

Virgin Broadband Office (VIBO) Policies, Procedures, and Processes for Tracking Compliance with the BEAD Grant

Introduction

The **Broadband Equity, Access, and Deployment (BEAD) Grant** is a key federal initiative aimed at expanding broadband access in underserved and rural areas. It is essential that Virgin Broadband Office (VIBO) adhere to the grant's compliance requirements, which include meeting specific conditions outlined in the grant's award and ensuring proper tracking and reporting to maintain transparency and accountability.

This document outlines the policies, procedures, and processes VIBO will employ to track and manage compliance with the BEAD Grant, particularly compliance with specific Award Conditions (SACs). It also details the steps taken to ensure the proper use of the funds and fulfillment of the grant's objectives.

Scope

This document applies to all aspects of the BEAD Grant compliance tracking at Virgin Broadband Office (VIBO), including:

1. Monitoring of award conditions
2. Documentation requirements
3. Financial reporting
4. Milestone tracking
5. Risk management
6. Internal audits and reviews

1. Award Conditions (SACs) Compliance

The BEAD Grant is subject to specific award conditions (SACs) that must be met by VIBO throughout the funding period. These conditions are stipulated by the awarding body and define the obligations, reporting requirements, and limitations attached to the funds provided.

1.1 Monitoring SACs

VIBO will designate members of the Broadband Office as the team responsible for ensuring that all SACs are adhered to. This BEAD Director will regularly review the conditions outlined in the award agreement, which includes tracking specific compliance dates, documentation requirements, and any reporting intervals.

Responsibilities:

- Review and interpret SACs for clarity.

- Creating a Compliance Tracking Framework to monitor adherence to SACs.
- Establish timelines for compliance with each SAC.
- Ensure that OMB leadership is informed of SAC requirements.
- Organize regular check-ins and reporting on SAC progress.

1.2 Monitoring SACs

Monitoring SACs will be conducted through a systematic approach:

Initial SAC Review: Upon receipt of the grant award, the Compliance Officer/team will thoroughly review the SACs and map them to the operational activities of the BEAD project.

Timeline Establishment: Each SAC will be assigned specific deadlines and timelines for compliance.

Periodic Check-ins: Regular internal meetings will be scheduled to assess the status of SACs and ensure they are being met. These meetings will be attended by the Compliance Officer, key project leads, and other relevant staff.

Real-Time Updates: The compliance management system will allow real-time updates on the status of SACs, including tracking deliverables and milestone achievements.

1.3 Reporting Mechanisms

VIBO will track SACs through a digital management system. This system will maintain records of SAC deadlines, deliverables, and progress updates. Reporting will include:

- **Deliverables** track and report on status of NTIA deliverables.
- **Quarterly updates** on SAC compliance status to the VIBO leadership team.
- **Annual compliance reports** to the awarding authority.
- **Notifications** if non-compliance risks arise or deadlines are approaching.

2. Compliance Documentation and Recordkeeping

2.1 Documentation Requirements

VIBO will maintain detailed records of all documentation necessary to demonstrate compliance with the BEAD Grant award conditions. This includes:

- **Contractual documents** such as the original grant award, amendments, and agreements.
- **Financial records** such as invoices, payment receipts, and audit trails for the expenditure of grant funds.
- **Performance metrics** such as service coverage reports, programs data, and outreach reports.
- **Compliance certifications** legal, and regulatory compliance forms.

These documents will be stored electronically, ensuring they are accessible to authorized personnel but secure from unauthorized access. A dedicated compliance repository will be created within the VIBO digital filing system.

2.2 Retention and Accessibility

Compliance documentation will be retained for a minimum of **seven years** after the grant's completion or until any audits have been resolved. This retention period may be extended if required by the awarding body.

- All compliance records will be accessible to designated compliance officers and auditors.
- Access controls will be established to limit unauthorized access to confidential compliance documentation.

