New Jersey

Office of Broadband Connectivity

Broadband Equity, Access, and Deployment
Program
NJ BEAD

Frequently Asked Questions

and Answers (FAQs)

Note

As of 6/13/2025 – OBC is adjusting program requirements and deadlines to maintain compliance with NTIA's Restructured Policy Notice which was published on June 6th, 2025. The FAQs below are current as of June 5th, 2025, before the Policy Notice was released. OBC will make any necessary changes to the FAQs in the coming weeks. Please refer to the OBC's website for the latest information.

During this review, applicants should not submit NJ BEAD applications. Despite the pause on submitting NJ BEAD applications, interested parties can still submit materials for prequalification. Prequalification is open and will be extended until at least June 23, 2025.

The Broadband Equity, Access, and Deployment (BEAD) program, administered by the National Telecommunications and Information Administration (NTIA) under the U.S. Department of Commerce, is a key initiative funded through the Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60102, Public Law 117-58, 135 Stat. 429 (November 15, 2021) also known as the Bipartisan Infrastructure Law. With an allocation of $42.45 billion, the BEAD program aims to deploy high-speed internet infrastructure to unserved and underserved locations across the United States.

In New Jersey, the BEAD-funded initiative is known as the New Jersey Broadband Equity, Access, and Deployment (NJ BEAD) program. Managed by the Office of Broadband Connectivity (OBC) within the New Jersey Board of Public Utilities (BPU), NJ BEAD aims to provide a reliable, high-bandwidth internet service of at least 100/20 Mbps to every serviceable location in New Jersey. New Jersey has received $263,689,548.65 in BEAD funding to advance this goal.

NJ BEAD will run a competitive subgrant process to fund deployment initiatives including broadband infrastructure projects, prioritizing broadband services for unserved and underserved locations, including Community Anchor Institutions (CAIs).

This FAQ document offers general information and guidance about the deployment initiatives of the NJ BEAD program. It is not intended to serve as a comprehensive legal interpretation of the program's rules and regulations, nor does it supersede, modify, or otherwise alter applicable statutory or regulatory requirements or the specific application requirements set by the OBC or the NTIA. Statutory and regulatory mandates, as well as the requirements detailed in New Jersey's Notice of Fund Availability (NOFA) and NTIA-approved Initial Proposal Volume 2, will take precedence over any inconsistencies in the FAQs.

This FAQ document will be updated regularly with new questions and answers as they are received. Please check frequently for the latest information on the BEAD website: https://www.nj.gov/connect/grants/bead/resources/index.shtml.

For further information or clarification, please contact the Office of Broadband Connectivity at broadband@bpu.nj.gov. **Please make sure to include "BEAD" in the subject line.**

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1. General

1.1 What is considered a serviceable location, unserved location, and underserved location under the NJ BEAD program?

As described in the federal BEAD NOFO (Section 1.C):

- **A serviceable location** or **broadband serviceable location** (BSL) is defined as a business or residential location in the United States at which fixed broadband Internet access service is, or can be, installed.
- **An unserved location** is defined as a broadband-serviceable location that does not have access to broadband service, or lacking access to Reliable Broadband Service offered with—(i) a speed of not less than 25 Mbps for downloads; and (ii) a speed of not less than 3 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.
- **An underserved location** is defined as a broadband-serviceable location that is (a) not an unserved location, and (b) that the Broadband DATA Maps show as lacking access to Reliable Broadband Service offered with—(i) a speed of not less than 100 Mbps for downloads; and (ii) a speed of not less than 20 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.

As emphasized in the NTIA-approved Initial Proposal Volume 2 (Section 2.4.1), BEAD recipients are required to serve all unserved and underserved BSLs (Broadband Serviceable Locations), as well as all CAIs (including, if requested, wiring or special construction required to connect a CAI within 10 business days from its request), within all PABBs included in their proposed project areas.

1.2 What is NTIA's definition of reliable broadband service?

As referenced in the federal BEAD NOFO (Section 1.C), the NTIA defines "reliable broadband service" as broadband service that meets performance criteria for service availability, adaptability to changing end-user requirements, and length of serviceable life. Specifically, it includes broadband service provided via fiber-optic technology, cable modem/hybrid fiber-coaxial technology, digital subscriber line (DSL) technology, or terrestrial fixed wireless technology utilizing entirely licensed spectrum or a hybrid of licensed and unlicensed spectrum.

