



Broadband Equity, Access, and Deployment (BEAD) Program

GUMBO 2.0 MONITORING PLAN

VERSION 2.0 | AUG 11, 2025



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Introduction

The Louisiana Office of Broadband Development and Connectivity (ConnectLA) is responsible for oversight of the Broadband Equity, Access, and Deployment (BEAD) Program to assure compliance with applicable Federal requirements and performance expectations are being achieved. 2 CFR 200.332 requires pass-through entities such as ConnectLA monitor subgrantees to ensure Federal funds are used in accordance with Federal, state, and local requirements and with the terms and conditions of the Federal award. BEAD Program funds will be administered by ConnectLA via the Granting Unserved Municipalities Broadband Opportunities 2.0 (GUMBO 2.0) grant program.

To this end, ConnectLA is required by 2 CFR 200.332(c) to evaluate each subgrantee's risk of noncompliance for the purpose of determining the appropriate level of subgrantee monitoring. Based on ConnectLA's risk assessment of the subgrantee, ConnectLA will provide training and technical assistance to subgrantees as well as monitoring subgrantee activities.

The purpose of the BEAD Program Monitoring Plan (Plan) is to provide guidance to ConnectLA management, staff, and consultants on the subgrantee risk assessment and monitoring process. The Plan is not intended to amend or replace the Subgrantee Agreement and should be used in conjunction with a careful review of the Subgrantee Agreement. The monitoring activities described in this Plan will be in conjunction with the Progress Report requirements listed in Attachment 10 of the Subgrantee Agreement.

Regulatory Requirements

The regulations set forth below form the basis for subgrantee monitoring for the GUMBO 2.0 Program by ConnectLA. ConnectLA shall provide oversight and monitoring of subgrantees to ensure compliance with all approved programs, functions, and activities under their grant. ConnectLA subgrantees must comply with all requirements contained in 47 U.S.C. § 1702, the BEAD NOFO, the BEAD Restructuring Policy Notice (Policy Notice), the Department of Commerce Standard Terms and Conditions, the General Terms and Conditions for the BEAD Program, and the Specific Award Conditions applicable to each individual award.

- [BEAD NOFO.pdf \(doc.gov\)](#) – The National Telecommunications and Information Administration (NTIA), U.S. Department of Commerce issued a Notice of Funding Opportunity (NOFO) to describe the requirements for all grant award under the BEAD program, authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60102, Public Law 117-58, 135 Stat. 429 (November 15, 2021) (Infrastructure Act or Act) also known as the Bipartisan Infrastructure Law.
- [BEAD Restructuring Policy Notice \(doc.gov\)](#) – NTIA issued the BEAD Restructuring Policy Notice on June 6, 2025, to provide updated implementation guidance under the BEAD Program. This Policy Notice clarifies and amends several provisions outlined in the original BEAD Notice of Funding Opportunity (NOFO). It reflects NTIA's commitment to ensuring a fair and open competitive process, aligning BEAD implementation with the statutory requirements



of the Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60102, Public Law 117-58, 135 Stat. 429 (November 15, 2021). The Policy Notice supersedes prior guidance where conflicts exist and is a mandatory compliance document for all participating subgrantees and Eligible Entities.

- [BEAD IPFR GTC 04 2024.pdf \(ntia.gov\)](#) – The General Terms and Conditions for the NTIA BEAD program requires ConnectLA to ensure each Subgrantee or contractor, including lower tier Subgrantees or subcontractors, complies with all applicable Federal, state, and local laws and regulations, and all applicable terms and conditions of this award. ConnectLA is responsible for ensuring that all contracts, including those necessary for design and construction of facilities, are implemented in compliance with the Terms and Conditions of this Award.
- [BEAD Policy and Waiver Notices | BroadbandUSA \(ntia.gov\)](#) – This site contains various policy notices and notices of waivers issued by NTIA in connection with the BEAD Program.
- [2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) – The government-wide regulations issued by the United States Office of Management and Budget (OMB) that contain OMB Guidance for Federal Financial Assistance. Included in 2 CFR Part 200 is Subpart D - Subrecipient Monitoring and Management which provides the overall framework for subrecipient monitoring.
- [ConnectLA Initial Proposal Volume II \(connect.la.gov\)](#) – Volume II covers the specific actions the State will take to ensure that every single location in Louisiana can receive high speed, affordable and reliable broadband access.
- [ConnectLA Final Proposal \(connect.la.gov\)](#) – The Final Proposal is the “final submission” for ConnectLA’s BEAD grant funding that describes how ConnectLA will ensure that every resident has access to a reliable, affordable, and high-speed broadband connection.

In any case where language between two or more authorities appears inconsistent, the relevant authorities should be read and interpreted in a manner which emphasizes consistency and harmonization across all relevant authorities. Where harmonization is impossible, ConnectLA will prioritize following the language contained in these authorities in the following order (from highest to lowest priority): 47 U.S.C. §1702; the award’s Specific Award Conditions; the General Terms and Conditions for the BEAD Program; the BEAD Restructuring Policy Notice (Policy Notice); the BEAD NOFO; the Department of Commerce Standard Terms and Conditions; the GUMBO 2.0 Act, the GUMBO 2.0 Rules and Louisiana’s BEAD Initial Proposal.

Roles and Responsibilities

ConnectLA will approach monitoring as a process-based set of quality and performance reviews, responses, and documentation of activities to provide reasonable assurance against noncompliance and underperformance in achieving GUMBO 2.0 goals. Monitoring process activities are distributed and assigned to facilitate ownership, consistency, shared understanding, internal controls, and quality assurance.



Common Terms Federal, state, local, tribal, and territorial governments will often use different grant terms that have the same meaning. These terms, for the most part, can be used interchangeably.

Recipient	=	Grantee/Awardee
Subaward	=	Subgrant
Subrecipient	=	Subgrantee
Subrecipient	≠	Subcontractor

Key roles and responsibilities in the monitoring and compliance process include:

- Grantor – National Telecommunications and Information Administration (NTIA)
- Grantee/Eligible Entity – Louisiana Office of Broadband Development and Connectivity (ConnectLA)
- Subgrantees – Monitored Entities
- Compliance Team – ConnectLA Staff and Consultants

GRANTOR – NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION (NTIA), U.S. DEPARTMENT OF COMMERCE

The National Telecommunications and Information Administration (NTIA), the grantor, will provide guidance and technical assistance support for ConnectLA's BEAD program. NTIA will primarily work with ConnectLA's leadership and program managers to provide BEAD Program oversight, including review of ConnectLA monitoring activities, and arrange for technical assistance.

ELIGIBLE ENTITY – LOUISIANA OFFICE OF BROADBAND DEVELOPMENT AND CONNECTIVITY (CONNECTLA)

ConnectLA is the non-Federal lead agency in charge of implementing the GUMBO 2.0 program. ConnectLA is responsible for monitoring and ensuring compliance with all GUMBO 2.0 funded activities by its subgrantees. To this end, ConnectLA will work with its consultants on the development of the overall monitoring strategy and GUMBO 2.0 monitoring plan. ConnectLA will also provide technical assistance to the subgrantees.

