



Louisiana Broadband Equity Access and Deployment (BEAD) Subgrant Program (GUMBO 2.0) Post-Subgrantee Selection Frequently Asked Questions (FAQs)

This document lists questions posed about the GUMBO 2.0 program from prospective Subgrantees during introductory calls. The purpose of this list is to provide supplemental information and transparency to all parties participating in the BEAD program. Nothing in this FAQ list nor any other supplemental guidance provided by ConnectLA is intended to modify Louisiana’s approved Initial Proposal nor draft Final Proposal. All GUMBO 2.0 prospective participants must thoroughly review previous documentation provided to familiarize themselves with all program requirements prior to submitting additional supporting documentation.

Release Date: December 19, 2024

FAQ Version: 1.0



Table of Contents

General Program Questions	3
Compliance and Reporting	3
Financial Questions.....	4

General Program Questions

This section outlines key program timelines and procedural details, including when subgrant agreements will be executed, and the flexibility subgrantees have in structuring their projects.

Q1: When will the subgrant agreements be executed?

ConnectLA's goal is to execute all subgrant agreements by March 3, 2025, pending approval of Final Proposal by NTIA. Any updates to the anticipated timeline for signing of subgrant agreements will be communicated by ConnectLA.

All participating subgrantees have the opportunity to review and provide feedback on the draft grant agreement, available [here](#). Comments on the subgrant agreement are **due by December 23, 2024**.

Q2: Can Projects be split into smaller subprojects?

GUMBO 2.0 is a statewide program, and each subgrantee will be required to enter into a single agreement covering the subgrantee's total awards in the state. Subgrantees may allocate their awarded BSLs into "projects" in the compliance platform as they deem appropriate, but the subgrantee's legal obligations, and performance against the reimbursement milestones, will be measured at the state level.

Q3: What assistance will be provided for permitting and the potential challenges and delays that may impact subgrantee project schedules?

The State is contacting the Parish Presidents and other agencies with information about the BEAD program and notifying them of the allowable permit charges set forth in [2024 Regular Session Act 632](#). Subgrantees facing permitting issues throughout the grant process should notify ConnectLA for support.

Q4: Can Subgrantees "swap" SPAs/BSLs with other Subgrantees?

No.

Compliance and Reporting

This section addresses critical compliance requirements, including environmental (NEPA/SHPO), domestic manufacturing (BABA), and labor standards (Davis-Bacon). It also explains the reporting systems ISPs will use to meet program requirements.

Q5: What are the requirements for National Environmental Policy Act (NEPA) review?

Subgrantees must provide detailed project descriptions, maps (Shapefiles are preferable, but .KMZ files will be accepted as well), and high-level design plans. The shapefiles must clearly indicate which segments are designated for aerial deployment and which are designated for underground deployment. Detailed engineering designs are not required initially but may be requested during reviews. Projects are anticipated to qualify for Categorical Exclusions (CATEX), but documentation must still be submitted for review and determination. NEPA approval is required prior to project implementation. If the proposed action is located in a historical area, additional review may be required prior to project implementation.

ConnectLA will publish further guidance on NEPA, including Louisiana's role as a joint lead agency, checklists, guidelines, reporting guidance, etc. In the meantime, guidance and resources are available on NTIA's website [here](#).

Louisiana GUMBO 2.0 Post-Subgrantee Selection FAQs

Q6: How will Build America, Buy America (BABA) compliance be ensured?

Subgrantees must use domestically manufactured materials consistent with the Department of Commerce [Limited General Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of Broadband Equity, Access, and Deployment Program](#), available [here](#). Reporting and tracking of BABA compliance will occur through the compliance platform. Subgrantee's should start obtaining the necessary BABA compliant Manufacturer Certification Letters, consistent with NTIA's guidance, and be prepared to utilize the compliance platform for reporting.

Q7: What is required for Labor compliance?

The submission of weekly certified payrolls (US Department of Labor Form wh347) will not be required. However, for all projects over \$5,000,000, subgrantee reports must include either certification that all workers are paid at or above prevailing wage rates (as per the Davis-Bacon Act) or must provide project employment and local impact reports on a semiannual basis (see [BEAD NOFO](#) Section VII.E.2 for additional details).

Q8: How is Connect LA attempting to alleviate administrative burden from the Subgrantees regarding the reporting requirements listed in the BEAD NOFO?

The compliance platform will simplify reporting and data uploads and will be a centralized location for reporting, allowing ISPs to upload data directly. Additionally, APIs are being developed to integrate with existing OSS/BSS systems to reduce administrative burdens. Further details regarding the APIs are forthcoming.

Financial Questions

This section covers the financial aspects of program participation, including reimbursement timelines, payment milestone structures, and eligibility of pre-award costs.

Q9: Will there be a single budget template for all subgrantees?

Yes, a budget template is being finalized and will be distributed. This will streamline the process and ensure consistency across submissions.

Q10: What happens if a subgrantee cannot provide a Letter of Credit (LOC)?

Each subgrantee must provide a LOC tailored to their specific award. Templates for LOCs will be provided to clarify LOC requirements. The template will be used as a guide, as each LOC should be tailored to the individual company.

Q11: When will reimbursement payments be processed?

Reimbursement requests can be submitted through the Ready platform. The first 30% of funds will be available upon submission and review of applicable supporting documentation. Subsequent payments will occur upon milestone completion and/or as discussed below, incremental deployment progress every six months. An explanation of milestones is set forth in [Supplemental Notice, v2](#).

Per SNv2, subgrantees may seek reimbursement for actual buildout progress every six months. For example, if Subgrantee has achieved the 10% of fixed locations milestone on March 1, 2025, and then deploys qualifying broadband to an additional 3% of fixed locations by September 1, 2025, Subgrantee may seek reimbursement for those 3% of locations while it continues to work toward the 35% milestone.

Payment per location reached = (Grant Funds * .7) / (Number of Project Locations to be served on Project completion + Number of CAIs to be served on Project completion)

A subgrantee's payment for achieving the next deployment milestone will be adjusted to ensure that the maximum cumulative disbursement does not exceed the percentage identified in the table above upon the subgrantee's achievement of a milestone.

Louisiana GUMBO 2.0 Post-Subgrantee Selection FAQs

Q12: Are pre-award costs eligible for reimbursement?

For purposes of GUMBO 2.0, pre-award costs are those incurred before the start date of the GUMBO 2.0 award in anticipation of the GUMBO 2.0 award where such costs are necessary for efficient and timely performance of the scope of work. These costs are allowable only to the extent that they would have been allowed if incurred after the start date of the GUMBO 2.0 award and only with the written approval of ConnectLA. If approved, these costs must be charged to the initial budget period of the GUMBO 2.0 award unless otherwise specified by ConnectLA.

Pre-award costs may be incurred beginning on the GUMBO 2.0 Provisional Award date, November 18, 2024.

Costs incurred by preliminary awardees in connection with NEPA reviews are considered allowable expenses. For more information on examples of allowable pre-award costs, see [Supplemental Notice, v2](#).