1.3 Will OBC publish official guidance for the prequalification phase and the subgrantee selection process?

The NJ BEAD NOFA will be posted on the OBC website and the NJ Register. OBC will post additional guidance on the reference prices for minimization of BEAD outlay and affordability, updated unserved and underserved BSLs and CAIs lists, and guidance on NEPA, NHPA, and BABA on the OBC website. Applicants will also be given detailed guidance in the application forms on what is expected from them.

1.4   What is the difference between BEAD NOFO and BEAD NOFA? Where can I access them?

The BEAD NOFO refers to the federal BEAD Notice of Funding Opportunity issued by NTIA, which explains how states can receive broadband funding under the Infrastructure Investment and Jobs Act. The NJ BEAD NOFA refers to the New Jersey BEAD Notice of Funding Availability which explains how applicants in New Jersey can compete for and receive portions of the state's allocated BEAD funding. The federal BEAD NOFO can be found on the OBC website under the Federal Resources section of the [Resources for NJ BEAD Applicants](#) page. The NJ BEAD NOFA can be found on the OBC website under the Application Information section of the [Resources for NJ BEAD Applicants](#) page.

1.5   Any update on the Final Determination and where can we access it?

OBC has made the Final Determination of un/underserved BSLs eligible for NJ BEAD funding available under the Application Support Resources section of the [Resources for NJ BEAD Applicants](#) page on the OBC website.

1.6   Is submitting a prequalification application mandatory before submitting a NJ BEAD application?

Applicants may prepare and submit applications before receiving notification of the outcome of prequalification. OBC will review an applicant's application once it has successfully prequalified. OBC will notify applicants if it has any questions or requires any updates to applications.

1.7   How does OBC plan to address the anticipated updates in NTIA's forthcoming guidance and how can applicants stay informed?

Once NTIA publishes the Policy Notice, OBC will make any necessary adjustments to program requirements or deadlines to maintain compliance with NTIA guidance, as more information is received. Applicants should ensure they are aware of all the requirements of the program, including any requirements impacted by the updated guidance; this information will be posted on OBC's website within a brief timeframe of the state's review and posting.

1.8   Every state received notification that NTIA was terminating their programs funded under the Digital Equity Act. Does this action affect the NJ BEAD program?

No. BEAD, which allocates $42.5 billion for broadband infrastructure deployment, and the Digital Equity Act, which allocates $2.75 billion for digital skills and adoption, are separate NTIA-administered funding streams under the Bipartisan Infrastructure Law. Therefore, any changes to the Digital Equity Act programs do not affect BEAD. See OBC's plan to address NTIA's anticipated updates to the BEAD program in question 2.7 above.

1.9   Can you provide any update on non-deployment funding related to Digital Equity Act programs?

All planned efforts related to the Digital Equity Act will be on pause until further notice. See question 2.8 for further context.

1.10 Will there be a separate prequalification and application period for non-deployment activities?

Applicants may refer to the current version of the Initial Proposal Volume 2 Section 2.5.2 for more information on the activities related to non-deployment.

1.11 Does OBC plan to follow the prioritization and scoring process outlined in Initial Proposal Volume 2, Section 2.4.2? Are there any changes or clarifications applicants should be aware of?

Initial Proposal Volume 2, Section 2.4.2 currently provides OBC's prioritization and scoring process. The scoring process may change in the anticipated NTIA guidance. See also question 2.7.

1.12 Clarification on the formula for awarding points for Minimization of BEAD Outlay to applicants requesting more than the OBC-provided reference price

The revised formula for awarding points for Minimization of BEAD Outlay to applicants requesting more than the OBC-provided reference price is:

5*[1 - (percent of reference price requested – 100%)]

For example, an application requesting 140% of the reference price would receive a total of 5*(1-0.4) = 3 points.

1.13 How are changing technology preference changes affecting the NJ BEAD process?

NTIA has informed all states that it plans to adopt "a more technology-neutral approach" in its Notice of Programmatic Waiver published on April 22, 2025, prompting a 90-day extension to account for potential impacts on timelines. See OBC's plan to address NTIA's anticipated updates to the BEAD program in question 2.7 below.