SUBGRANTEES

Subgrantees are subject to ConnectLA's monitoring and oversight. Subgrantees play an active role in fulfilling their contractual and statutory obligations to provide reasonable assurance that its activities are compliant through the following:



- Provide the required information and documentation to enable ConnectLA to assess the subrecipient's risk of noncompliance.
- Establish internal controls, including quality assurance/quality controls and self-monitoring procedures to reasonably ensure compliance.
- Cooperate with ConnectLA to carry out risk assessments, quality assurance/quality control, monitoring, and technical assistance initiatives.

COMPLIANCE TEAM – CONNECTLA STAFF AND CONSULTANTS

The Compliance Team consists of a cross-functional group of ConnectLA staff and consultants. Staff and consultants will collaborate on the following monitoring-related activities:

- Calculating and assigning risk scores for each subgrantee.
- Developing a subgrantee monitoring schedule.
- Executing the monitoring plan.
- Providing quality assurance/quality control for the monitoring process.
- Providing technical assistance to subgrantees.

Monitoring Review Scope Areas

Monitoring reviews may include financial and administrative, project performance, reporting, and applicable federal requirements. These areas may be included in the scope of either a desk or an onsite monitoring review.

Project Performance

Pursuant to 47 U.S.C. § 1702(h)(4)(C), the Compliance Team shall ensure that each subgrantee deploys its funded networks and begins providing broadband service to each customer that desires broadband service not later than four years after the date on which the subgrantee receives the subgrant for the applicable network. ConnectLA shall establish interim buildout milestones, enforceable as conditions of the subgrant, sufficient to ensure that Subgrantees are making reasonable progress toward meeting the four-year deployment deadline.

For LEO Capacity Subgrants, there is an extended period of performance that concludes ten years from the date upon which the subgrantee certifies to ConnectLA that broadband is available to every location covered by the project. Recipients of LEO Capacity Subgrants must continue to offer access to broadband service to each BSL served by the project throughout the period of performance as shown in Appendix C of the Restructuring Policy Notice.

The Compliance Team will monitor project performance against the established metrics and activity goals as outlined in the Subgrant Agreement. This review will include specific reporting requirements, objectives, and outcomes.



Network Capabilities

Under the BEAD Program, all subgrantees must ensure that their proposed networks meet specific quality and performance requirements as outlined in Section 60102(g)(1)(A) of the Infrastructure Investment and Jobs Act. These requirements are designed to ensure that every deployment funded by the BEAD Program is capable of delivering reliable, sustainable, and scalable broadband service to unserved locations, underserved locations, and Eligible Community Anchor Institutions (CAIs).

The Compliance Team will monitor subgrantee deployment activities to ensure compliance with applicable deployment obligations. These obligations include the following:

SPEED AND LATENCY

As determined by the FCC and defined by the BEAD Restructuring Policy Notice, subgrantees are required to deliver speeds of not less than 100 Mbps for downloads and 20 Mbps for uploads for broadband serviceable locations; speeds of not less than 1 Gigabit symmetrical for Community Anchor Institutions (CAIs); and has a latency less than or equal to 100 milliseconds. These standards are critical for supporting modern applications and services that require high-speed and low-latency connections.

The Compliance Team will review performance testing conducted by the subgrantee to verify compliance with this requirement. The Compliance Team may conduct additional testing at its discretion.

NETWORK OUTAGES

Subgrantees must have protocols in place to ensure network outages do not exceed, on average, 48 hours over any 365-day period, except in the case of natural disasters or other force majeure occurrence. Subgrantees should have a comprehensive outage management plan that includes preventive maintenance schedules, quick response teams for outage resolution, and clear communication channels for informing customers about outages and expected restoration times.

The Compliance Team will review outage plans as part of the overall monitoring process.

Deployment Requirements

All BEAD subrecipients must adhere to deployment requirements designed to ensure timely and compliant broadband infrastructure buildout. Subgrantees are required to deploy service-ready infrastructure by the timelines outlined in their grant agreements, with the goal of ensuring long-term network sustainability and affordability for end users.



DEPLOYMENT DEADLINES AND BENCHMARKS

All BEAD subrecipients must deploy their Funded Networks and begin providing broadband service to each eligible customer who desires it within four (4) years of receiving the subgrant. This timeline is a federal requirement and is designed to ensure timely delivery of broadband services to unserved and underserved areas in Louisiana.

The Compliance Team will monitor subgrantee performance against interim build milestones (i.e., miles of fiber deployed per unit of time) included in the Subgrant Agreement as well as project timelines provided by the subgrantee. Benchmarks may include miles of fiber deployed per unit of time.

CONDUIT ACCESS POINTS

Subgrantees are responsible for meeting the IIJA requirement to "include interspersed conduit access points at regular and short intervals" for any project that involves laying fiber optic cables or conduit underground or along a roadway. Subgrantees will be monitored for compliance with the requirement to provide conduit access points as required by BEAD NOFO.

SCALABILITY

As defined by the BEAD Restructuring Policy Notice, all Priority Broadband Projects awarded during the Benefit of the Bargain round must demonstrate the ability to scale network capabilities over time. Specifically, subgrantees must ensure that network infrastructure can meet the evolving connectivity needs of households and businesses and support future technologies such as 5G and successor wireless platforms.

The Compliance Team will evaluate the scalability of the deployed network through a review of project documentation, network design, and engineering specifications submitted by the subgrantee. Subgrantees may be required to provide evidence that the infrastructure can accommodate increased speeds and bandwidth without significant physical upgrades.

RELIABILITY AND RESILIENCE

In accordance with the Infrastructure Investment and Jobs Act (47 U.S.C. § 1702), subgrantees are required to incorporate best practices, as defined by the NTIA, to ensure the reliability and resilience of BEAD-funded broadband infrastructure by establishing risk management plans that account for technology infrastructure reliability and resilience, including from natural disasters (e.g., wildfires, flooding, tornadoes, hurricanes, etc.), as applicable, as well as cybersecurity best practices.

The Compliance Team may assess whether awarded projects demonstrate infrastructure resilience and operational reliability through design documentation, redundancy strategies, environmental hardening, and alignment with applicable industry standards. Evaluation will occur through documentation review and field verification where applicable. Emphasis will be placed on uptime expectations, continuity of service, network failover capacity, and emergency preparedness.



Service Obligations

Subgrantees are required to comply with service obligations included in the NOFO. These obligations include at minimum one Low-cost Plans available for eligible subscribers, Access to Service, and Cybersecurity and Supply Chain Risk Management. The Compliance Monitoring team will monitor subgrantees for compliance with these requirements.

Financial Management

The Compliance Team will monitor the subgrantee's ongoing capacity to meet the requirements of the Subgrant Agreement. Subgrantees must demonstrate they have and will continue to have sufficient financial resources to cover eligible costs for the GUMBO 2.0 project. In addition, subgrantees must maintain financial management systems that record and document compliance, permit the preparation of reports required for GUMBO 2.0 reporting, and facilitate accounting of GUMBO 2.0 funds per terms and conditions of the award.

