

# WTCS BEAD GRANT GUIDELINES

## BROADBAND WORKFORCE TRAINING AND UPSKILLING PROGRAM

**May 15, 2025:** Deadline to notify WTCS of estimated application amount

**June 3, 2025:** Applications open

**September 1, 2025:** Application deadline

College Period of Performance: June 15, 2025 – June 30, 2028

## BACKGROUND

The Broadband Equity, Access, and Deployment (BEAD) Program, provides \$42.45 billion to expand high-speed internet access by funding planning, infrastructure deployment and adoption programs in all 50 states, Washington D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

The Bipartisan Infrastructure Law created the BEAD Program with a goal of providing high-speed internet for all Wisconsinites. BEAD will support the deployment of fiber and other qualifying internet technology that provides service of 100/20 Megabits per second (Mbps) download/upload to all households and businesses in Wisconsin that lack access to 100/20 Mbps.

Wisconsin is allocated \$1,055,823,574 through a formula based on the state's proportion of locations lacking access to broadband service, calculated using Federal Communications Commission (FCC) maps. The Public Service Commission (PSC) of Wisconsin is managing these funds.

The Wisconsin Technical College System (WTCS) has established a memorandum of understanding (MOU) with the PSC to implement a Broadband Workforce Training and Upskilling Program to support workforce training and upskilling across the state. Colleges are invited to apply for funds based upon current related programs, planned expansions and future needs.

In order to allow us to best allocate all funds, colleges must notify WTCS via an email to grant manager Mandy Mayek by May 15, 2025 of the estimated amount you plan to apply for, the amount of additional funds you would use if available, or if you are declining to participate in this grant opportunity. If any college declines to participate, or elects to apply for a smaller amount, prior to May 15, 2025 the related funds will be made available to remaining colleges by June 2, 2025 to include in their applications if desired. Grants will be reviewed and approved on a rolling basis starting June 3, 2025. The deadline to apply for these funds is September 1, 2025. After September 1, 2025 any remaining unallocated funds will be made available to colleges with approved awards that have requested additional resources.

## SCOPE OF WORK AND ALLOWED ACTIVITIES

Grant activities are intended to develop and provide broadband related occupational education and training administered at WTCS locations and/or partner locations across the state. The targeted occupations include but

are not limited to broadband installation technicians, broadband service technicians, telecommunication specialists, fiber and wireless technicians, trenchers, radio frequency and field engineers, utility construction technicians, software developers, network and system administrators, technical support specialists and cybersecurity professionals. Training may also target transportation, construction, installation and other skills related to broadband deployment and underground facilities locating.

#### ELIGIBLE EXPENSES INCLUDE:

1. Personnel
  - a. Staff salary
  - b. Fringe
2. Eligible travel costs
3. Equipment
  - a. Not exceeding \$4999 per unit
4. Supplies and Service
  - a. Tuition Reimbursement
  - b. Scholarships for student expenses
  - c. Software
  - d. Marketing materials and services
5. Contractual
6. Other
  - a. Leases for equipment for instructional delivery of broadband related occupational education indicated in the scope of work

#### ALLOWED ACTIVITIES:

##### 1. PROGRAM AND COURSE DEVELOPMENT

Program development includes, but is not limited to, expanding existing programs, developing new programs, and establishing shared programs or partnerships. Example activities include:

- a. Program exploration, research, development, and implementation
- b. Curriculum development
- c. Instructor and staff professional learning & development

##### 2. INSTRUCTIONAL DELIVERY

Instructional delivery focuses on the design and implementation of education and training. This includes, but is not limited to, anything related to the teaching, learning and assessment of the required knowledge, skills, and abilities of a course. Example activities include:

- a. Delivery of instruction
- b. Student engagement
- c. Student assessment
- d. Student support services such as advising, tutoring and/or related activities

### 3. MARKETING, RECRUITMENT AND RETENTION

Marketing, recruitment, and retention involves creating and implementing strategies to attract, engage and retain target audiences or participants in the program. Activities are designed to ensure the program reaches the intended audience, maximizes participation, and retains engagement through program or course completion. **Activities in this area may not exceed 10 percent of the available funding.** Example activities include:

- a. Developing promotional materials
- b. Identifying and reaching out to potential participants, partners, or beneficiaries through targeted outreach, networking, or partnerships with community organizations
- c. Contracted services
- d. Student tuition
- e. Scholarships for student expenses
- f. Other student retention support

### 4. INDUSTRY ENGAGEMENT AND ADVISORY ACTIVITIES

Instructional engagement and advisory activities involve fostering partnerships and collaboration with industry stakeholders to support program success. Example activities include:

- a. Partnership development
- b. Collaborative and advisory opportunities
- c. Resource mobilization

## REPORTING REQUIREMENTS

Semi-annual reports are due January 3 and July 3 of each year. The report due January 3, will include activities completed July 1 - December 31. The report due July 3 will include activities completed from January 1 - June 30.