1.14 Please confirm if the 25% match requirement for total project costs is mandatory and whether third party cost share is allowed.

Yes, the 25% match requirement is a mandatory BEAD requirement, and third party cost share is allowed (certain match source are unallowable, including other federal programs with these exceptions: The Families First Coronavirus Response Act of 2020; The Coronavirus Aid, Relief, and Economic Secure (CARES) Act of 2020; The Consolidated Appropriations Act, 2021; The American Rescue Plan Act of 2021). Applicant should provide detailed information in the "4. Subsidy request" sheet of the Application Intake Form.

1.15 What guidance and/or materials can applicants use to better understand the program?

Please refer to the Resources for NJ BEAD Applicants page on the OBC website for all guidance and materials, including but not limited to:

- Prequalification
  - Prequalification Intake Form
  - Prequalification Webinar: Recording/Presentation
  - Prequalification Webinar 2: Recording/Presentation
  - Office Hours: Recording
- Application
  - PABB Reference prices
  - Eligible BSLs and CAIs
  - Application Intake Form
  - Program Conditions Form
  - Application Instructions
  - Application Intake Form Walkthrough
  - Application Webinar: Recording Link | Webinar Deck
- General
  - NJ BEAD NOFA
  - NJ BEAD FAQs
  - e-Filing Walkthrough

2. Application Timeline

2.1   What is the application process and what are the key deadlines for the NJ BEAD program?

As outlined in the NTIA-approved Initial Proposal Volume 2 (Section 2.4.1), the competitive subgrant process begins with a pre-qualification phase where potential subgrantees must provide select BEAD-required financial, operational, managerial and technical qualifications as well as submit required certifications and authorizations and any other information required by OBC in the pre-qualification application form. Applicants that prequalify will be considered for an award. The prequalification phase opened on April 14, 2025, and will remain open until June 6, 2025.

OBC will regularly update this FAQ document and the NJ BEAD website with updates on the timing of the application phase.

2.2   How long will the BEAD application window be open?

The pre-qualification window will remain open until 5:00 PM ET on June 6, 2025. OBC is currently reviewing prequalification submissions on a rolling basis. OBC will notify applicants when their prequalification has been approved or if it requires more materials. NJ BEAD applications are due by 5:00 PM ET on June 19, 2025. Applicants may prepare and submit applications before receiving notification of the outcome of prequalification. OBC will review an applicant's application once it has successfully prequalified. OBC will notify applicants if it has any questions or requires any updates to applications.

2.3   What is the application timeline? Will OBC consider extending the BEAD deployment application deadline?

The Prequalification window is open until 5:00 PM ET on June 13, 2025. The Application window currently runs from May 27, 2025 until 5:00 PM ET on June 19, 2025. OBC will notify applicants if it extends this deadline.

2.4   Is submitting a prequalification application mandatory before submitting a NJ BEAD application?

No, but a prequalification application must still be submitted by 5:00 PM ET on June 13, 2025.

3. Eligible Applicants

3.1 What does "applicant" mean in the context of NJ BEAD?

In the NJ BEAD program, the term "applicant" refers to entities that are eligible to apply for grant funding to support broadband expansion projects. Consistent with federal guidance outlined in the federal BEAD NOFO (Section IV.C.1.a), applicants may include internet service providers (ISPs), local governments, cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, and public utility districts.

3.2 Is the NJ BEAD funding opportunity exclusively available for private sector providers?

No. Both the federal BEAD NOFO and New Jersey's NTIA-approved Initial Proposal Volume 2 emphasize that the following classes of potential providers—cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments—are eligible to participate in the subgrant competition for broadband deployment. Eligible entities can submit a proposal for last-mile broadband projects, provided they meet the financial, managerial, technical, and operational qualifications required. Those requirements are outlined in the federal BEAD NOFO (Section IV.D) and detailed in NTIA-approved Initial Proposal Volume 2 (Sections 2.4.11–2.4.15).

3.3 If a company does not have audited financials, are there any other options? For instance, CPA Reviewed? Or is this an instant disqualifier?

No, it is not an instant disqualifier. As outlined in the Initial Proposal Volume 2 (Section 2.4.11.c), all applicants are required to provide financial statements from the previous two fiscal years. These financial statements must show evidence of having been audited by an independent certified public accountant. Audits must also comply with the requirements set forth in the Initial Proposal Volume 2 (Section 2.4.11.c).

