

SABINE COUNTY, TX – AWARD POLICY OVERVIEW

NTIA BROADBAND INFRASTRUCTURE PROGRAM (BIP)

Sabine County, TX (Awardee) is a recipient of the Broadband Infrastructure Program (Award Program), as administered by the U.S. Department of Commerce National Telecommunications and Information Administration (the Agency). The Awardee received approximately \$12.7 million in federal funding through the Award Program, as detailed in Award Agreement 48-08-I2212 (the award) for Awardee's project titled, Broadband Infrastructure Build Out in Sabine County, TX (the project).

Awardee will create policies to ensure the effective management and oversight of federal funds by establishing clear guidelines and policies in accordance with 2 Code of Federal Regulations (CFR) Part 200 the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 48 CFR Part 31 Contract Cost Principles and Procedures, the Award Program specific terms and conditions, Award Agency specific terms and conditions as outlined in Awardee's CD-450 Financial Assistance Award, and any subsequent CD-451 Amendment to Financial Assistance Award.

AWARD POLICY

Awardee understands the requirements for award performance, compliance, and reporting as demonstrated in this Award Policy Overview. Awardee will execute its award as directed through applicable award documentation and agreements to ensure full compliance with the Award terms and conditions.

Awardee will meet with contractors and subrecipients on a biweekly basis to monitor the progress of the project reviewing project status updates for construction, milestones, benchmarks, financials, and expenditures. During these meetings, Awardee will monitor any issues and the progress and completion of issue resolution.

Awardee will submit to necessary audits, file project performance reports, and other requirements within the timeframes specified in the relevant subparts of 2 CFR 200, the award agreement, and other programmatic documentation.

To ensure proper Award management, Awardee will compose and execute the following administrative, financial, and programmatic management policy types:

1. Program specific award management, monitoring, and evaluation
2. Award records and audit support
3. Awardee key personnel
4. Financial operations and cash management
5. Drawdowns
6. Award purchasing, procurement, and property management
7. Subrecipient management
8. Contractor management
9. Performance and financial reporting
10. Laws, statutes, and executive orders

1. Compliance Procedures

Upon final acceptance of the award, Awardee will implement the following award compliance procedures:

1.1 Establishing Compliance

Awardee's organization will establish policies and measures that align with federal regulations. Awardee will designate a compliance officer responsible for overseeing adherence to award conditions and ensuring that all staff are informed of these requirements.

1.2 Maintaining Compliance

To maintain compliance, Awardee's organization will:

- Execute its award management policies.
- Conduct regular internal audits to ensure adherence to award terms.
- Implement corrective actions promptly if non-compliance is detected.
- Provide ongoing training to staff on federal award requirements.
- Keep accurate and up-to-date records of all activities related to the award.

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- Meet with any contractors and/or subrecipients biweekly to review project status, any issues, and issue resolution.

2. Reporting Procedures

2.1 Reporting Requirements

Awardee will submit required financial and performance reports as specified by the Awarding Agency. These reports will include:

- Progress towards achieving the objectives outlined in the award agreement.
- Any challenges or obstacles encountered and the steps taken to address them.
- Financial expenditures and a comparison against the approved budget.
- Outcomes and impacts of the award-funded activities.

2.2 Submission Process

Performance reports will be submitted electronically through the designated federal portal no later than the specified deadlines. The compliance officer will review and approve the reports before submission to ensure accuracy and completeness.

2.3 Frequency of Reporting

The frequency of performance reporting will be determined by the awarding agency. Awardee understands that common reporting intervals include quarterly, semi-annual, and annual submissions.

3. Documentation and Retention

3.1 Required Documentation

Awardee will retain documentation that supports compliance and performance reporting. This includes (but is not limited to):

- Original award agreement and any amendments.
- Financial records, including invoices, receipts, and payroll documents.
- Meeting minutes, correspondence, and other relevant communications.
- Performance data and evaluation reports.
- Subrecipient and contractor information and documentation.

3.2 Retention Period

All documentation related to the federal award will be retained for a minimum of three years after the final report submission or as specified by the federal awarding agency. This includes ensuring that electronic records are backed up and accessible for audit purposes.

3.3 Federal Agency Inspection and Audit

Recipients will make all documentation available for inspection or audit by the federal awarding agency or other authorized entities. The compliance officer will facilitate the audit process and provide requested documents promptly.

REFERENCES AND REGULATORY BASIS

This policy is based on the following CFR documents:

- 2 CFR Part 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
- 48 CFR Part 31: Federal Acquisition Regulation (FAR) - Contract Cost Principles and Procedures.
- 45 CFR Part 75: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards.

By adhering to this policy, the award recipient enables compliance with federal regulations, maintain accountability, and maximize the effectiveness of the awarded funds.