

ReConnect NOFO 5 Workshop Reno, NV – February 28, 2024



ReConnect Round 5 Workshop – Day 2

9:00 a.m.-5:00 p.m. Office Hours

8:30-8:45 a.m. Opening Remarks

8:45-10:15 a.m. Financial Requirements Overview and Live Demo

10:15-10:30 a.m. Break

10:30 a.m.-12:00 p.m. Environmental Requirements Overview and Live Demo

12:00-1:15 p.m. Lunch Break

1:15-2:15 p.m. Grant Accounting

2:15-3:15 p.m. Evaluation Criteria and Application Submission

3:15-3:30 p.m. Break

3:30-4:30 p.m. Key Considerations for Projects Serving Tribal Lands

4:30-4:45 p.m. Open Q&A

4:45-5:00 p.m. Day 2 Closing Remarks



ReConnect Program

Financial Overview/Requirements



Agenda

- Introduction
- Regulatory Financial Requirements
- Financial Key Considerations
- Financial Tab Live Demo
- Q&A



Introduction



Introduction

- ReConnect Program Regulation 7 CFR 1740
 - Details key financial requirements.
- ReConnect Program NOFO
 - o Provides additional information on financial requirements and procedures.



Regulatory Financial Requirements



Costs (7 CFR 1740.12)

- Only eligible costs incurred post award, except for approved pre-application expenses
 - Any application that proposes to use award or match for ineligible costs may be rejected
 - Example: Operating costs are not eligible costs
 - Example: Vehicle purchase or lease costs generally are not eligible, the cost of a special-purpose vehicle necessary to construction is eligible
- Refer to 1740.12 as you gather your cost information
- Eligible costs must be consistent with in 2 CFR 200, Subpart E, Cost Principles
- Costs must be reasonable, allocable, and necessary to the project

Financial Feasibility Elements (7 CFR 1740 .61(a))

- Generate sufficient revenues to cover expenses
- Have sufficient cash flow to service all debts and obligations as they come due
- Positive ending cash balance on the cash flow statement for each year of the forecast period
- By the end of the forecast period, will meet at least two of the following requirements:
 - Times Interest Earned Ratio (TIER) of 1.2 or greater
 - Debt Service Coverage Ratio (DSCR) of 1.2 or greater
 - Current ratio of 1.2 or greater
- Positive cash flow from operations at the end of the forecast period

Financial Requirements (7 CFR 1740.63)

- 1740.63(a): The Applicant must submit financial information acceptable to the Agency that demonstrates that the Applicant has the financial capacity to fulfill the grant, loan, and loan/grant combination requirements ... and to successfully complete the proposed project
 - Audited Financials
 - Detailed information for all outstanding and contingent obligations
 - Evidence of all funding, other than the RUS award, necessary to support the project...If ...other funds are required for the broadband project in addition to the requested Reconnect funding, evidence must be included identifying the source of funds and when the funds will be available
 - If the additional funding is not clearly identified, the application may not be considered for an award
 - Historical financial statements
 - Pro Forma financial analysis

Audited Financials

- The following entities must submit **unqualified**, **comparative**, **audited financial statements** (7 CFR 1740.63(a))
 - Corporation
 - Commercial Business
 - Limited Liability Company and Limited Liability Partnership
 - Cooperative
 - Mutual Organization
- Consolidated audit of a parent is permissible if the parent fully guarantees the loan, or in the case of a grant, guarantees that construction will be completed as approved or will repay the grant to RUS
 - However, the historical and pro forma financial information must be the applicant's own information provided on a standalone basis
 - If the applicant has more than one parent, then each parent's audits must be submitted, and each parent must fully guarantee the award

Audited Financials – (cont'd.)

- The following entities (non-Federal entities) are subject to 2 CFR 200 and must have a single audit conducted
 - Authority
 - Municipality
 - Public Body
 - Public Power or Utilities District
 - Indian Tribe
 - Tribal Government
 - Higher Education
 - Non-Profit
 - Territory or Possession of the United States
 - State or Local Government
- Non-Federal entities should review 2 CFR 200.501 for additional information
 - All Non-Federal entities that meet this requirement must file with the Federal Audit Clearinghouse (FAC) as specified under 2 CFR 200.512

Audited Financials (cont'd.)