If the applicant has not been audited during the ordinary course of business, in lieu of submitting audited financial statements, it must submit unaudited financial statements from the prior fiscal year and certify that it will provide financial statements from the prior fiscal year that are audited by an independent certified public accountant by a deadline specified by OBC. OBC expects to require audited financial statements prior to approving any provisional grant awards.

3.4 **Would municipal operated or affiliated school districts qualify as local governments to be eligible to apply for NJ BEAD?**

Municipal operated or affiliated school districts should ensure they coordinate with their associated local governments so that the appropriate authorities can make certifications on behalf of the applicant.

3.5 **We are not currently a broadband provider or are still organizing our partnership model. Can we apply for NJ BEAD?**

OBC welcomes different types of providers, including for-profit providers, electric co-operatives, municipal providers, and public-private partnerships, provided that each applicant meets all financial, managerial, operational, and technical requirements.

4. Applications and Project Areas

4.1 How are project areas defined for the NJ BEAD program?

As outlined in NTIA-approved Initial Proposal Volume 2 (Section 2.4.1), potential subgrantees for NJ BEAD will design their overall project area proposals by combining a set of project area building blocks (PABBs). For the purposes of NJ BEAD, PABBs will correspond to Census Block Groups (CBGs). These PABBs will exclusively include unserved and underserved Broadband Serviceable Locations (BSLs) and Community Anchor Institutions (CAIs) within their boundaries. Importantly, no served locations will be included in these project areas. Applicants are required to serve all unserved and underserved BSLs and CAIs within the proposed area. Prior to the launch of the NJ BEAD application phase(s), OBC will publish a list of PABBs eligible for funding and their associated reference prices.

4.2 How do I obtain the list of un/underserved locations eligible for BEAD?

See question 2.5 above.

4.3 How should applicants include Census Block Groups (CBGs) with no BEAD-eligible Broadband Serviceable Locations (BSLs) but with Community Anchor Institutions (CAIs) in their proposed Project Area, given that Table 3.1 of the Application Intake Form only allows the selection of CBGs with BEAD-eligible BSLs?

If a CBG contains CAIs but cannot be selected in Table 3.1 of the Application Intake Form, it is because the CBG lacks BEAD-eligible BSLs. In this case, to include these CBGs in their application, applicants should:

1. Include all CAIs they propose to serve — whether located in CBGs listed in Table 3.1 or not — in the CAI shapefiles. Use the shapefile template provided in the "12. CAIs" tab of the Application Intake Form. Ensure the shapefiles include the required columns with correct field names.

2. Leave comments in the "comment" column of the CAI shapefiles for CAIs located outside the CBGs selected in Table 3.1.

3. Use the following format for comments:
   "In addition to CBGs listed in the Application Intake Form; [Separable, BEAD subsidy request: $X / Non-separable]"
   Here, "$X" represents the BEAD subsidy request for serving the CAI with 1 Gbps symmetrical service, including any required wiring or special construction to connect the CAI within 10 business days of its request.

The Office of Broadband Connectivity (OBC) will consider CBGs containing the CAIs included in the CAI shapefiles as part of the proposed Project Area, along with the CBGs listed in Table 3.1.

If the proposed Project Area consists solely of CBGs with no BEAD-eligible BSLs (i.e., CAI-only projects), applicants may find that Table 3.1 remains empty. As a result, certain cells in Tables 4.3 and 9.2 may display warning messages such as "No Project Area specified, please revise inputs in Project Area sheet." In such cases, applicants may proceed with completing their Application Intake Form for submission, as OBC will consider CBGs containing the CAIs included in their CAI shapefiles as their proposed Project Area.

4.4   Which publication date of the CostQuest data will be used for eligible BSLs for NJ BEAD?

The FCC Broadband Serviceable Location Fabric version 4 (as of 12/31/2023), with applicable updates from version 6 (as of 12/31/2024).

4.5   Can an applicant submit multiple applications?

Yes, applicants may submit multiple applications, and in doing so must be prepared to accept any application OBC provisionally awards (i.e., applicants may not withdraw applicants once fully submitted to OBC). Individual Project Area Building Blocks (PABBs) can be included in up to two applications. Applicants must submit a separate application intake form for each application.

