Potential Impact to Data

- Updated fields in the **Locations and CAIs CSV** (if applicable) to reflect a change in technology, speed, and latency
- Updated fields in the **No BEAD Locations CSV** if the change in technology is not applied to all locations and there is no technology planned for locations

SCENARIO 3: NEW NO BEAD LOCATION

The original subgrantee defaults, but the proposed cost to deliver service to the project area(s) is deemed too costly and NTIA denies the Eligible Entity's extraordinary circumstances request

Eligible Entity Actions

The Eligible Entity must collect and maintain evidence for not serving locations that meet the evidence objectives listed on page 47 of the Final Proposal Guidance for Eligible Entities. The Eligible Entity must submit a subsequent scope change request to apply Reason Code 7x to the locations for which NTIA denied the extraordinary circumstances justification.

Potential Impact to Budget

Funds allocated to this project(s) may decrease with the now lower number of total BEAD-eligible locations being served.

Potential Impact to Data

- Removal of project from **Deployment Projects CSV**
- Removal of location(s) and CAI (if applicable) from the **Locations and CAIs CSV**
- Addition of location(s) to the **No BEAD Locations CSV**

SCENARIO 4: BUDGET MODIFICATION

Eligible Entity needs a new permitting contractor or more funding from their original permitting amount or the subgrantee requests additional funds for procurement due to supply chain issues

Eligible Entity Actions

If this change directly modifies or contributes to a summed modification in the Eligible Entity's budget by 10% or greater, then the Eligible Entity will be required to submit a Revised Consolidated Budget Form and a Revised Project Narrative for approval to the Grants Office.

Potential Impact to Budget

Funds allocated to this project(s) may increase. Other changes such as location additions also affect the Eligible Entity's budget.

Change Request Submission Process

The Eligible Entity should follow the process outlined below to submit a scope change and/or budget modification request to NTIA and/or NIST for approval.



1. Eligible Entity informs Federal Program Officer (FPO)

Once an Eligible Entity becomes aware that a scope change and/or budget modification may be needed, it should promptly inform its FPO.

2. FPO designates change type(s)

If more than one change type applies (e.g., project termination resulting in a new technology type to serve BSLs), the Eligible Entity must coordinate with its FPO who will determine the type of change request needed.

The Eligible Entity must ensure all scope changes comply with the terms of 2 CFR 200.308, the [BEAD Program General Terms and Conditions](#), and all project-specific requirements, including but not limited to the National Environmental Policy Act (NEPA) and Permitting.

3. NTIA Grants Portal (NGP) module becomes available for the Eligible Entity

The Scope Change and/or Budget Modification module within NGP will become available for the Eligible Entity to begin its change request submission.

4. Eligible Entity utilizes the NGP to submit request(s)

The Eligible Entity must resubmit all CSV files approved as part of the Final Proposal, supporting budget documentation, and narrative responses to explain the requested change.

Additional details on accessing and navigating the NGP are forthcoming.

5. NTIA and/or NIST initiates change request review and curing

NTIA and/or NIST may contact the Eligible Entity via email and identify any issue(s) found within the change request submission and a timeline for issue(s) resolution by the Eligible Entity. The Eligible Entity should aim to resolve the issue(s) identified immediately to avoid delay. Once NTIA completes the review process, the change request will be forwarded to NIST (as applicable).

If the Eligible Entity wishes to modify its change request after submission (other than changes resulting from curing), then the Eligible Entity will need to communicate the proposed modifications to its FPO. In some cases, the FPO may request the Eligible Entity restart the change request submission in NGP.

6. NTIA and/or NIST approves the change request package(s)

Once NTIA and/or NIST approves the package(s), they will issue a Notice of Award (NOA) amendment or an administrative letter to the Eligible Entity noting the request has been approved. Upon receiving the NOA or administrative letter, the Eligible Entity may begin to implement the approved changes.

6. NTIA and/or NIST fully or partially denies the change request package(s)

If a change request is denied, the Eligible Entity will be notified by either NTIA or NIST, depending on the review stage, with details on the reason(s) for denial. The Eligible Entity is encouraged to communicate with its FPO for a successful resubmission.



Initiate a new change request using the guidance provided.