Client reporting is required.

Each report shall provide the units of education (example, course credits) earned in the period of performance and describe the eligible activities carried out. The college shall maintain sufficient records to substantiate all program expenditures and provide those records upon request.

The following metrics shall be reported in each semi-annual report:

#### STAFFING:

- Name of position, and percent effort planned on the scope of work, percent effort actual on the scope of work.

#### PROGRAM AND COURSE DEVELOPMENT:

- List any curriculum that was developed, improved, or scaled through the Broadband Workforce Training and Upskilling Program by college.
- List any training attended by WTCS or college staff through the Broadband Workforce Training and Upskilling Program.

## INSTRUCTIONAL DELIVERY

- Number of students served by Broadband Workforce Training and Upskilling Program by college.
- Number of credits awarded through Broadband Workforce Training and Upskilling Program by course and by college.
- Number and name of skill certifications or credentials issued through Broadband Workforce Training and Upskilling Program by college.

## MARKETING RECRUITMENT AND RETENTION

- Summarize recruitment, retention and marketing activities and describe any detail that activities are effective.
- List the number of students that received tuition assistance, scholarships or other support through the program in order to participate in the Broadband Workforce Training and Upskilling Program.

## INDUSTRY ENGAGEMENT AND ADVISORY ACTIVITIES

- Number and description of industry engagement activities.
- Estimated attendance at each industry engagement activity.
- Number and description of advisory activities.
- Listing of any partnerships, collaborations, resources mobilized during the reporting period.

## SUMMARY:

- Narrative Summary of Key activities during the report period.
- Progress towards major milestones.
- Unexpected achievements.
- Challenges to implementing planned activities.
- Changes to plans.

The Subgrantee shall establish and publicize telephone numbers for the Fraud hotline established by the Commission at 1-800-225- 7729 or 1-608-266-2001 (Local) or Subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud, or abuse in the Program.

## AWARD AMOUNTS

\$12,580,456 in grant funds are available. Colleges are invited to apply for funds up to the amounts listed below. Northwood Technical College and Northeast Wisconsin Technical College have larger maximum grant awards due to existing commitments and extensive prior and ongoing work related to broadband workforce expansion and programming. Colleges are encouraged to collaborate where appropriate and may combine funds for consortium grant applications.

College	Maximum Grant Award
Blackhawk	\$500,000

CVTC	\$500,000
Fox Valley	Declined to participate
Gateway	\$500,000
Lakeshore	\$500,000
Madison College	\$500,000
Mid-State	\$500,000
Milwaukee Area	\$500,000
Moraine Park	\$500,000
Nicolet College	\$500,000
Northcentral	\$500,000
Northeast	\$3,040,228
Northwood Tech	\$3,040,228
Southwest	\$500,000
Waukesha County	\$500,000
Western	\$500,000
<b>Total Funds Available to Colleges</b>	<b>\$12,580,456</b>

## INELIGIBLE COSTS

The following costs are specifically identified as prohibited under the BEAD Program:

1. **Equipment over \$4999. (Only equipment leases are allowed for items over \$4999.)**
2. **Any construction, deployment of infrastructure, capital improvement/infrastructure upgrades, modification to buildings, site preparation for construction, activities that may cause ground disturbance or cause an impact to the environment or historic properties.**
3. Prohibition on Profit and Fees. A profit, fee, or other incremental charge above actual cost incurred by an Eligible Entity or Subgrantee is not an allowable cost under this Program.
4. Prohibition on Use of Grant Funds to Support or Oppose Collective Bargaining. The Subgrantee may not use grant funds, whether directly or indirectly, to support or oppose collective bargaining.
5. Any other ineligible costs set forth in the Infrastructure Act and subsequent implementing rules and regulations and regulatory guidance.
6. Any ineligible costs as determined by the PSC.
7. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
8. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises; and
9. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.

## FEDERAL COMPLIANCE REQUIREMENTS

This section sets forth federal funding requirements applicable to federal funds under the BEAD Program, authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60304(c), Public Law 117-58, 135 Stat. 429 (November 15, 2021). Colleges agree to comply with the federal regulations applicable to this award listed below and all other applicable federal statutes, regulations, executive orders, and requirements applicable to this Agreement not described in Attachment B.

1. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. Part 200, other than such provisions as the Department of Commerce may determine are inapplicable to this Award and subject to such exceptions as may be otherwise provided by Commerce. Subpart F – Audit Requirements of the Uniform Guidance, implementing the Single Audit Act, shall apply to this award.
2. Universal Identifier and System for Award Management (SAM), 2 C.F.R. Part 25, pursuant to which the award term set forth in Appendix A to 2 C.F.R. Part 25 is hereby incorporated by reference.

3. Reporting Subaward and Executive Compensation Information, 2 C.F.R. Part 170, pursuant to which the award term set forth in Appendix A to 2 C.F.R. Part 170 is hereby incorporated by reference.
4. Recipient Integrity and Performance Matters, pursuant to which the award term set forth in 2 C.F.R. Part 200, Appendix XII, is hereby incorporated by reference.
5. Governmentwide Requirements for Drug-Free Workplace, 31 C.F.R. Part 20.
6. New Restrictions on Lobbying, 31 C.F.R. Part 21.
7. Environmental and National Historical Preservation Requirements. The Subgrantee is responsible for obtaining all necessary federal and local governmental permits and approvals necessary for the proposed work to be conducted.
8. Protections for Whistleblowers.
  - a. In accordance with 41 U.S.C. § 4712, the Subgrantee may not discharge, demote, or otherwise discriminate against an employee in reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a federal contract or grant, a gross waste of federal funds, an abuse of authority relating to a federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal contract (including the competition for or negotiation of a contract) or grant.
  - b. The Subgrantee shall inform its employees and contractors, in writing, in the predominant native language of the workforce or organization, of employee whistleblower rights and protections under 41 U.S.C. § 4712, as described above and at <https://www.oig.doc.gov/Pages/Whistleblower-Protection-Program.aspx>.
9. Increasing Seat Belt Use in the United States. Pursuant to Executive Order 13043, 62 FR 19217 (Apr. 18, 1997), the Subgrantee should encourage its contractors to adopt and enforce on-the-job seat belt policies and programs for their employees when operating company-owned, rented or personally owned vehicles.
10. Reducing Text Messaging While Driving. Pursuant to Executive Order 13513, 74 FR 51225 (Oct. 6, 2009), the Subgrantee should encourage its employees, grantees, and contractors to adopt and enforce policies that ban text messaging while driving, and the Subgrantee should establish workplace safety policies to decrease accidents caused by distracted drivers.
11. Assurances of Compliance with Civil Rights Requirements.
  - a. As a condition of receipt of federal financial assistance under this MOU, the Subgrantee ensures its current and future compliance with the following:

- i. Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d *et seq.*) and the Department of Commerce’s implementing regulations, published at 15 C.F.R. Part 8, which prohibit discrimination on the grounds of race, color, or national origin under programs or activities receiving federal financial assistance;
  - ii. Title IX of the Education Amendments of 1972 (20 U.S.C. §§ 1681 *et seq.*) which prohibits discrimination on the basis of sex under federally assisted education programs or activities;
  - iii. The Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12101 *et seq.*) which prohibits discrimination on the basis of disability under programs, activities, and services provided or made available by Eligible Entity and local governments or instrumentalities or agencies thereto, as well as public or private entities that provide public transportation;
  - iv. Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), and Department of Commerce implementing regulations published at 15 C.F.R. Part 8b, which prohibit discrimination on the basis of handicap under any program or activity receiving or benefiting from federal assistance;
  - v. The Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101 *et seq.*), and Department of Commerce implementing regulations published at 15 C.F.R. Part 20, which prohibit discrimination on the basis of age in programs or activities receiving federal financial assistance;
  - vi. Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*, which provides that it is an unlawful employment practice for an employer to discharge any individual or otherwise to discriminate against an individual with respect to compensation, terms, conditions, or privileges of employment because of such individual’s race, color, religion, sex, or national origin. Note in this regard that Title VII, 42 U.S.C. § 2000e-1(a), expressly exempts from the prohibition against discrimination based on religion “a religious corporation, association, educational institution, or society with respect to the employment of individuals of a particular religion to perform work connected with the carrying on by such corporation, association, educational institution, or society of its activities;” and
  - vii. Any other applicable non-discrimination law(s). Application requirements, award terms, and conditions do not impose civil rights and nondiscrimination law compliance requirements on Indian Tribes or Native Entities beyond what would otherwise apply under federal law.
- b. In addition, the Subgrantee ensures that it will account for and satisfy the following authorities:
- i. Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (65 Fed. Reg. 50121), which requires federal agencies to examine the services that they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Note that the Department of Commerce issued policy guidance on March 24, 2003 (68 Fed. Reg. 14180) to articulate the Title VI prohibition against national origin discrimination affecting LEP persons and to help ensure that non-federal entities provide meaningful access to their LEP applicants and beneficiaries.