4.6   If an applicant missed the Phase 1 application window, can they submit during Phase 2?

No, all applicants of any technology type must apply in Round 1 in order to receive an award. (See New Jersey's currently approved Initial Proposal Volume 2)

4.7   If I apply, can I withdraw my application after Phase 1?

Providers that applied to Phase 1 and did not receive an award in Phase 1 may not withdraw.

4.8   Are locations that will be built out using NJBIDE dollars included in the list of eligible BEAD locations?

No. Locations that are anticipated to be awarded through NJBIDE are not eligible for funding through NJ BEAD at this time and are not included in the published list of eligible BEAD locations posted on the OBC website.

4.9 **How should eligible locations be treated if they can already be reliably serviced with a high-speed connection? Should they be included in a project proposal or reported separately?**

The dataset posted on the OBC website includes Broadband Serviceable Locations (BSLs) with final classifications as unserved or underserved, as determined through the NTIA-approved challenge process. Applicants must agree to serve all unserved and underserved BSLs, as well as all CAIs, within all PABBs included in their proposed project area and include all respective BEAD-eligible BSLs in their shapefiles. If an applicant determines a location is already served, they may leave a comment in their shapefiles.

4.10 **How does an applicant find out how many locations are unserved/underserved in their municipality?**

Applicants can use the FCC Broadband Serviceable Location Fabric Version 6 (as of December 2024), along with the list of un/underserved BSLs eligible for NJ BEAD funding available under the Application Support Resources section of the Resources for NJ BEAD Applicants page on the OBC website to know how many un/underserved BSLs eligible for NJ BEAD funding are in their town.

4.11 **Are there any limitations on designing Project Areas as described in Initial Proposal Volume 2, Section 2.4.1? For example, can PABBs be non-contiguous, and is there a limit on the number of PABBs that can be combined into a single project area?**

Project Area Building Blocks (PABBs) can be non-contiguous and there is no limit on the number of PABBs that can be combined into a single project area. See also question 1.3

4.12 **How will letters of support be scored if the application instructions list them as optional?**

Applicants will be awarded 3 points for letter of support from one or more local governments within their proposed BEAD service area. This letter should:

- Acknowledge that the provider directly engaged with local government representatives to present and discuss their project proposal, and that their submitted application proposal acknowledges, and when possible, addresses, any major inputs and concerns from the local government.
- Include a statement indicating the local government's commitments to streamline permitting approvals and granting access to Right of Way.

See Initial Proposal Volume 2 Section 2.4.2 for more information about scoring for Local government support & community engagement.

4.13 A Program Condition requires applicants to modify Project Areas by adding up to 10% or removing up to 20% of unserved and underserved locations. In this case, will applicants be allowed to adjust their subsidy requests to reflect cost changes?

Reasonable adjustments will be allowed to subsidy requests, as determined by OBC, in the event it must remove up to 20% or add up to 10% to the size of final project awards under either of these provisions.

See Initial Proposal Volume 2 Section 2.4.6 to know about the deconfliction process.

5. Prequalification Intake Form

5.1 Is the preference to have the answers to questions in the Prequalification Intake Form or upload a separate .PDF?

Applicants should provide answers directly within the Prequalification Intake Form, following the instructions provided for each question. For questions requiring written responses, applicants should adhere to the specified word limits. For questions requiring documentation, applicants must upload the necessary files as instructed. Both the completed Prequalification Intake Form (as excel workbook) and the requested documentation (as PDFs) must be submitted as part of the prequalification process. Detailed instructions on how to submit these materials are available on the Resources for NJ BEAD Applicants on the OBC website.

5.2 How strict is the word limit for answers? One question allows a .PDF upload "If additional space is needed"

Applicants should follow the word limit. Applicants are also advised to prioritize brevity and relevance in their answers. This word limit is set to ensure concise, focused, and relevant responses while avoiding overly lengthy submissions. For questions that allow a .PDF upload if additional space is needed, it should only be used sparingly and for essential supplementary information.

5.3 Would one representative project be acceptable to demonstrate the applicant's technical experience in designing and delivering projects of similar size, complexity and timeline?

OBC cannot make that determination without reviewing the submission. Applicants are encouraged to apply and OBC will request additional information, if necessary, to make its determination of the applicant's technical experience in designing and delivering projects of similar size, complexity and timeline.