Per 2 CFR 200.302, each subgrantee's financial management system must provide for the following:

- Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the Assistance Listings title and number, the Federal award identification number and year, the name of the Federal agency, and the name of the pass-through entity, if any.
- Accurate, current, and complete disclosure of the financial results for each Federal award or program under the reporting requirements outlined in 2 CFR 200.328 and 2 CFR 200.329.
- Records that adequately identify the source and application of funds for Federally funded activities. These records must contain information about Federal awards, authorizations, financial obligations, unobligated balances, assets, expenditures, income, and interest and be supported by source documentation.
- Effective control over and accountability for all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and ensure that they are used solely for authorized purposes. See 2 CFR 200.303.
- Comparison of expenditures with budget amounts for each Federal award.
- Written procedures to implement the requirements of 2 CFR 200.305.
- Written procedures for determining the allowability of costs under 2 CFR 200 Subpart E and the terms and conditions of the Federal award.

Prevention of Waste, Fraud, and Abuse

The Compliance Team will monitor award activities for common fraud schemes, including but not limited to:

- false claims for materials and labor;



- bribes related to the acquisition of materials and labor;
- product substitution;
- mismarking or mislabeling on products and materials; and
- time and materials overcharging.

Should ConnectLA detect any fraud schemes or any other suspicious activity, ConnectLA will contact its assigned NTIA Federal Program Officer and the Department of Commerce, Office of Inspector General Hotline, as indicated on their [website](#), as soon as possible.

Additionally, in accordance with 2 CFR 200.113, ConnectLA will disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. ConnectLA is required to report certain civil, criminal, or administrative proceedings to SAM.gov. Failure to make required disclosures can result in any of the remedies described in 2 CFR 200.339. (See also 2 CFR Part 180, 31 USC 3321, and 41 USC 2313.)

Audits

Compliance with 2 CFR 200 Subpart F and NOFO audit requirements will be monitored. Existing audit reports will be reviewed for audit findings and subgrantee plans for resolution.

If a Subgrantee is subject to the provisions of Subpart F of 2 C.F.R. Part 200 and expends \$1,000,000.00 or more in a year in Federal awards during its fiscal year, the Subgrantee must have an audit conducted for that year in accordance with the requirements contained in Subpart F of 2 C.F.R. Part 200.

If a Subgrantee is not subject to the provisions of Subpart F of 2 C.F.R. Part 200, it must submit on an annual basis to ConnectLA either:

- A financial related audit of each DOC award or subaward in accordance with Generally Accepted Government Auditing Standards (GAGAS); or
- A Project specific audit in accordance with the requirements contained in 2 C.F.R. § 200.507.

Procurement

Subgrantees of fixed amount subgrants pursuant to the above exceptions are not required to comply with the Procurement Standards set forth in 2 CFR 200.318-320 and 200.324-326. All other Procurement Standards, i.e., 2 CFR 200.317, 200.321-200.323, and 200.327, remain as requirements.



DOMESTIC PREFERENCE FOR PROCUREMENTS (BUILD AMERICA, BUY AMERICA) 2 CFR 200.322

The Compliance Team will monitor subgrantees for compliance with the Build America, Buy America Act (BABA). BABA established domestic content procurement preference requirements for Federal financial assistance projects for infrastructure, including the BEAD Program, consistent with Section 70912(2) of the Infrastructure Act. Subgrantees must comply with BABA consistent with applicable legal authorities, such as the Infrastructure Act, Executive Order 14005, 2 CFR Part 184, OMB Memo M-24-02, and any applicable waivers issued by the Department of Commerce.

PROHIBITION ON USE FOR COVERED COMMUNICATIONS EQUIPMENT OR SERVICES 2 CFR 200.216

Subgrantees (including contractors and subcontractors of Subgrantees) may not use BEAD grant funds (including non-Federal cost share) to purchase or support any communications equipment or service covered by either the Secure and Trusted Communications Networks Act of 2019 (47 USC 1608) or 2 CFR 200.216 (Prohibition on certain telecommunications and video surveillance services or equipment). The Compliance Team will monitor subgrantees for compliance with this requirement.

Environmental and Historic Preservation (EHP) Review

Subgrantees will be monitored for compliance with the requirements of all applicable Federal, state, and local environmental laws, regulations, and standards including those set forth in the Subgrant Agreement. This includes ensuring that a subgrantee does not initiate any GUMBO 2.0 funded implementation activities (site preparation, demolition, construction, ground disturbance, fixed installation, or any other implementation activities) prior to the completion of all EHP requirements.

Labor, Employment, and Workforce Development Requirements

The BEAD NOFO provisions that applied to workforce requirements have been superseded by the BEAD Restructuring Policy Notice, which eliminates the non-statutory requirements in the NOFO related to labor, employment, and workforce development. The BEAD Restructuring Policy Notice eliminated the NOFO requirements that gave strong preference to projects with extensive labor and employment commitments and required additional reporting for BEAD projects not subject to prevailing wage laws. ConnectLA shall satisfy the statutory requirement to “give priority to projects based on . . . [a] demonstrated record of and plans to be in compliance with Federal labor and employment laws” by requiring a subgrant applicant to certify compliance with such laws.



Recordkeeping

ConnectLA shall establish and maintain such records of GUMBO 2.0 activities and awards, as required by 2 CFR 200.334 and NTIA, to facilitate review and audit by NTIA, internal and external auditors.

ConnectLA will maintain records of each monitoring and desk review conducted, as well as training and technical assistance efforts, to demonstrate adequate oversight of its subgrantees and its efforts to correct noncompliance when necessary.

ConnectLA shall maintain records of its monitoring activities for a minimum period of three (3) years from the date of submission of their final financial report. Records to maintain include:

- Risk Assessments
- Monitoring Schedules
- Notification Letters
- Checklist(s)
- Monitoring Reports
- Monitoring Report responses
- Technical Assistance documentation – if applicable
- Applicable communication between monitors and subrecipients

Subgrantees must comply with GUMBO 2.0 recordkeeping requirements and terms within the subgrant agreement. ConnectLA shall review all program recordkeeping activities, timeliness of reporting, history of payments, program files, a subgrantee's ability to meet project milestones, and the effectiveness of the subgrantee's financial and administrative management systems.

ConnectLA expects subgrantees to:

- Retain all books, records, accounts, documentation, and all other materials relevant to the standard agreement for a minimum period of three (3) years after ConnectLA notifies the subgrantee that the GUMBO 2.0 grant is closed.
- Permit the State, Federal government, ConnectLA, and/or their representatives, upon reasonable notice, unrestricted access to any or all books, records, accounts, documentation, and all other materials relevant to the subgrantee agreement for monitoring, auditing, or otherwise examining said materials as required by 2 CFR 200.337.