3. Financial Compliance and Reporting

3.1 Budget Management

VIBO will ensure the financial management of the BEAD Grant is in strict accordance with the award's budget stipulations. This includes:

- Tracking expenditures by creating separate accounts to track expenditures for each award.
- Budget amendments when changes to the grant's scope or funding allocation are required.
- Review allowability of expense prior to reimbursements.

3.2 Financial Tracking and Audit Procedures

A dedicated finance team will be tasked with overseeing the funds and tracking compliance with financial conditions, including:

- Semi-Annual financial reports summarizing expenditures and identifying any discrepancies.
- Semi-Annual Performance reports summarizing accomplishments and justification of expenditures.
- Annual Single Audits to assess financial compliance with the grant's requirements.
- Internal audit functions that will monitor fund allocation, expenditure tracking, and overall financial performance.

3.3 Payment Verification

Before any payments are processed, VIBO will verify the following:

- Payments comply with the BEAD Grant conditions.
- Services delivered or milestones achieved align with financial outlays.
- Proper documentation of payments, such as invoices and receipts, is in place.

4. Milestone Tracking and Reporting

4.1 Milestone Mapping

To ensure timely progress, VIBO will develop a **Milestone Tracking Matrix** that outlines key project milestones in relation to the BEAD Grant requirements. These milestones include but are not limited to:

- **Pre and Post Award Deliverables:** map and monitor progress of program administrative deliverables.
- **Service Activation:** Activation of new broadband access in target areas.
- **Public Engagement:** Public outreach and community engagement initiatives to increase adoption.

Each milestone will be tracked within a project management system, ensuring timelines and deliverables are met.

4.2 Progress Reports

VIBO will prepare detailed progress reports at regular intervals (quarterly or bi-annually) for submission to the funding authority. These reports will:

- Detail milestones achieved, including timelines.
- Describe any challenges faced and mitigation efforts undertaken.
- Include financial reports tied to specific milestones.
- Identify any delays or non-compliance issues and propose corrective actions.

5. Risk Management and Corrective Actions

5.1 Identifying Risks

The Compliance Team and project leads will regularly assess risks that could affect the compliance status of the BEAD Grant. Common risks include:

- Non-compliance with SACs due to misunderstanding or lack of awareness.
- Delays in project timelines impacting funding disbursements or milestone completion.
- Budget overruns due to unexpected costs or inefficiencies.

5.2 Corrective Actions

If any risks or instances of non-compliance are identified, VIBO will take immediate corrective actions, such as:

- Reallocating resources to meet milestones on time.
- Engaging with external experts for guidance on SAC compliance.
- Implementing more stringent internal controls on budget management.

VIBO will maintain a **Risk Management Log** to track the identification, assessment, and resolution of risks.

6. Internal Audits and Reviews

6.1 Periodic Internal Audits

VIBO will conduct regular internal audits, at least **once every six months**, to assess compliance with the BEAD Grant. These audits will examine:

- Financial transactions for correct allocation of grant funds.
- Documentation accuracy and completeness.
- Adherence to SACs and other reporting requirements.

6.2 External Audits and Oversight

VIBO will fully cooperate with any external audits or reviews conducted by the granting body or third-party entities to verify compliance. These may include:

- Random sampling of documentation for auditing.
- Interviews or surveys with project staff.
- On-site visits to review infrastructure and service deployments.

VIBO will implement recommendations from audit findings and ensure corrective actions are taken promptly.

Conclusion

The Virgin Broadband Office (VIBO) is committed to ensuring full compliance with the conditions of the BEAD Grant. By adhering to these policies, procedures, and processes for tracking compliance, VIBO will facilitate the effective and efficient use of funds, meeting milestones, and achieving the broader goal of expanding broadband access to underserved areas. Regular audits, diligent reporting, and close monitoring of compliance requirements will enable VIBO to remain transparent and accountable to all stakeholders involved in the BEAD Grant.