



**STATE OF HAWAI‘I  
BEAD FINAL  
PROPOSAL APPENDIX**

**APPROVED BY NTIA  
NOVEMBER 18, 2025**

**VERSION 2.0**

## Document Version History

Version	Date	Summary of Changes
1.0	8/27/2025	Initial release for public comment
1.1	9/4/2025	Draft for NTIA Submission. Incorporates public comments received.
2.0	11/18/2025	NTIA approval.

## Table of Contents

Appendix A - Glossary of Acronyms	3
Appendix B - Subgrantee Monitoring Plan	4
Appendix C - Reimbursement Policy Documentation	9
Appendix D - EHP Documentation	11

# Appendix A - Glossary of Acronyms

## Glossary of Acronyms

- **B&F:** Hawai'i Department of Budget & Finance
- **BEAD:** Broadband Equity Access and Deployment Program
- **BSL:** Broadband Serviceable Location (a location that can receive mass-market Internet)
- **CAI:** Community Anchor Institution (e.g., school, library, hospital)
- **CAF:** Connect America Fund II
- **CONUS:** Continental United States
- **CPF:** Coronavirus Capital Project Funds
- **DHHL:** Department of Hawaiian Home Lands
- **DOT:** Hawai'i Department of Transportation
- **DSL:** Digital Subscriber Line (copper wiring)
- **EHP:** Environment and Historic Preservation
- **ESAPTT:** NTIA Environmental Screening and Permitting Tracking Tool
- **FCC:** Federal Communications Commission
- **HAR:** Hawai'i Administrative Rules
- **HPHA:** Hawai'i Public Housing Authority
- **IJJA:** Infrastructure Investment and Jobs Act
- **ISP:** Internet Service Providers
- **INET:** Institutional Network
- **IPV2:** Initial Proposal Volume 2
- **LEO:** Low-Earth Orbit Satellite
- **LFW:** Licensed Fixed Wireless
- **MDU:** Multi Dwelling Unit (condo, townhouse, apartment, etc.)
- **MMG:** Enabling Middle Mile Infrastructure Grant Program
- **NEPA:** National Environmental Policy Act
- **NOFO:** Notice of Funding Opportunity
- **NTIA:** National Telecommunications and Information Administration
- **PEIS:** FirstNet Regional Programmatic Environmental Impact Statement
- **RCUH:** Research Corporation of the University of Hawai'i
- **RDOF:** Rural Digital Opportunity Fund
- **RFP:** Request for Proposal
- **RPN:** BEAD Restructuring Policy Notice
- **TBCP:** Tribal Broadband Connectivity Program
- **UH:** University of Hawai'i
- **UHBO:** University of Hawai'i Broadband Office
- **ULFW:** Unlicensed Fixed Wireless

# Appendix B - Subgrantee Monitoring Plan

## Hawai'i BEAD Subgrantee Monitoring Plan

Hawai'i's subgrantee monitoring program plan is designed to effectively meet BEAD program objectives by minimizing risk, limiting potential waste, fraud, and abuse of federal funds, ensuring projects are completed on time, while also not overburdening subgrantees.

Hawai'i will use this subgrantee monitoring plan to actively monitor provisionally selected BEAD subgrantees to ensure compliance with the BEAD NOFO, BEAD Program General Terms and Conditions, any Specific Award Conditions (SACs) or award amendments, and applicable laws and regulations. This plan will apply to all project areas for the duration of the subgrantee's implementation timeline. This plan will be reevaluated and updated on a periodic basis and as events warrant.

Hawai'i's overall approach to subgrantee monitoring will involve the following components:

1. Subgrantee reporting
2. Site visits
3. Desk reviews
4. Risk assessment

### Subgrantee Reporting (Weekly, Monthly)

Initially, following a project kickoff meeting with the University of Hawai'i Broadband Office (UHBO), subgrantees will be required to provide weekly reports to UHBO detailing project status and issues. These project and expenditure reports will be required throughout the duration of the project's implementation. Timing can vary depending on the amount of work and pending milestones. These standing meetings are to ensure that UHBO can remain current on project progress and up to date on potential issues encountered by the subgrantees. Discussion may include key project issues, major project action items, progress since the prior meeting, and project scheduling.