Monitoring Process Overview

This monitoring plan describes how ConnectLA intends to systematically track, assess, and report on GUMBO 2.0 activities by subgrantees. The monitoring process involves engagement with subgrantees, identification and assessment of risks, systematic data collection and analysis, and reporting. The goal of the monitoring process is to keep a project on track by meeting its objectives, deadlines, and budgets.



The benefits of an effective monitoring program include:

- Showcase of project successes;
- Early identification and mitigation of potential waste, fraud, or abuse;
- Assurance that subgrantees are implementing projects on schedule and are making adequate progress toward achieving identified metrics, milestones, goals, objectives, and planned outcomes;
- Assurance that subgrantees comply with the terms and conditions of the award;
- Assurance that subgrantees meet financial and programmatic reporting requirements, adhere to submission deadlines, and provide accurate information;
- Assurance that subgrantees expend BEAD funds as authorized within the period of performance;
- Grant file organization and record keeping;
- Determination of tailored technical assistance and training; and
- Understanding of process improvements and documentation of lessons learned.

Monitoring Process Lifecycle

To ensure compliance with BEAD program requirements and promote successful project execution, ConnectLA has adopted a continuous risk-based monitoring framework for all subgrantees. This process is cyclical and responsive, allowing for adaptive oversight based on subrecipient performance and risk level. The lifecycle consists of four key phases:



1. **Assess:** ConnectLA begins by conducting an initial risk assessment of each subgrantee. This evaluation considers factors such as prior federal grant experience, internal controls, financial capacity, organizational history, and proposed project complexity. The outcome of this risk assessment determines the level and frequency of monitoring.
2. **Plan:** Based on the initial risk assessment, ConnectLA develops a monitoring plan and schedule tailored to each subgrantee. Higher-risk subgrantees may receive more frequent or detailed monitoring, while lower-risk subgrantees may be subject to periodic check-ins. Monitoring plans are documented and shared with subgrantees to promote transparency and preparedness.
3. **Review:** During this phase, ConnectLA implements the planned monitoring activities, which may include desk reviews, site visits, financial documentation reviews, performance audits, and technical compliance checks. ConnectLA issues monitoring reports detailing findings, recommendations, or required corrective actions, and offers technical assistance to help subgrantees address any deficiencies.
4. **Update:** As projects progress, ConnectLA continually evaluates each subgrantee's performance and updates their risk profile accordingly. Successful completion of milestones,



timely reporting, and demonstration of internal controls may reduce a subgrantee's risk rating, while missed deadlines or findings of noncompliance may trigger heightened oversight or enforcement actions.

Compliance and Monitoring Strategy

This Plan documents ConnectLA's strategy and processes for implementing the monitoring and compliance requirement for GUMBO 2.0 awards. The Plan will guide oversight of GUMBO 2.0 compliance areas including administrative, financial, and reporting requirements. The objective of monitoring and compliance is to determine if a subgrantee is carrying out its activities in a timely manner and in accordance with the Subgrant Agreement. To accomplish this:

- ConnectLA will deploy an initial and ongoing risk-based targeted assessment, quality checks, controls, monitoring instances, and technical assistance to mitigate the risk of noncompliance and underperformance.
- ConnectLA will respond to deficiencies and noncompliance risks through progressive programmatic support.
- ConnectLA will lead standardized, risk-informed reviews of program activities and documentation to ensure compliance and identify opportunities for operational improvements.
- ConnectLA will implement and require all GUMBO 2.0 subgrantees to implement internal controls and quality assurance/quality control processes to ensure compliance. These internal controls will be reviewed as part of the regular monitoring reviews.
- ConnectLA will emphasize quality assurance, quality control, communication, and feedback among all partners to ensure performance and mitigate the risk of noncompliance.
- ConnectLA will conduct construction inspections and technical on-site reviews of deployment activities.

ConnectLA will evaluate each subgrantee's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the GUMBO 2.0 subaward for purposes of determining the appropriate level of subgrantee monitoring. The following factors will be considered as part of the risk assessment process:

- Assess whether the subgrantee has new personnel or new or substantially changed systems.
- Assess the extent and results of Federal awarding agency monitoring.
- Assess the subgrantee's prior experience with the same or similar awards.
- Assess the results of previous audits, including whether or not the subgrant receives a Single Audit in accordance with 2 CFR 200 Subpart F.

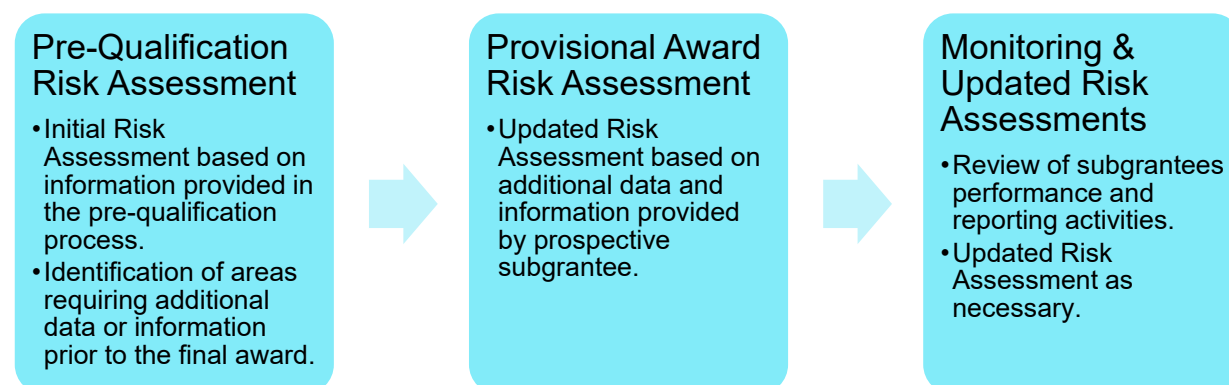


Risk Assessment

The Compliance Team will assess each subgrantee's risk of non-compliance with applicable Federal statutes, GUMBO 2.0 requirements, and terms and conditions of their Subgrantee Agreement. The Compliance Team will use the assessment to calculate an overall entity risk level that will be used to determine a risk-based monitoring strategy and schedule as required by [2 CFR 200.332\(d\)\(e\)](#). See also [2 CFR 200.206\(b\)\(1\)](#) and [2 CFR 200.329\(a\)](#).

Risk Assessment Process

ConnectLA will conduct risk assessments at multiple stages of the grant lifecycle to inform the level, type, and frequency of monitoring for each subgrantee. These risk assessments are dynamic and evolve as more information becomes available and as project performance is evaluated.



Risk assessment considerations include:

- **Financial stability:** Evaluation of financial condition based on the review of historical audited financial statements and current fiscal capacity to carry out the terms of the subaward.
- **Management systems and standards:** Assessment of the subgrantee's internal controls, management structure, and administrative systems to ensure compliance with applicable laws, regulations, and the Subgrant Agreement.
- **History of performance:** Analysis of the subrecipient's record in managing Federal awards, if it is a prior recipient of Federal awards, including timeliness of compliance with applicable reporting requirements, conformance to the terms and conditions of previous Federal awards, and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards.
- **Audit reports and findings:** Review of Single Audit results or other independent audits, including identification of any recurring findings, questioned costs, or material weaknesses.
- **Ability to effectively implement requirements:** Assessment of the subrecipient's ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities.