- Audited financials must be from the year prior to application submission
 - If an application is submitted and the most recent year-end audit has not been completed, the applicant can submit the previous unqualified audit that has been completed
- If a qualified audit containing a disclaimer or adverse opinion is submitted, the application will not be considered
- For governmental entities, financial statements must be accompanied with certifications as to unrestricted cash that may be available on a yearly basis to the applicant
- Upload the audited financials under the Project Information tab
- If using an Irrevocable Letter of Credit (ILOC) as grant security, you must still provide an audit



Financial Considerations



Financial Feasibility Considerations

- Entity, not project, must be financially viable.
 - Think about how your PFSAs will affect your revenues
 - Think about your current and future debt service obligations, especially if you're applying for a loan or 50/50 or intend to use a loan as match
- Make reasonable assumptions about services, pricing and subscriber growth
 - Service pricing and subscriber projections have a direct impact on your financials
 - Do your due diligence (research)

Outstanding and Contingent Obligations

- Existing notes
- Loan and security agreements
 - Including RUS loans
- Guarantees
- Any existing management or service agreements
- Any other agreements with parents, subsidiaries and affiliates
 - Including debt instruments that use the applicant's assets, revenues or stock as collateral

Evidence of Other Funding

- Financial feasibility means that all project costs must be covered
- Capital Investment Workbook's PFSA Summary shows whether additional funds are needed to fully fund the project (Network tab)
 - If other funds are required, application must identify the source of funds and when the funds will be available
- If the additional funding is not clearly identified, the application may not be considered for an award
- If applicant proposes expanding its non-telecommunication services and states
 that additional funds are required to support sustainability of overall operations,
 then evidence must be submitted supporting the availability of these funds or the
 application may not be considered for funding

Evidence of Other Funding (cont.)

- Bank account statements
 - Internally generated funds used for a cash substitution or to cover other costs
- Firm letters of commitment from equity participants
 - Equity partners not specifically identified by name will not be considered in the financial analysis of the application
- Outside loans
 - Must provide evidence of timely availability of funds
- NOTE: All other funds must be deposited into an awardee's operating accounts at award closing

Evidence of Other Funding – Match

- All matching funds must be deposited into the <u>applicant's operating accounts</u>
 - Including third-party loan funds
- Awardees will be permitted to deposit the required matching and other required funds into the Pledged Deposit Account on a rolling basis (see the award documents for specifics)
- Application must clearly identify source(s) of match and provide supporting documentation in the application
 - Including if the source is the applicant's operating accounts
 - Third party match requires a commitment letter from third party indicating that the funds will be available at award closing

Evidence of Other Funding – Match (cont.)

- If using a loan as a source of match
- Submit loan documentation in the ReConnect application that indicates:
 - Loan terms and conditions
 - ReConnect loan-funded assets will not be used as collateral for the loan
- The loan must be entered into and funds transferred into the applicant's accounts by award closing

Evidence of Other Funding – Federal Broadband Programs

- RUS is aware that applicants might apply to serve areas under consideration for or receiving funding from other Federal high-speed internet programs
 - Federal Communications Commission Rural Digital Opportunity Fund (RDOF)
 - National Telecommunications and Information Administration various programs
 - Treasury funds to states that will re-grant them at the local level
- USDA, NTIA, FCC, and Treasury have a data-sharing Memorandum of Understanding (MOU)

Historical Financial Information

- Historical financial statements for the last four years
 - If applicant has been operating for less than four years, historical statements for the time the applicant has been operating are acceptable
- Application system has sections for historical financial statements and the data that flows into them:
 - Balance sheet
 - Income statement
 - Cash flow statement
- Historical and pro forma financial information must be the applicant's own information provided on a standalone basis
 - o If a subsidiary is applying it must use its own financials, not the parent company's

Pro-Forma Financial Analysis

- Bridge year plus the following five years
- Application system has sections for pro-forma financial statements, the data that flows into them and the required financial ratios:
 - Balance sheet
 - Income statement
 - Cash flow statement
- Annual financial projections
- Supporting assumptions
- Depreciation schedule for existing facilities, those facilities funded with federal assistance, matching funds, and other funds.
- Indicate committed sources of capital funding

Pro-Forma Financial Analysis (cont.)

