



State of Nevada, Office of Science, Innovation, and Technology (OSIT)
State and Local Fiscal Recovery Funds (SLFRF)
Subrecipient Frequently Asked Questions (FAQs)
(as of November 2023)



Thank you for partnering with OSIT in implementing SLFRF grant funds, which supports the High Speed Nevada Initiative. Together we will ensure all Nevadans have access to an affordable, reliable, and scalable high-speed internet connection.

As a SLFRF subrecipient, we realize you may have questions throughout the process and the OSIT Team is dedicated to addressing them efficiently and effectively. The FAQ document is a resource for all SLFRF subrecipients.

This is a living document and will be updated accordingly. If you have a question that is not addressed in this document, please reach out to HSNVAdmin@ctcnet.us.

1. QUARTERLY FINANCIAL REPORTS AND BUDGET MILESTONES

1.1. What category should Fiber Design be included in for the Quarterly Financial Report and budget milestones?

Response: Fiber Design should be categorized as labor for the Quarterly Financial Report, the supporting Budget Detail Spreadsheet, and in applicable budget milestones.

1.2. Is a subrecipient required to submit a Project Change Request (PCR) when the overall project budget changes by 10% or when there is a 10% change in a budget category?

Response: A PCR is required in both instances. A PCR must be submitted for all project changes resulting in a budget increase of 10% or more overall or a 10% change between budget category allocations.

Incremental budget changes of less than 10% or budget decreases should be reported as part of the next Quarterly Financial Report.

2. SUBRECIPIENT QUARTERLY AND WEEKLY REPORTING

2.1. Are all subrecipients required to complete and submit the Quarterly Treasury Broadband Location Report?

Response: If the SLFRF funded project serves last-mile locations, then the subrecipient is required to complete the Treasury Broadband Location Report each quarter with currently available information, even if work has not yet begun at a specific site by the end of the reporting period.

If the SLFRF funded project does NOT serve last-mile locations (including businesses or community anchor institutions), then the Quarterly Treasury Report is not required. If this is the



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case with your project, please provide an email for documentation purposes each quarter when submitting your quarterly reports. This email should state that you are not including a submission of the Quarterly Treasury Broadband Location Report because your project does not serve any last-mile locations. Please repeat each quarter for the duration of the grant reporting period that this circumstance is applicable.

2.2. Are subrecipients required to submit the Quarterly Labor Requirements Report if the project is below the \$10 million threshold?

Response: No. If the total project expenditures from all sources, not just SLFRF funding, are less than \$10 million, then the Quarterly Labor Requirements Report is not required.

Each quarter when submitting your quarterly reports, please provide an email for documentation purposes. This email should state that you are not including a submission of the Quarterly Labor Requirements Report because total project expenditures from all sources are below the \$10 million threshold. Please repeat each quarter for the duration of the grant reporting period that this circumstance is applicable.

If the SLFRF funds received for this project are below \$10 million but exceed \$10 million in anticipated expenditures when combined with total project funding, then the Quarterly Labor Requirements Report is required.

2.3. What type of documentation is required for labor expenses performed by the subrecipient's internal workforce?

Response: When the subrecipient is providing the labor associated with a SLFRF funded project, such as Project Management, construction, or engineering, an invoice should be provided consistent with the documentation required for all completed work seeking reimbursement. Recommend information to document on the invoice include:

- dates of work completed;
- type of activity performed and completed; and
- number of hours worked and associated labor rates or cost justification.

2.4. Can vendors submit their daily site survey in advance for the coming week, or do they need to fill it out and submit each day?

Response: No. Daily site surveys must be submitted daily. The information enables the OSIT field team to perform spot checks of site work to ensure safety standards are properly observed.



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3. REGULATORY REQUIREMENTS

3.1. Does the Build America, Buy America Act (BABA) apply to SLFRF funds?

Response: No. BABA does not apply to SLFRF funds per Sections 6.18 and 6.19 of the SLFRF Final Rule FAQ's (updated August 2023). See Page 44 of the link for Sections 6.18 and 6.19: [2022 Final Rule Frequently Asked Questions](#).

3.2. Are subrecipients required to provide the National Environmental Policy Act (NEPA) certification for locations that are on federal property?

Response: Subrecipients are required to adhere to all federal and local regulations with regards to environmental and historical preservation. Therefore, all certifications must be completed prior to the start of construction, unless a waiver is provided.

4. Purchasing and Invoicing

4.1. If a subrecipient purchased bulk materials prior to signing the grant agreement that will be used in the SLFRF-funded project, can these costs be reimbursed?

Response: Generally, use of inventory on hand requires capitalization of the inventory upon use. Treasury clarified in the supplemental guidance from May 2023 that "costs incurred prior to an ISP [Internet Service Provider] receiving an award are reimbursable to the extent that they would have been allowable if incurred after the date of the federal award or subaward (for example, if an ISP purchased fiber or other broadband equipment in advance of being awarded a subaward or contract)."

How the cost is requested via the Reimbursement Request will be dependent on the subrecipient's balance sheet accounting and should be consistent with the valuation method used to calculate their financial statements. When requesting reimbursement, the subrecipient should submit only after the materials have been installed and include documentation about how the materials were used and invoices for their costs.