PRE-QUALIFICATION RISK ASSESSMENT

The initial risk assessment process is a component of the GUMBO 2.0 Pre-Qualification process. The ConnectLA Pre-Qualification Application Guide and the ConnectLA BEAD Initial Proposal Volume II (IPv2) specify the required financial, organizational, and technical capabilities applicants must possess to meet the minimum eligibility criteria for the GUMBO 2.0 program. Additionally, the Application Guide and IPv2 set forth requirements for adherence and compliance with occupational safety regulations, Federal labor and employment laws, cybersecurity and supply chain risk management, the National Environmental Protection Act (NEPA), the National Historic Preservation Act (NHPA), and the Build America, Buy America Act (BABA), as well as ownership information required by 47 CFR 1.2112(a)(1)-(7).

All applicants pre-qualified for GUMBO 2.0 are subject to an Initial Risk Assessment based on information provided during the Pre-Qualification process. Risk associated with GUMBO 2.0 applicants will be evaluated based on four (4) primary categories.

- **Financial Risk:** Assesses the financial capacity of the applicant. Incl audited financial statements, project funding commitments, and business plans.
- **Operational Risk:** Considers the applicant's organizational structure, managerial capabilities, and demonstrated experience in broadband deployment and related technologies. This includes evaluation of operational readiness to manage complex infrastructure projects, as well as internal capacity to ensure network resiliency, implement cybersecurity protocols, and address supply chain risks in accordance with BEAD and federal guidelines.
- **Technical Risk:** Evaluates the applicant's proposed technical approach, including network architecture, scalability, and compliance with BEAD performance requirements (e.g., 100/20 Mbps speeds, ≤ 100 ms latency). This review also includes an assessment of whether the proposed or actual buildout aligns with the network design, deployment plans, and documentation submitted during the application and award processes.
- **Compliance Risk:** Evaluates the strength of internal policies and procedures, as well as the applicant's ability to comply with applicable Federal, state, and local laws, including ownership structure and prior history with regulated programs.

Each risk category will be individually assessed as High, Medium, or Low. A composite score for the organization will be calculated and the organization will be assigned an overall risk level of High, Medium, or Low.

PROVISIONAL AWARD RISK ASSESSMENT

Successful bidders will receive a provisional award (unless stated otherwise) that outlines specific requirements that must be met prior to full award. Provisional award requirements include, but are not limited to, audited financial statements, letter of credit commitment letter, detailed business plans, network design, speed and latency information, organizational information, and policies and procedures. Prior to the final award, an updated risk assessment will be performed by ConnectLA to assess the potential risk level of the subgrantee.



All bidders receiving a provisional GUMBO 2.0 award are subject to an updated Risk Assessment based on information provided during the provisional award process. As potential subgrantees provide requested documentation, an updated Risk Assessment will be performed. Similar to the Pre-Qualification Risk Assessment, potential GUMBO 2.0 subgrantees will be evaluated on the same four (4) primary categories detailed above in the Pre-Qualification Risk Assessment section.

- **Financial Risk:** Assesses the financial capacity of the applicant. Incl audited financial statements, project funding commitments, and business plans.
- **Operational Risk:** Considers the applicant's organizational structure, managerial capabilities, and demonstrated experience in broadband deployment and related technologies. This includes evaluation of operational readiness to manage complex infrastructure projects, as well as internal capacity to ensure network resiliency, implement cybersecurity protocols, and address supply chain risks in accordance with BEAD and federal guidelines.
- **Technical Risk:** Evaluates the applicant's proposed technical approach, including network architecture, scalability, and compliance with BEAD performance requirements (e.g., 100/20 Mbps speeds, ≤ 100 ms latency). This review also includes an assessment of whether the proposed or actual buildout aligns with the network design, deployment plans, and documentation submitted during the application and award processes.
- **Compliance Risk:** Evaluates the strength of internal policies and procedures, as well as the applicant's ability to comply with applicable Federal, state, and local laws, including ownership structure and prior history with regulated programs.

Each risk category will be individually assessed as High, Medium, or Low. A composite score for the organization will be calculated and the organization will be assigned an overall risk level of High, Medium, or Low.

Provided a potential subgrantee supplies all requested documentation in a timely manner and receives a final GUMBO 2.0 award, the updated Risk Assessment will be used to determine the anticipated frequency and level of monitoring for the subgrantee.

ONGOING RISK ASSESSMENT

ConnectLA will continue to assess subgrantee risk to determine where additional recipient monitoring and support is required due to the identification of triggering events. A subgrantee may require additional monitoring at any time throughout the life of the project. Examples of common triggering events include:

- **Projects Significantly Behind Schedule:** Projects that fall behind schedule may suggest improper management of Federal funds, misunderstanding requirements, or misaligned staffing.
- **Large Budget Changes Identified:** Significant changes (10% or more) in any major budget category may suggest deficient budgeting capability or indicate irregular expenditures.
- **Financial Audit Findings:** Material audit findings suggest a lack of adequate financial management controls/processes necessary to prevent waste, fraud, and abuse.



- **Field Audit and Site Visits:** Projects will undergo standard field audits to verify actual deployment against reported progress, assess compliance with BEAD requirements, and validate the presence and functionality of funded infrastructure. Additional locations within the project may be added to reviews due to performance concerns.
- **Key Personnel Changes:** Changes in two or more key personnel may suggest a changing management environment, which may enable waste, fraud, and abuse.
- **Delinquent Reporting or Project Performance Issues:** Failure to submit required reports on time, submittal of incomplete or inaccurate data, or failure to demonstrate satisfactory progress toward milestones may indicate noncompliance, lack of internal controls, or project execution risks.

Other possible events that may also trigger an updated risk assessment and a recommendation for increased monitoring include, but are not limited to:

- Potential violation of federal or state laws
- Reports of fraud, waste, or abuse
- Significant modifications in project activities without prior approval
- Violation of financial compliance requirements
- Violation of performance compliance requirements
- Violation of award terms or conditions
- Implementation of a corrective action plan



Monitoring Activities

The initial focus will be to ensure subgrantee compliance and provide technical assistance when appropriate. Once monitoring review activities are complete, ConnectLA will follow-up with the subgrantee to ensure the subgrantee takes timely and appropriate action on all deficiencies pertaining to the GUMBO 2.0 award.



Subgrantee Monitoring Framework

The Compliance Team will develop a Summary Risk Assessment Report to determine monitoring frequency. This information will be rolled into a master Monitoring Plan and Schedule. Based on the risk level assigned to the subgrantee, ConnectLA will develop an overall monitoring schedule for subgrantees. Monitoring plans for each subgrantee will be delivered to the subgrantee during a Subgrantee Monitoring Kickoff Meeting.