- Financial ratios by the end of the 5-year forecast period, meet two of these:
 - Times Interest Earned Ratio TIER of at least 1.2
 - Debt Service Coverage Ratio (DSCR) of at least 1.2
 - Current Ratio of at least 1.2
- The project must show positive cash flow from operations at the end of the forecast period
- Historical and pro forma financial information must be the applicant's own information provided on a standalone basis
 - If a subsidiary is applying it must use its own financials, not the parent company's

Loan Information

- Service obligation: provide broadband service through the amortization period of the loan
- Amortization period (repayment term): composite economic life of project assets plus 3 years for both funding types (100% loan and 50/50 loan)
- Interest rates:
 - 100% loan: 2%
 - Loan portion of 50/50: equal to Treasury rate for obligations of comparable maturity (determined at time of loan advance)
- Deferral (principal and interest): 3 years for both loan funding types

Loan Security

- Applies to 100% loan and loan portion of 50/50 loan/grant combination
- Corporations and LLCs/LLPs:
 - o RUS requires exclusive first lien on all assets of the entity including on all revenues
 - RUS may share its first lien position with one or more lenders on a pari passu basis
 - You may propose other forms of collateral; see 7 CFR 1740.44(c)(1) for details
 - Certify that prior lenders/lienholders on any Awardee assets have agreed to sign the RUS' standard intercreditor agreement or co-mortgage
- Tribal entities and municipalities: RUS will develop appropriate security arrangements
- All property and facilities purchased with award funds must be owned by the Awardee

Grant Information and Security

- Service obligation: provide broadband service through the composite economic life of the award-funded facilities
- RUS requires exclusive first lien on all grant-funded assets during the service obligation
 - Thereafter, any sale or disposition of grant assets must comply with 2 CFR part 200, regardless of the type of organization awarded ReConnect grant funds
- The awardee must repay the grant if the project is sold or transferred without receiving written approval from RUS during the service obligation of the grant
- All property and facilities purchased with award funds must be owned by the Awardee

Other Security Arrangements – Publicly Traded Companies

- Publicly traded companies with a bond rating of Investment Grade may provide evidence of the rating to remove the following requirements from their applications:
- Financial projections
- Submit the maps for NFSAs
- NOTE: Evidence of the bond rating doesn't remove all items under financial tab of the application
- No NFSA maps means no NFSA data is required in the Capital Investment Workbook

Other Security Arrangements – Irrevocable Letter of Credit (ILOC)

- 100% grant applicants may propose to substitute an ILOC for standard grant security arrangements
 - Must be for the full amount of funding requested
 - Must remain in place until project completion
- Removes the following requirements from the 100% grant application
 - Financial projections
 - Financial ratio tests
 - Submit the maps for NFSAs
- NOTE: ILOC doesn't remove all items under Financials tab of the application
- No NFSA maps means no NFSA data is required in the Capital Investment Workbook



ReConnect Program

Financial Overview Live Demo





Application Interdependencies



Financial Information Comes From...

- Starting An Application
- Project Information
- Service Area(s)
- Network
- Early sections under the Financials tab

Starting An Application – Financial Questions

- Is the applicant a publicly traded company?
- Is the applicant replacing the standard grant security arrangements with an ILOC?*
- Has the applicant received a AAA bond rating from either Fitch, Standard and Poor's or Moody's for the previous
 year from the date the application is submitted?*
- Can the applicant demonstrate a current ratio of 2 or higher, TIER of 2 or higher, a debt service coverage ratio of 2 or higher, and a Net Worth of 45% or more for the previous two years from the date the application will be submitted?
- Can the applicant guarantee that the proposed project will be constructed? The applicant will be required to submit audited financials to demonstrate the ability to complete this project.*
- You cannot change your answer later to these questions, you must start a new application.

