

Exhibit G: Reporting Requirements List & Compliance Documentation

CNMI Broadband Equity, Access, and Deployment (BEAD) Program Subgrant Agreement between CNMI BPD and [Subgrantee Name]

Field	Detail
Project Name/Identifier	[Unique Name or Identifier from Exhibit A]
Subgrantee Legal Name	[Full Legal Name of Subgrantee]
BPD Subgrant Award Identifier	[BPD Assigned ID]

Part 1: Reporting Requirements and Schedule

The Subgrantee shall submit the following reports to the CNMI BPD. Pursuant to 47 U.S.C. § 1702(j)(2)(A) and BEAD NOFO Section VII.E.2, reporting is **mandated to be at least semiannual for the duration of the subgrant. The schedule below implements more frequent reporting (Monthly and Semiannual)** to ensure robust tracking of the Project's progress and the effectiveness of the use of funds. Failure to submit timely and accurate reports may result in delayed fixed-amount disbursements or other remedies specified in the Subgrant Agreement.

Report Name	Frequency/Type	Due Date / Schedule	Key Content & Purpose Alignment
Broadband Monthly Report	Monthly (30 Days)	Specified date each month during the Period of Performance (PoP).	Summary of deployment status, identifying progress against milestones, adherence to technical standards, and risk management updates.
Semi-Annual Performance & Financial Report	At least Semiannually	Per a fixed schedule (e.g., April 30th and October 30th).	Tracks progress against approved plans. Includes performance testing outcomes, compliance certifications, and proportional match reporting.

Performance Measurement Reports	Annually	Date specified by BPD for annual testing cycle.	Detailed data files demonstrating compliance with speed, latency, and reliability (availability) standards of the BEAD Program. Must be retained for inspection.
Post Conditional Closeout Reports	Required at 6-month and 12-month marks	6 months and 12 months post-Closeout.	Includes the number of subscribers and verified speed test results.
Final Report & Closeout Certification	Once, upon completion	No later than 120 days after the end of the subgrant's Period of Performance.	Comprehensive summary of project accomplishments, final financial accounting (including full expenditure of match funds), certification of completion, final list/map of locations served, and all required closeout information.
Audit Reports	Annually (If threshold met)	Within 30 days of receipt of auditor's report or 9 months after end of audit period.	Single Audit or Program-Specific Audit if the Subgrantee expends \$750,000 or more in federal awards during its fiscal year.
Other Reports / Ad-hoc Requests	As Requested	Specified in the BPD/NTIA request.	May include responses to monitoring findings, updated plans (SCRM, Disaster Recovery, Maintenance), or data requests to support NTIA reporting obligations (e.g., FFATA reporting for sub-awards \$30,000 or more).

Part 2: Required Report Content and Compliance Certifications

All subgrantee reports must **certify that the information is accurate** and must be made available to NTIA upon request. The format for periodic financial reports will follow the BPD-provided template and align with **Fixed Amount Subawards** guidance.

1. Financial Reporting (Fixed Amount Subaward Model)

The Subgrantee must ensure financial tracking aligns with the fixed-amount subaward structure used by CNMI BPD.

- **Milestone Reporting:** Financial reports must detail the specific deployment milestones achieved during the period, corresponding to the agreed-upon fixed payments.
- **Match Verification:** The subgrantee must report the **proportional Non-Federal Match funds expended** for the milestone being claimed. Documentation (including valuation methods for in-kind match) must be available for audit.
- **Clawback Acknowledgment:** Reporting non-compliance, failure to meet milestones, or failure to expend funds correctly may result in the BPD withholding funds or enacting **clawback provisions**.

2. Performance and Technical Reporting

Subgrantees must submit data derived from mandatory performance testing to confirm the network meets performance requirements ($\geq 100/20$ Mbps BSLs, 1 Gbps symmetrical CAIs).

- **Speed/Latency:** Testing must be conducted at least annually during the subgrant period and follow methodology consistent with FCC practices. Results must be reported by BSL, demonstrating that **80 percent of a provider's download and upload measurements must be at or above 80 percent of the required speed**.
- **Reliability/Availability:** Providers must adopt network availability as the metric, corresponding to an annual uptime of **99.45 percent**. Subgrantees must report network **outages exceeding this availability requirement**.
- **Transparency:** The Subgrantee shall document the **methodology, standards, and parameters** used to measure network performance in each submission, including a change log, and must publish this documentation on their website.

3. Compliance and Risk Management

Subgrantees must certify continued compliance with critical federal mandates, including updating relevant plans.

- **Cybersecurity and Supply Chain Risk Management (SCRM):** Reports must confirm continued compliance with the approved **Cybersecurity Risk**

Management Plan and **SCRM Plan**. If any **substantive changes** are made to the plans, a new version must be submitted to BPD within 30 days.

- **Use of Prohibited Equipment:** Certification must confirm that BEAD funds (including non-Federal match) were **not used to purchase or support Covered Communications Equipment or Services** prohibited by the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. 1608).
- **Build America, Buy America (BABA) Compliance:** Subgrantees must maintain documentation demonstrating BABA compliance for all iron, steel, manufactured products, and construction materials incorporated into the project.
 - For domestically sourced items, maintenance of **Manufacturer Certification Letters** (including product name, description, location of manufacturing, and authorized signature) is required.
 - For finished waived electronics used pursuant to the BEAD BABA waiver, the Subgrantee must compile and share a **BABA Reporting Subrecipient Tracker**. This tracker must include the name of the manufacturer, product category (e.g., router, switch), 10-digit HS Code, product identifier, function description, and **Country of Origin**.
- **Labor Reporting (If Applicable):** For projects with **\$5,000,000 or more** in total costs, the subgrantee must provide **EITHER** a Davis-Bacon Compliance Certification **OR** a Project Employment & Local Impact Report. (*Note: The RPN eliminated non-statutory labor preferences, but retained underlying statutory reporting structures.*).

4. Record Retention

The Subgrantee must retain all subgrantee records, including network designs, diagrams, project costs, build-out timelines, and capital investment schedules submitted during the application phase, for a period of **at least three (3) years from the date of submission of the subgrant's final expenditure report** (closeout date) in accordance with **2 C.F.R. § 200.334**.

For [Subgrantee Name]:

By: _____

(Signature of Authorized Certifying Official)

Printed Name: _____

Title: _____

Date: _____