Monitoring activities include conference calls with subgrantees, desk reviews of documentation submitted by subgrantees, and site visits for verification of deployment activities. The Compliance Team will monitor subgrantees assessed as higher risk more frequently and may require both desk and onsite monitoring reviews. Subgrantees with lower risk levels will require less frequent engagements and typically participate in desk monitoring events.

Monitoring Plan Development

A monitoring plan will be developed by the Compliance Team for each subgrantee based on the risk assessment. Monitoring by the Compliance Team will include, at a minimum, the following elements:

- **Communication with Subgrantee:** Frequent communication between the reviewer and the subgrantee is essential to ensure a compliant and successful collaboration. Documentation of communication will be captured.
- **Progress Reports:** Progress Reports will be required to be submitted by the subgrantee to document progress of the work completed versus funds spent. Progress reports will be reviewed, as necessary, by a subject matter expert (e.g., technical providers) to determine progress.
- **Deployment Activity Review:** Monitoring of deployment activities for compliance with BEAD NOFO requirements related to Network Capabilities (i.e., Speed and Latency, Network Outages), Deployment Requirements (i.e., Deployment Deadlines and Benchmarks, Conduit Access Points), and Service Obligations (Low-Cost Plans, Access to Service, Cybersecurity).
- **Risk Assessments:** To assist subgrantees in adhering to Federal and programmatic guidelines, specific high-risk items related to the risk assessment may also be included for awareness in the monitoring plan.
- **Additional Reviews:** Additional monitoring may include desk reviews of staffing, policies, and procedures that have changed; technical on-site visits to determine progress or verify project completion.
- **Closeout Process:** Award closeout includes activities related to ensuring that the work was performed and properly billed. At the end of the award, the subgrantee is responsible for ensuring that all documentation related to project performance and financial obligations are received.



General Monitoring Timeline Overview

ConnectLA has established a structured monitoring timeline to ensure effective oversight of all subgrantees participating in the GUMBO 2.0 program. While specific timelines may vary depending on risk assessments, project complexity, and subgrantee responsiveness, the general sequence of events remains consistent.

Monitoring engagements begin with formal notification approximately two to four weeks prior to the scheduled review. This advance notice allows subgrantees adequate time to gather required documentation and prepare for coordination with ConnectLA's Compliance Team. Subgrantees are typically expected to submit documentation within 7 to 10 business days of receiving the notification letter.

Following receipt of materials, the review period generally spans two to three weeks, during which the Compliance Team evaluates documentation, assesses compliance, and prepares preliminary findings. A conference is scheduled within one week of the review's conclusion to present results, clarify any concerns, and outline corrective action steps if needed. Subgrantees are expected to address any outstanding items or corrective actions within a typical follow-up window of 15 to 30 days.

This timeline ensures consistency, fairness, and transparency while providing subgrantees with the opportunity to actively engage in the monitoring process and improve program compliance.

Desk Review Monitoring

A desk monitoring review is the remote review of documentation submitted by the subgrantee. These reviews will also assess the subgrantee's training/programmatic support needs. Monitors will use the applicable checklists to guide their review.

NOTIFICATION

The Compliance Team will contact the subgrantee's point of contact to coordinate and schedule the Desk Review. This collaboration allows the subgrantee sufficient time to retrieve documentation, grant file access, and other essential preparation activities.

The Compliance Team will prepare and transmit a Monitoring Notification Letter to the subgrantee after confirming suitable dates and times for the monitoring event. The letter will discuss the monitoring schedule, identify the areas the team will review, and the names and titles of the monitoring reviewers. The letter will also identify specific documentation to be submitted by the subgrantee and a timeframe for submission to ConnectLA.



DOCUMENTATION SUBMISSION

Before the monitoring event, the Compliance Team will conduct pre-monitoring activities appropriate for the monitoring type. The Compliance Team will review available documents, begin their monitoring checklist, and identify and develop questions to be answered. The Compliance Team will provide the subgrantee with a detailed list of documents for review. The Compliance Team will coordinate with the monitored entity to receive the requested documentation and access to records necessary for the desk monitoring review.

MONITORING REVIEW

Due to the remote nature of this engagement, the Compliance Team will primarily work from documents provided by the subgrantee. Additional requests for documents may be sent to the monitored entity during the desk review period. Desk Review will typically include the following items:

- Conduct a review of the monitored entity's documentation.
- Document concerns, noncompliance, questions, or requests for documents required to complete review.
- Finalize preliminary results within monitoring review checklist(s).

CONFERENCE

At completion of the monitoring desk review, the Compliance Team will conduct a Conference with the subgrantee's designated point of contact and appropriate financial, technical, and program staff to present the preliminary results of the monitoring review. The monitored entity will be allowed to correct misconceptions or misunderstandings and ask questions to address concerns or noncompliance. The team will also discuss the next steps included in the post-monitoring phase. The Compliance Team will also utilize the Conference to provide technical assistance.

The Conference will include the following items:

- High-level review of issues that were identified.
- Provide or arrange for technical assistance to monitored entity staff.
- Provide a list of outstanding questions and documents the monitored entity must answer or provide after the Conference.

FOLLOW-UP

Following the Conference, if applicable, the Compliance Team will complete a Monitoring Summary Report based on the results of the Monitoring Activities. The Compliance Team may schedule a follow-up meeting or request written responses to ensure all outstanding items from the on-site review have been resolved.



Subgrantees are expected to address all outstanding items within 15 to 30 calendar days of the Conference. During this follow-up period, subgrantees must respond to identified deficiencies, provide any requested documentation, and submit written explanations or corrective action plans, as applicable.

The Compliance Team will review the follow-up materials to determine whether all issues have been adequately addressed. If additional clarification is needed, the subgrantee may be contacted for supplemental information. In cases where deficiencies are not sufficiently resolved, the Compliance Team may recommend further monitoring, request escalation, or initiate other remedies consistent with BEAD program compliance protocols.

Onsite Monitoring

Onsite monitoring involves monitors with technical experience in broadband deployment (Technical Field Auditors) providing technical reviews of progress and document planned versus actual project progress. The Technical Field Auditors will be responsible for conducting field audits and other comparative and technical analysis to ensure the projects are being executed as agreed upon in the Grant Agreements between ConnectLA and the subgrantee. Monitors will use the applicable checklists to guide their reviews.

During onsite monitoring engagements, the subgrantee's staff and contractors will be engaged as required to address monitoring needs. While onsite, the monitors will review deployment activities, complete checklists, and document observations during the review. The Compliance Team will document the monitoring process, the information reviewed, and the outcome, including any recommendations or findings.

NOTIFICATION

The Compliance Team will contact the subgrantee's point of contact to coordinate and schedule a monitoring site visit. ConnectLA will notify subgrantees that they have been selected for a monitoring site visit by letter to confirm the date and time of the site visit, participants, and materials, if any, to submit prior to the site visit. Subgrantee site visits may be scheduled based on disbursement requests, subgrantee's risk assessment, results of previous monitoring, or the status of deployment activities. The Compliance Team will prepare and transmit a Monitoring Notification Letter to the subgrantee after confirming suitable dates and times for the monitoring event. The letter will also identify specific information to be submitted by the program participant and a timeframe for submission.