Project Information

- Is the applicant planning on investing any funds to construct broadband facilities in the NFSA during the 5-year forecast period?
- Non-Funded Service Area (NFSA): Any area in which the applicant offers broadband service or intends to offer service during the forecast period but is not a part of its PFSA.
- Determines the amount of service offering and subscriber data required (Financials)
 - Definition: any area in which the applicant offers broadband service or intends to offer broadband service during the forecast period but is not a part of its proposed funded service area
- Changing answers to NFSA questions later means revisiting the CIW and Financials tab to add data, save pages or both.

Service Areas

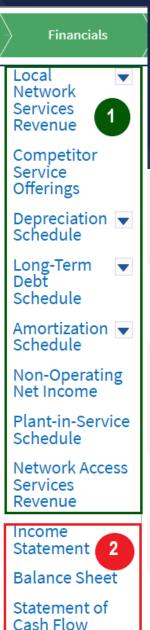
- PFSAs and NFSAs feed into the Local Network Service Area section of the Financials tab
 - Service Offerings
 - Subscriber Projections
 - Household numbers from the demographic data on the map contributes to churn rate calculation
 - Competitor Service Offerings

Network

- Capital Investment Workbook (CIW) costs, timing should be reflected in pro forma financials
 - Ex.: Large asset purchase in year 2 should be sure reflected in pro forma financials reflect at correct time on correct line items
- Data flows from CIW to:
 - Composite Economic Life: determines service obligation and loan repayment periods
 - Depreciation Schedule
- Data flows from Capital Investment Schedule (CIS) to:
 - Depreciation Schedule
 - Plant-In-Service Schedule
- Subscriber projections in Financials tab should be consistent with CIS data

Financials Tab – Early Sections

- Historical financials and pro-forma analysis rely on data from every section that precedes the financial statements (1)
- Financial statements (2) will not contain the correct data if early sections are not completed first
- Amortization tables will not contain the correct data if Long-Term Debt section is incomplete



Financial Documents



Financials Tab: Application System

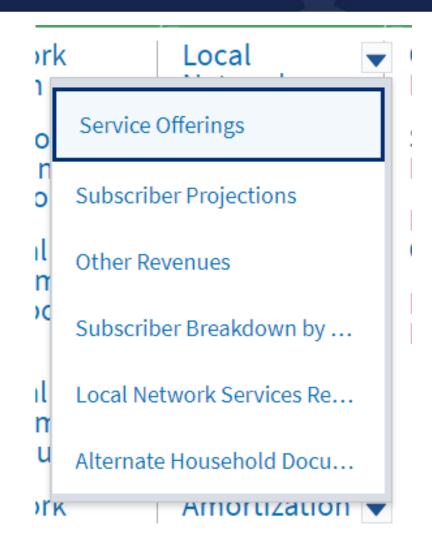


Financials Tab Menu



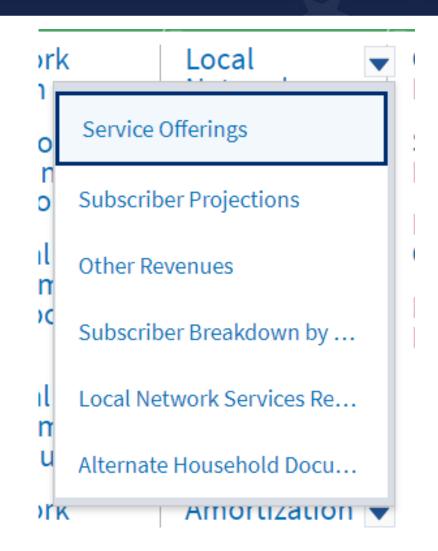
Local Network Services Revenue (LNSR)

- Service Offerings: Data entry for every type of service you offer in existing areas or plan to offer in new areas (PFSAs and NFSAs)
- Subscriber Projections: Data entry for subscribers added and lost, by year, for each service area (PFSAs and NFSAs) and every Service Offering
- Other Revenues: Describe any other service revenues and provide annual amounts



Local Network Services Revenue (LNSR) (cont.)