- ii. Executive Order 13798, Promoting Free Speech and Religious Liberty, and Office of Management and Budget, M-20-09—Guidance Regarding Federal Grants and Executive Order 13798 (January 16, 2020), which provide that States or other public grantees may not condition sub-awards of federal grant money in a manner that would disadvantage grant applicants based on their religious character.

12. If the amount of the award under this Agreement is greater than \$100,000.00 the undersigned official(s) certifies that to the best of his or her knowledge and belief, that:

- a. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned or Grantee, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- b. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, Agency shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- c. The Subgrantee shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all Subgrantees shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

13. All contracts made by the Subgrantee under a federal award, as applicable must contain the contract provisions required under 2 C.F.R. Part 200, Appendix II to Part 200 Contract Provisions for Non-Federal Entity Contracts Under Federal Awards. Specifically, the Subgrantee must ensure that all contracts in excess of \$10,000 address termination for cause and for convenience, including the manner by which it will be affected and the basis for settlement.
14. In accordance with 2 C.F.R. § 200.316, any real property, equipment, or intangible property acquired or improved with a federal award must be held in trust by the Eligible Entity or Subgrantee as trustee for the beneficiaries of the project, other eligible activity, or program under which the property was acquired or improved.

15. Domestic Preference for Procurements (Buy American). The Subgrantee will provide a preference for the procurement or use of goods, products, or materials produced in the United States as described in the Infrastructure Act, Division G, Public Law 117-58, 135 Stat. 429.
16. Prohibition On Use of Grant Funds for Covered Communications Equipment or Services under the Secure and Trusted Communications Networks Act. The Subgrantee may not use BEAD funding to purchase or support any covered communications equipment or service, as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. § 1608).
17. Hatch Act. Agency agrees to comply, as applicable, with requirements of the Hatch Act (5 U.S.C. §§ 1501-1508 and 7324-7328), which limit certain political activities of State or local government employees whose principal employment is in connection with an activity financed in whole or in part by this federal assistance.
18. Statutes and regulations prohibiting discrimination, without limitation, the following:
  - a. Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d et seq.) and Treasury's implementing regulations at 31 C.F.R. Part 22, which prohibit discrimination on the basis of race, color, or national origin under programs or activities receiving federal financial assistance;
  - b. The Fair Housing Act, Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§ 3601 et seq.), which prohibits discrimination in housing on the basis of race, color, religion, national origin, sex, familial status, or disability;
  - c. Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of disability under any program or activity receiving federal financial assistance;
  - d. The Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101 et seq.), and Treasury's implementing regulations at 31 C.F.R. Part 23, which prohibit discrimination on the basis of age in programs or activities receiving federal financial assistance; and
  - e. Title II of the Americans with Disabilities Act of 1990, as amended (42 U.S.C. §§ 12101 et seq.), which prohibits discrimination on the basis of disability under programs, activities, and services provided or made available by state and local governments or instrumentalities or agencies thereto.

## ADDITIONAL REQUIREMENTS

### NO DUPLICATION OF FEDERAL FUNDS

No federal funds may be used to duplicate costs, services, connections, facilities, or equipment that have been authorized through another federal program. The PSC reserves the right to disallow any expenses that they determine constitute duplication of federal funds or service

and/or to direct the Grantee to reallocate the funds to allowable activities within the project or for another project.

### **RESTRICTION ON HUMAN SUBJECT RESEARCH**

No funds under this award may be used for human subject research. The Department of Commerce regulations related to the protection of human subjects are found in 15 CF.R. Part 27. Implementation activities may not occur and implementation costs may not be incurred until a Human subject waiver is received from the Department of Commerce.

### **MINORITY BUSINESSES AND WOMENS BUSINESS**

Minority Businesses Enterprises (MBEs) and Women's Business Enterprises (WBEs) are major catalysts for economic growth and job creation. However, data shows that MBEs and WBEs historically face significant contracting disparities compared to other businesses. Consistent with 2 C.F.R. § 200.321, the Subgrantee shall take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

#### **WTCS Contacts:**

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