PREPARATION

Like Desk Reviews, the Compliance Team will request the subgrantee provide specific documents needed for the review before the site visit. Prior to the site visit the Compliance Team will:

- Review the requested documentation.



- Formulate questions that require clarification.
- Document concerns and potential non-compliance issues.
- Identify opportunities for programmatic support.

Subgrantees prepare the requested documentation, notify personnel who will need to attend, and prepare project sites to be visited and, if applicable, tests to be run at the project sites.

MONITORING REVIEW

An entrance conference is a meeting to establish the purpose, intent, and expectations for the monitoring event. The Compliance Team will prepare an Entrance Conference Agenda and a Document Request Checklist. It will provide these documents to all staff in attendance, including the monitored entity staff. The meeting will be agenda-driven and will include the following:

1. Introduction of the Compliance Team.
2. Explanation of how the monitoring will be conducted.
3. Verify the activities to be reviewed and how access work areas will be granted.
4. Identification/confirmation of key program participant staff who will assist during the monitoring.
5. Discuss logistics and protocol for the monitoring visit (use of meeting rooms, computers, equipment, etc.)
6. Set up the activity schedule.

ACTIVITIES

The Technical Field Auditors will observe project site(s) and activities, documents, and any items from the preparation review for redress with the subgrantee. The primary focus of onsite monitoring visits is to determine:

- If actual deployment activities conform to progress reports submitted by the subgrantee.
- If deployment activities meet the technical requirements of the GUMBO 2.0 program.

During on-site monitoring engagements, it may be necessary to communicate with subgrantee staff or contractors to gain understanding and clarification regarding some aspects of the deployment activities. During these meetings, the Field Team may:

- Discuss the status of the activity.
- Clarify questions related to technical deployment issues and concerns.
- Submit follow-up document requests needed for review.
- Request additional information, as necessary.

CONFERENCE

During the Conference, the Compliance Team will meet with the subgrantee's designated point of contact and appropriate financial, technical, or other program staff to present the preliminary results of



the monitoring visit. The subgrantee will be allowed to correct misconceptions or misunderstandings and ask questions to address concerns or non-compliance. The Compliance Team will also discuss the next steps included in the post-monitoring phase. The monitoring team will also utilize the Conference to provide technical assistance. The Conference will be the final meeting onsite for a monitoring instance.

The Conference will include the following:

- Review of issues identified that may need corrective action.
- Technical assistance and discussion of technical assistance opportunities.
- Delivery of outstanding questions and requests for additional documentation that can answer questions about concerns and findings that arose during the monitoring event.
- Opportunities for the monitored entity to receive answers to questions related to the monitoring.

FOLLOW-UP

Following the Conference, if applicable, the Compliance Team will complete a Monitoring Summary Report based on the results of the Monitoring Activities. The Compliance Team may schedule a follow-up meeting or request written responses to ensure all outstanding items from the on-site review have been resolved. This may include additional clarification regarding site observations, deployment discrepancies, or documentation reviewed in the field.

Subgrantees are expected to respond to all outstanding requests or corrective actions within 15 to 30 calendar days of the Conference. During this period, subgrantees must submit any additional documentation requested during the field visit, respond to identified concerns, and provide written explanations or corrective action plans, as applicable.

The Compliance Team will evaluate all follow-up materials to determine whether field-related issues have been satisfactorily addressed. If further clarification is required, the subgrantee may be contacted for supplemental information. Unresolved issues may lead to additional field monitoring, formal escalation, or corrective action procedures as outlined in the Subgrant Agreement and BEAD compliance requirements.

Post-Monitoring Activity Phase

Once the Conference is completed, and any potential follow-up tasks have been resolved, the compliance team will begin the Post-Monitoring Phase. The post-monitoring process includes the following actions and components:

- Finalization of the Monitoring Assessment Checklist.
- Development of a Monitoring Report by the Compliance Team.
- ConnectLA administrative review and approval of the Monitoring Report.
- Submittal of the Monitoring Report to the monitored subgrantee.



- The Subgrantee's response to the Monitoring Report that notates steps taken to address corrective actions monitoring results, where applicable.
- ConnectLA review of the subgrantee's response to the Monitoring Report.
- ConnectLA issuance of a Monitoring Report Clearance Letter.

Checklist Finalization

After the Follow-Up period, the Compliance Team will finalize the Monitoring Assessment Checklist to determine potential findings or concerns for drafting the Monitoring Report.

Monitoring Report

As noted above, completion of the Monitoring Report depends on the Monitoring Assessment Checklist and the subgrantee's responses during the Conference or Follow-up period. If the subgrantee does not provide the requested information by the deadline set by the Compliance Team, the Compliance Team will note the non-response or insufficient response in the Monitoring Report.

1. **Monitoring Summary:** An overview of the monitoring process and results. After the monitoring activities have been concluded, the compliance team will complete the Monitoring Report. In the Monitoring Report, the monitoring team will identify deficiencies or noncompliance as findings or concerns. The Monitoring Report will include the following information:
2. **Findings:** The Monitoring Report will describe the findings, the corrective actions the monitored entity must take to remedy it, the deadline to remedy it, and the consequences of failing to remedy it.
 - a. The Monitoring Report will include the following information regarding each identified finding:
 - i. Condition: A list, description, and location of what was determined incorrect or wrong during the monitoring (i.e., in violation of requirements - where possible, descriptions and documentation of specific dates, documents, payments, costs, or activities associated with each finding).
 - ii. Criteria: The specific regulatory, statutory, or programmatic citation(s) of the requirement(s) the monitoring entity has violated.
 - iii. Cause: An explanation of why the condition (issue) occurred.
 - iv. Effect: A description of what happened because of the condition (issue) or what non-compliance scenario could happen.
 - v. Corrective Actions: Recommendations by the monitoring team that identify the action(s) needed to resolve the problem (condition/issue). Unless inapplicable or there are extenuating circumstances, this should include any necessary documentation and a deadline for completion. The report must sufficiently explain any corrective actions to enable the monitored entity to understand the requirements of future compliance.
3. **Concern:** A concern is a deficiency in administrative or program performance not based on statutory, regulatory, or program requirements. The Compliance Team will not impose or



require sanctions or corrective actions on subgrantees for concerns identified in the Monitoring Report; however, a subgrantee's failure to correct or improve a concern may lead to a finding.