- Subscriber Breakdown by Service Area:
 System calculates churn rates using your data and displays them here
 - Use the Alternate Household Data toggle to activate additional data entry if you believe the household numbers don't conform with your own data
- Local Network Services Revenue: Systemgenerated summary of all LNSR data you provided
- Alternate Household Documents: only required if you provide Alternate Household Data on the Subscriber Breakdown



Competitor Service Offerings

- Same data as LNSR data entry of price, speeds, customer type, description + competitor name for every competitive offering in each of the application's service areas
- If no competitors, skip this section
- Do your due diligence
 - If RUS discovers competitors that you didn't identify, it could affect the financial feasibility of your project
 - Unidentified competitors could affect your subscriber projections which drive your project revenue

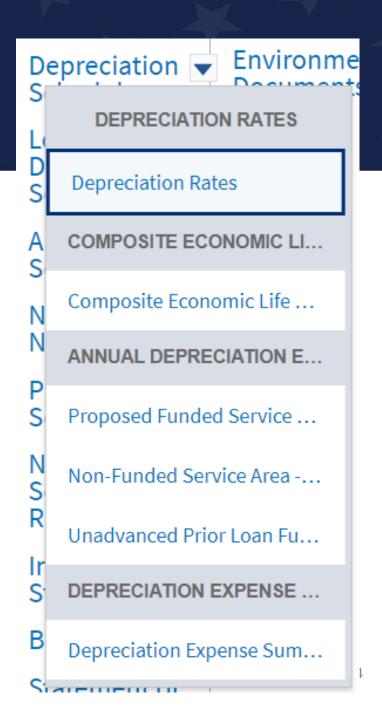
Depreciation Schedule

- Depreciation Rates: Enter the depreciation rates for all asset types (derived from CIW and CIS)
 - Rates for professional services should correspond to the rate used for the service's asset type
 - Explain deviations from published guidance in the Depreciation Expense line item of the Income Statement and in supporting documents
- Composite Economic Life (CEL): System calculates the CEL based on data you previously entered; used in determining loan term and amortization



Depreciation Schedule (cont.)

- Annual Depreciation Expense: System calculates based on data you previously entered
 - If no NFSA, those portions of Annual
 Depreciation Expense will be inaccessible
- Depreciation Expense Summary Enter data for:
 - Existing Plant, Property, and Equipment
 - Non-telecommunications plant planned to be added during the forecast period
 - Less Grant Funded Plant line Application guide provides information on this line item



This is the end of the Financial section for.....

- 100% Grant applicants using an Irrevocable Letter of Credit (ILOC).
- Publicly-traded companies with an Investment Grade bond rating.
- Applicants that can demonstrate a current ratio of 2 or higher, TIER of 2 or higher, a debt service coverage ratio of 2 or higher, and a Net Worth of 45% or more for the previous two years from the date the application will be submitted.

Long-Term Debt Schedule

- Each page contains data entry fields for similar types of information:
 - o Loan ID
 - Lender/RUS program (if RUS funded)
 - o Principal
 - Interest Rate
 - o Term
 - Outstanding Balance
- Use the Documents page to upload the notes, leases, etc. that support your debt entries

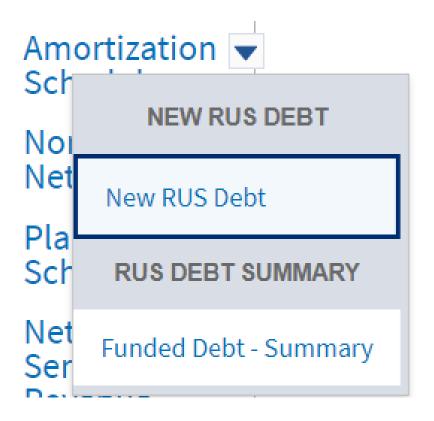


Long-Term Debt Schedule (cont.)