Written project reports are due at each status meeting, with follow-ups at 7 or 14 days, depending on the nature of the discrepancy or issue. A sample meeting agenda is as follows:

Sample Agenda:

- Key Project Issues & Status
- Major Project Action Items
- Project Schedule
  - 1. Progress since last meeting
  - 2. Critical path analysis
  - 3. Project Issues or Concerns

- o 4. Constraints
- o 5. Delays and Pending Time Impact Analysis
- o 6. Documentation Changes
- o 7. Resource Changes
- Permitting
- Project Budget

For expenditures, quarterly reports detailing deployment progress and expenditures for reimbursement will be due within two weeks (14 calendar days) of the previous quarter. (Example: Q1 ends March 31, reports are due April 14). Reports must record all expenses made within the quarterly performance period, as well as running project costs since the initial awarding of funds. UHBO will provide templates to subgrantees to ensure uniformity of reporting. UHBO will also remind subgrantees of the expenditure reporting deadline. UHBO will work with NTIA to finalize the reporting requirements during the subgrantee monitoring phase to meet federal reporting requirements and minimize duplicative reporting by the subgrantee.

In order to secure project cost reimbursements, subgrantees must provide evidence that they have finished the required work. Reports must identify, location by location as required by NTIA, project status. UH should be able to ascertain through this report whether an individual location is in progress, completed, tested, or deployed but awaiting a customer to order service.

Following the subgrantee's completion of the project, subgrantees will be required to provide the following reports. Templates will also be provided:

- A close out report due within 60 days of the end of the project period. This report should confirm that all contractual obligations were met. This includes network capabilities meeting speed, latency, and network outages requirements, and availability of a low-cost plan.
- A post-closeout report due 6 months after the project closes out. This report should provide subscriber counts, subscriber satisfaction rating, and any issues reported by subscribers, how they were resolved, and outstanding issues identified that may not be service-related for BEAD-funded areas.

#### Site Visits (Periodic)

UHBO staff will be doing periodic site visits to ensure that locations are, in fact, connected. The main goals of UHBO monitoring and site visits are:

- To **accurately measure** download and upload speeds, along with latency (ping), at designated service locations.
- To **compare these measurements** against the speeds promised by the Internet service provider.
- To **identify potential problems** such as network congestion, signal interference, or outdated equipment.

- To **establish a baseline** for ongoing monitoring of internet performance.

The site visits are also necessary to document the construction and progression of BEAD projects. In the event of slower project progression, additional site visits may be required to assess the project closely and make a determination on whether funds may need to be recouped, should a subgrantee fail to fulfill contractual obligations on their proposed timeline to service. UHBO will work with the subgrantee to schedule site visits in advance, but may include ad-hoc visits.

#### Desk Reviews (Quarterly)

UHBO will conduct desk reviews of all BEAD deployment milestones each quarter to ensure:

- Deployment progress is made and reported
- Contract and compliance with the BEAD NOFO, Environmental and Historical Preservation, Build America Buy America, and other federal or state laws
- Subgrantees expend Federal funds as authorized within the period of performance
- The project is completed on time, and limits potential waste, fraud, and abuse of federal funding

Upon satisfactory review of submitted reports, UHBO will follow the Hawai'i BEAD Reimbursement Policy document to disburse funding to the subgrantee. If the reports yield an unsatisfactory review from UHBO, UHBO will reach out to the subgrantee and work with them to correct any issues.

Upon project close-out, UH will conduct a final review of all reports and a financial review to ensure all contractual obligations were met and BEAD funding is compliant with the NOFO.

Desk reviews may include virtual or in-person meetings with the subgrantee to review reporting and other issues identified during implementation, including, but not limited to, delayed construction or non-compliance.

#### Risk Assessment

At each reporting period, UHBO will evaluate and assign a risk category for each subgrantee. The risk categories will affect how this subgrantee monitoring plan will be adjusted and outline steps to be taken to minimize risk to the State's BEAD objectives. A subgrantee will be assigned a category of either low, medium, or high risk with respect to their ability to continue to carry out their proposed BEAD project timeline and compliance.

UHBO will use the accompanying Hawai'i BEAD Reimbursement Policy Documentation to proceed with any subgrantee reimbursement or funding clawback.

The following outlines the evaluation criteria for assigning a subgrantee risk category.