5.4 Can the certification evidencing consistent compliance with federal, state, and local laws in the last 5 years be submitted by an applicant executive that manages compliance or an officer that can bind the applicant?

For prequalification, an executive who manages compliance is sufficient. OBC may require further attestation from a Director-level/Officer who can bind the applicant before an award is made.

5.5 **Please confirm applicants do not need to submit anything if questions 32-35 do not apply.**

Yes, questions 32-35 are only to be answered if applicable to the specific applicant.

5.6 **Can annual 10-K filings with the SEC that include audited financials be submitted in response to question 38 that requires applicants to submit audited financial statements?**

Yes, annual 10-K filings with the SEC that include audited financials can be submitted in response to question 38.

5.7 **What is the scope of federal or state criminal proceedings or civil litigation as referred to in question 25 of the prequalification intake form?**

The scope is federal or state criminal proceedings or civil litigation for which you have been found liable and are related to broadband deployment or services.

5.8 **If an electric utility is applying but is not required to file forms that are required, such as RUS Form 7, RUS Form 12, CFC Form 7, CFC Form 12, CoBank Form 7, or their functional replacements, how should it proceed?**

An applicant that has "operated only an electric transmission or distribution service … must submit qualified operating or financial reports that it has filed with the relevant financial institution for the relevant time period…" [1]. Applicants that do not have the forms listed may also submit "the functional replacement of one of these reports." Applicants must choose either option to show they possess the operational capability to prequalify.

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[1] NTIA BEAD Notice of Funding Opportunity (NOFO) Section IV.D.2.e (Pg. 75)

6. Compliance

6.1 How do I get access to the FCC's broadband data?

See question 2.5 above.

6.2 How should an applicant ensure compliance with the NJ BEAD program's cybersecurity and supply chain risk management requirements?

As detailed in the NTIA-approved Initial Proposal Volume 2 (Section 2.16.4), prospective NJ BEAD subgrantees must have a cybersecurity risk management plan that is either already operational (if they currently provide service) or ready to be implemented once service begins. This plan must be periodically updated as needed, and submitted to the OBC before any funds are allocated. Any substantive changes must be reported within 30 days of revision.

Similarly, applicants must also maintain a supply chain risk management plan, following the best practices outlined in NISTIR 8276 and NIST SP 800-161. This plan must be operational or ready for deployment and must detail the specific supply chain risk management controls in use. The plan must be submitted to the OBC before funding is awarded and updated regularly. The OBC certifies that it will enforce these requirements and, where a subgrantee relies on third-party infrastructure, will obtain equivalent attestations from those applicants to ensure compliance with both cybersecurity and supply chain protocols.

6.3 What are the reporting requirements for applicants to maintain compliance throughout the NJ BEAD program's period of performance?

As detailed in the NTIA-approved Initial Proposal Volume 2 (Section 2.16), applicants participating in the NJ BEAD program are required to comply with a comprehensive reporting framework throughout the project lifecycle. Subgrantees must submit quarterly progress reports detailing the status of broadband infrastructure deployment, including the list of service locations (with classification as residential, commercial, or community anchor institutions), types of facilities installed, advertised and actual speeds, service pricing, and interconnection agreements. These reports must also include data on contractor diversity, compliance with federal mapping standards, financial reports (e.g., SF-425), and labor compliance certifications or workforce impact reports for projects exceeding $5 million. Additional required information includes ACP (Affordable Connectivity Program) enrollment figures, local hiring data, status of apprenticeship programs, and a description of permits and milestones. Subgrantees must also submit a final report within 90 days of project completion, summarizing infrastructure activities, service capabilities, affordability measures, and final financials.

To enforce compliance, as detailed in the NTIA-approved Initial Proposal Volume 2 (Section 2.16.2), OBC will employ a milestone-based reimbursement system and retain the final 10% of grant funds until all project obligations are met and verified. OBC conducts risk assessments of all subgrantees to tailor the depth of monitoring and will implement claw back provisions for failure to meet deployment, service, or reporting requirements. Ongoing monitoring may include site visits, invoice and desk reviews, internal compliance checks, and communication logs. Subgrantees that underperform may be placed on a Performance Improvement Plan (PIP).