- a. The Monitoring Report should include the following information regarding each area of concern(s) identified:
 - i. **Condition:** A list, description, and location of the area of concern. Due to the nature of concerns, the monitoring team may describe concerns more broadly than findings. Still, the monitoring team must identify the deficiency and any conditions contributing to the issue. If necessary, the report can reference specific dates, documents, payments, costs, or activities associated with the concern;
 - ii. **Cause:** An explanation of why the condition (issue) occurred and the condition that contributed to the area of concern;
 - iii. **Effect:** A description of what happened because of the condition (issue) or what further deficiency could happen; and
 - iv. **Recommendations:** Where applicable, a recommended or suggested list of steps that the monitored entity may take to address concerns, including a timeline/deadline for completion. *Note that corrective actions are not required for concerns.*
4. **Subgrantee Programmatic Support:** If required, the Monitoring Report will include information on available training and assistance to strengthen a subgrantee's performance.
5. **Areas of Merit:** The Compliance Team will include areas of merit in which the subgrantee exhibited exemplary performance or outcomes. The Compliance Team will note and describe areas of merit in the Monitoring Report to inform best practices and case studies for future projects.

Once the Monitoring Report has been completed and internally reviewed and approved by ConnectLA, the Monitoring Report will be transmitted to the subgrantee. The Compliance Team will document and save a copy of the final report, along with monitoring work papers and supporting information or documentation, within ConnectLA's system of record.

The subgrantee generally has 30 days from the date the Monitoring Report is issued to respond to findings and/or concerns. Subgrantees must respond within the timeline stated in the Monitoring Report, or they may be considered non-compliant. That response should either align with the corrective action identified within the report's applicable finding or concern or with a proposed alternate corrective action that the monitoring entity puts forth for consideration and review by ConnectLA and the Compliance Team.

CONNECTLA RESPONSE

The Compliance Team will review the actions and responses made by the subgrantee during the Monitoring Activities period. The review will consist of the following:

- Evaluate the subgrantee's corrective actions, plans to address findings or areas of concern, and plans to avoid future occurrences of concern or non-compliance.



- Determine whether the response to each instance satisfies the required corrective actions as requested in the Monitoring Report. Each instance of corrections will be designated as complete or incomplete.
- Based on the response, ConnectLA will close the monitoring event or escalate the corrective action until it is resolved.
- Record the response review results and save them to the monitored entity's project file.

ISSUE CLEARANCE LETTER

The subgrantee must work toward completing the corrective actions as stated in the Monitoring Report and/or propose alternative corrective actions that may be more appropriate for the subgrantee's internal or fiscal controls. Once the Compliance Team has determined that all corrective actions have been satisfied by the subgrantee, the Compliance Team will issue a Monitoring Report Clearance Letter. Issuing a Monitoring Report Clearance Letter to the subgrantee formally closes the concern or finding and closes the monitoring event. The monitoring will also be marked as complete.

ESCALATION TO REMEDY

If it is determined that the subgrantee's response to a corrective action is insufficient, the Compliance Team will issue a Monitoring Corrective Action Letter. The Monitoring Corrective Action Letter process will continue until all issues (findings) have been satisfied. Procedures to remedy incomplete corrective actions are mentioned in the Remedies for Noncompliance section below.

MONITORING CLOSEOUT

After all concerns and findings related to the monitoring have been resolved or addressed through planning, the monitoring event will undergo a quality check and be closed. The Compliance Team will use the checklist created for the monitoring engagement to perform a quality check to ensure all monitoring documentation is complete, approved by ConnectLA, and recorded.

Remedies for Noncompliance

ConnectLA will execute a tiered approach to remedy instances of non-compliance when deficiencies are identified during a monitoring engagement. During the Conference, the Monitoring Team will identify strengths and weaknesses, including areas of concern and non-compliance. The final monitoring results will be communicated via a Monitoring Report. The Monitoring Report will detail the concerns, non-compliance, and other relevant information.

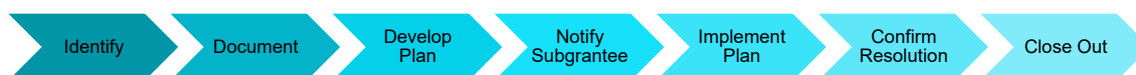
Specific examples of non-performance include, but are not limited to:

- Failure to comply with the low-cost broadband service option requirement set out in Section 60102(h)(4)(B) of the Infrastructure Act and LAC § 1701;
- Excessive removal of Broadband serviceable Locations set for in Subgrant Agreement;



- Failure to meet other Federal or Louisiana statutory obligations;
- Wasteful, fraudulent, or abusive expenditure of Award Funds; and
- Failure to provide Broadband Service that meets BEAD minimum requirements.

Corrective action is required for resolution of noncompliance activities. In general, the Corrective Action Process includes the following steps:



Programmatic Support

ConnectLA will provide subgrantees with programmatic support to address issues identified in the risk assessment or monitoring process. This support aims to ensure compliance with Federal, state, and local regulations and GUMBO 2.0 program requirements. ConnectLA will determine the nature and extent of support needed for each entity. Programmatic Support may be delivered through:

- Verbal or written advice;
- Formal training; and
- Documentation and guidance.

Corrective Actions

If a monitoring review identifies a finding or concern, the subgrantee must make the identified corrective actions or provide new information or clarification not reviewed during the monitoring review. Corrective actions follow the recommendations described in the subgrantee's Monitoring Report. The corrective actions identified in a subgrantee's Monitoring Report are intended to remove identified deficiencies and reduce risk scenarios of noncompliance and areas of concern. Subgrantees must demonstrate that corrective actions have been completed with supporting documentation when responding to the deadline set by ConnectLA.

Typical corrective actions include:

- Immediate Action Letters
- Performance Improvement Plans
- Corrective Action Plans

Results of NonCompliance

If a finding is identified during the monitoring process, ConnectLA reserves the right to institute repayment of GUMBO 2.0 funds issued to the subgrantee or other remedies as described in 2 CFR 200.339 and the NOFO, which include, but are not limited to:



- Temporarily withholding payments pending correction of the deficiency.
- Disallowing cost for all or part of the of the activity or action not in compliance.
- Wholly or partly suspending or terminating the applicable subaward.
- Initiation of suspension and debarment proceedings as authorized under 2 CFR part 180.
- Withholding the execution of additional subawards related to the project or program.
- Repayment of GUMBO 2.0 funds if the problem is an ineligible activity/project or a violation of other major program/technical requirements.

Repayment, Termination, and Sanctions

ConnectLA may impose penalties for nonperformance, failure to meet statutory obligations, or wasteful, fraudulent, or abusive expenditure of grant funds. Such penalties include, but are not limited to, imposition of additional award conditions, payment suspension, award suspension, grant termination, de-obligation/clawback of funds, and debarment of organizations and/or personnel. If it is determined that the subgrantee failed to comply with any material GUMBO 2.0 requirement and the subgrantee cannot or will not remedy such failure, ConnectLA may require the subgrantee to return up to the entire amount of the GUMBO 2.0 Grant Funds to ConnectLA.

Version History

VERSION	DATE	CHANGES
1.0	11/1/2024	Original
2.0	8/11/2025	Updated style, formatting, and name of document. Updated to incorporate new guidance per NTIA's BEAD Restructuring Policy Notice released on June 6, 2025.



ConnectLA