### **Low Risk**

A subgrantee will be considered low risk if it is shown that they meet all of the following criteria:

1. Subgrantee submits timely reporting
2. Subgrantee is responsive to UHBO inquiries
3. Deployment progress is on track or only slightly delayed
4. Subgrantee is compliant with BEAD requirements

Actions:

- Reporting: Standard reporting frequency as described above
- Site visits: Twice a year scheduled site visits, possible ad-hoc visits
- Desk Reviews: Standard desk reviews and meeting frequency

### **Medium Risk**

A subgrantee will be considered medium risk if it is shown that they meet one of the following criteria over two reporting periods:

1. The subgrantee does not submit timely reporting
2. The subgrantee is not responsive to UHBO inquiries
3. Deployment progress is severely delayed
4. The subgrantee is non-compliant with BEAD requirements

Actions:

- Reporting: Standard reporting frequency as described above
- Site visits: Twice a year scheduled site visits, possible ad-hoc visits
- Desk Reviews: Increased desk reviews and meeting frequency

### **High Risk**

A subgrantee will be considered high risk if it is shown that they meet more than one of the following criteria over two reporting periods:

1. The subgrantee does not submit timely reporting
2. The subgrantee is not responsive to UHBO inquiries
3. Deployment progress is severely delayed
4. The subgrantee is non-compliant with BEAD requirements

Actions:

- Reporting: Standard reporting frequency as described above
- Site visits: Increased scheduled site visits, possible ad-hoc visits
- Desk Reviews: Increased desk reviews and meeting frequency
- Clawback or suspension of funding reimbursement

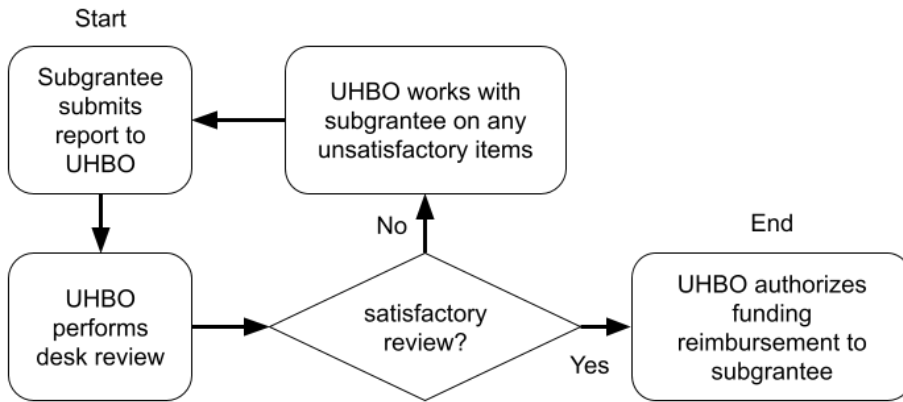


Figure 1: Flowchart of subgrantee monitoring process.

# Appendix C - Reimbursement Policy Documentation

## Hawai'i BEAD Reimbursement Policy Documentation

The following outlines Hawai'i's policy for reimbursing BEAD deployment projects.

Under the designation of the Governor, the State of Hawai'i Department of Budget and Finance (B&F) will be responsible for administering the BEAD Grant. B&F in collaboration with the University of Hawai'i under a Subrecipient Agreement and a Memorandum of Understanding (MOU) will be responsible for receiving BEAD funds from NTIA and disbursing them to the selected subgrantees.

The subgrantee will enter an Agreement for Services with the Research Corporation of the University of Hawai'i (RCUH) which is consistent with the Hawai'i BEAD Subgrantee Monitoring Plan. This will be a cost reimbursement contract where the responsibility is placed on the contractor for completion of the services in accordance with the contract terms.

The terms and conditions of this agreement will outline precise performance requirements such that it can be easily determined whether a contractor has successfully fulfilled its obligations under an agreement. Scheduled due dates that specify milestone targets will be clearly defined and may include dates for formal written reports or oral progress reports, as well as regular meetings to evaluate progress, identify problem areas, or address concerns. The services agreement will specify the start and completion dates as well as a compensation schedule according to milestone targets that must be satisfactorily met for the subgrantee to receive payment(s).

Per the services agreement, notwithstanding any other provision of the Agreement, RCUH shall have no duty to pay the subgrantee, nor any other person performing services on behalf of the subgrantee unless the subgrantees performance and all deliverables are to RCUH's satisfaction, and meet the objectives and requirements described in the agreement, including without limitation the performance requirements.

Subgrantees will submit quarterly progress reports detailing performance milestones met and invoices with expenditure reports to the University of Hawai'i Broadband Office (UHBO). All payments under this agreement shall be made only upon (a) submission by the subgrantee to RCUH original invoices specifying the amount due and certifying that services requested under the Agreement have been performed by the subgrantee and (b) confirmation of satisfactory performance as determined by RCUH.

UHBO will review the reports submitted by the subgrantee and upon favorable review for compliance and reporting requirements, UHBO will follow the process outlined in the:

[Amended Broadband Equity, Access, and Deployment Program \(BEAD\) Funds Transfer Procedures Between the Department of Budget and Finance \(B&F\) and the University of Hawai'i \(UH\) for Federal and Non-Federal Funds](#) memo dated September 18, 2024 and any future amendments to request funds from B&F.

Justifications for withholding reimbursement of funding or clawback funding to the subgrantee will be determined by UHBO in consultation with B&F. Unfavorable review of the submitted reports may lead to withholding reimbursement of funding until the issues are resolved between the subgrantee and UHBO. Justification for such actions includes, but is not limited to, the subgrantee not submitting timely reporting, unresponsiveness to UHBO inquiries, deployment progress being severely delayed, or non-compliance with BEAD requirements.

If a subgrantee breaches the agreement by failing to satisfactorily fulfill their obligations under this Agreement in a timely or proper manner, or failing to perform any of the promises, terms, or conditions of the Agreement, RCUH shall have the right to terminate the agreement in whole or in part, by giving written notice at least seven (7) calendar days (or any longer time as specified by RCUH in writing) before the effective date of termination. The notice shall provide the subgrantee with an opportunity to cure its default or take satisfactory corrective action within the seven (7) days (or other longer time as specified by RCUH). In the case of a partial termination, the subgrantee shall continue performance of the agreement to the extent it is not terminated.

As stated in the Hawai'i BEAD Subgrantee Monitoring Plan, subgrantees considered medium or high risk for compliance may have their funding withheld or clawed back depending on the severity of non-compliance, delays to the subgrantee's proposal timeline, and/or progress towards fulfilling BEAD objectives.

Any official notice of funding clawback will be from UHBO.

# Appendix D - EHP Documentation

## Hawai'i BEAD

### Environmental and Historic Preservation (EHP) Documentation

Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's programmatic and National Environmental Policy Act (NEPA) guidance.

The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

Hawai'i will work with awarded subgrantees to comply with applicable federal and state environmental and historic preservation (EHP) requirements. Subgrantees will be required to engage the services of a qualified EHP professional to assist in the analysis of potential EHP impacts and obtain the necessary federal, state, and local permits prior to conducting any deployment construction activities. This will include utilizing NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records for each project area, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval. UHBO notes that the State of Hawai'i itself has rigorous EHP requirements and an established regulatory structure, ensuring subgrantee will adequately address federal EHP requirements in this project. Additionally, UHBO will work with subgrantees to ensure that NTIA's best practices for NEPA compliance are followed prior to submission.

Based on review of proposed work in last mile deployments, UH anticipates that the majority of anticipated deployment activities will involve installation of fiber optic cables and associated equipment on or in existing poles or conduits, taking advantage of the primary categorical exemption for the majority of deployment project works.

Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.

The University of Hawai'i (UH) will serve as the joint lead agency with NTIA for NEPA under 42 U.S.C. 4336a. As the joint lead for NEPA, UH will be responsible for supervising subgrantees to prepare any environmental analyses and review documents for submission to NTIA for review via the ESAPTT. UH will work with subgrantees to meet their proposed timelines and obtain necessary permits and documents from appropriate entities for deployment.

UH will also contract with any required subcontracted expertise to address and oversee fulfillment of any gaps in subgrantee permitting, environmental and historical impact works.

Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.

Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.

The University of Hawai'i Broadband Office (UHBO) followed the NTIA's guidance<sup>1</sup> to review Hawai'i's chapter<sup>2</sup> of the FirstNet Non-Continuous Region PEIS issued in 2017. Following review, UHBO has determined that the analysis in the FirstNet PEIS for Hawai'i is sufficient for anticipated deployment-related projects within Hawai'i.

UHBO lists the following notable updates since the FirstNet PEIS chapter was released:

#### Regulatory Changes:

In 2019, Hawai'i passed laws<sup>3</sup> updating Hawai'i Administrative Rules (HAR) Chapter 11-200.1 for the environmental review process in the State. These laws include updated definitions, procedures, and criteria for agencies or persons performing activities impacting the environment to gain the necessary exemptions or permits.

#### Affected Environment:

Hawai'i's unique biodiversity and sensitive ecosystems make it the state with the most species on the U.S. Fish and Wildlife Service's Endangered Species list<sup>4</sup>. Since 2017, numerous species have been added, reclassified, or removed from the state's endangered species list<sup>5</sup>. The PEIS published in 2017 contains many species already listed in the 2025 Endangered Species list. A summary of the 2025 Endangered Species list is shown in the table below.

In addition, in March 2024, the U.S. Fish and Wildlife Service published a final rulemaking decision for 12 federally listed species, designating 119,326 acres of federal, state, and private lands on the Island of Hawai'i as critical habitats to minimize and/or mitigate impacts of federal actions to their critical habitat<sup>6</sup>.

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<sup>1</sup> [https://broadbandusa.ntia.gov/technical-assistance/DOC\\_NTIA\\_BEAD\\_Evaluating\\_FirstNet\\_PEIS](https://broadbandusa.ntia.gov/technical-assistance/DOC_NTIA_BEAD_Evaluating_FirstNet_PEIS)

<sup>2</sup> [https://broadbandusa.ntia.gov/sites/default/files/2025-07/Chapter\\_04\\_Hawaii\\_Non-Contiguous\\_PEIS.pdf](https://broadbandusa.ntia.gov/sites/default/files/2025-07/Chapter_04_Hawaii_Non-Contiguous_PEIS.pdf)

<sup>3</sup> <https://planning.hawaii.gov/erp/rules-update/>

<sup>4</sup> <https://ecos.fws.gov/ecp/report/species-listings-by-state-totals>

<sup>5</sup>

<https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=HI&stateName=Hawaii&statusCategory=Listed>

<sup>6</sup> <https://www.fws.gov/project/critical-habitat-12-hawaii-island-species>

Count of Scientific Name	Column Labels		
Row Labels	Endangered	Threatened	Grand Total
Arachnids	1		1
Birds	21	3	24
Crustaceans	3		3
Ferns and Allies	23		23
Flowering Plants	393	9	402
Insects	27	1	28
Mammals	1		1
Reptiles	1	2	3
Snails	3	1	4
<b>Grand Total</b>	<b>473</b>	<b>16</b>	<b>489</b>

Figure 2: Hawai'i Endangered Species List by Species

### National Registry of Historical Places

Hawai'i has also added numerous locations to the National Registry of Historical Places since 2017, and an updated list of the registry can be found at <https://dlnr.hawaii.gov/shpd/>.

#### Aloha from the Hawai'i State Historic Preservation Division

SHPD is comprised of three branches, Architecture, Archaeology, and History & Culture, and together they collectively strive to preserve and protect Hawai'i's historic identity. In Hawai'i, looking back is an integral part of going forward. SHPD is a part of ensuring that Hawai'i's treasured past is here for future generations to appreciate and learn from.

**I Mua Mondays:** Beginning on Monday, April 8, 2019, SHPD will institute "I MUA MONDAYS." Every Monday, until terminated or suspended in writing by the Administrator, SHPD will be closed to the public; we will not accept meetings, phone calls, emails, or "walk-ins" on Mondays. The SHPD Library will be closed to the public. This policy has been approved at the highest levels in the Administration.

I Mua Mondays will allow SHPD staff to work on critical technical and administrative tasks without interruption. This will eliminate distractions and help us expedite processing of project reviews, and the rest of our essential work. All SHPD staff are required to comply with the policies in this memorandum without exception.

[Nominated and Listed Properties on the Hawai'i and National Registers of Historic Places. Updated June 26, 2025.](#)

Figure 3: Hawai'i State Historic Preservation Division website link to the National Registry of Historical Places for Hawai'i

UHBO will make all subgrantees aware of such regulatory and affected environment updates in addition to the PEIS analysis to ensure compliance with federal and state EHP requirements.

Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for the disbursement of funds while projects await EHP clearances.

UHBO plans to include NTIA mandated EHP specific award conditions in contracts with subgrantees to ensure proper procedures and approvals are in place for the disbursement of funds while projects await EHP clearances.