- Funded Debt Existing RUS/RTB/FFB Notes: all existing RUS notes, including all Telecom and Electric loans
- Funded Debt Other: All non-RUS, -RTB, and -FFB debt, that are fixed-maturity borrowings funded by interest payments. Examples include CoBank, ACB and Rural Telephone Finance Cooperative (RTFC) debt, similar debt from other third-party institutions
- Funded Debt Rural Development: Any debt from USDA RD that is not from RUS
- Other Long-Term Debt: All long-term debt not covered in previous long-term debt items. Distinguished from Funded Debt – Other in that it may not have all characteristics of funded debt, like regularly scheduled principal, interest payments
- Obligations Under Capital Lease: Agreement where lessor has agreed that ownership of asset will transfer to lessee when lease period ends. Lessee can then claim finance and depreciation charges. Can be used for property as well as assets

Amortization Schedule

- 100% Grant applicants using ILOC, publicly-traded companies with Investment Grade bond rating do not have to complete this portion
- New RUS Debt: available if requesting 100% Loan or 50/50
 - Enter interest rate and estimated date of first disbursement to calculate amortization table
- Funded Debt Summary: all other RUS Debt that you listed (system generated)



Non-Operating Net Income

- 100% Grant applicants using ILOC, publicly-traded companies with Investment Grade bond rating do not have to complete this portion
- All other income and expenses arising from non-broadband operations
 - Enter a descriptive assumption for each item
 - System nets out the total
- Examples:
 - Gains or losses on sale of equipment
 - Capital gains

Plant-In-Service

- 100% Grant applicants using ILOC, publicly-traded companies with Investment Grade bond rating do not have to complete this portion
- System calculates plant in service and PFSA and NFSA additions to telecommunications plant
 - Enter the bridge year telecommunications plant in service, beginning of year
 - Enter data for these items, as applicable, across all of the pro forma years:
 - Non-Telecommunications Plant Additions
 - Plant Retirements
 - Grant-Funded Expenses
 - Grant-Funded Assets: only used by Cooperatives using Contribution in Aid of Construction Method
 - System calculates end-of-year balances

Network Access Services Revenue

- 100% Grant applicants using ILOC, publicly-traded companies with Investment Grade bond rating do not have to complete this portion
- Generally, only used by entities already providing telecommunications services
- If your organization has this type of revenue, supply historical, bridge and proforma annual amounts
- Be sure to consult the application guide if your organization has Rural Digital
 Opportunity Funds (RDOF) –supporting documentation for this type of revenue
 is required

Network Access Services Revenue Types

- Carrier Interstate Switched Access Charges
- Carrier Intrastate Switched Access Charges
- End User Federal Access Recovery Charges
- End User Federal Broadband Only Loop Charges
- End User Federal Subscriber Line Charges
- End User State Subscriber Line Charges
- Federal USF Alaska Plan Support

- Federal USF Auction Support
 (RBE, CAF II, RDOF)
- Federal USF Connect
 America Fund Broadband
 Support (formerly ICLS)
- Federal USF Connect
 America Fund Intercarrier
 Compensation Support
- Federal USF Frozen High Cost Support
- Federal USF High Cost Loop
 Support

- Federal USF Model Based High Cost Support (CAM, A-CAM, REVISED A-CAM)
- Interstate Special Access
 Charges (aka Business Data Services Charges)
- Intrastate Special Access Charges
- Other Network Access Services Revenue
- State Universal Service Support

Income Statement

- 100% Grant applicants using ILOC, publicly-traded companies with Investment Grade bond rating do not have to complete this portion
- Combination of data pulled from elsewhere in the application and user-entered data
- Every line has a tooltip providing a definition of the type of revenue or expense should be recorded
- Consult the tooltips and Application Guide for specifics on what data to enter
- System will calculate net totals

Income Statement (cont.)

- Assumptions: Required for any user input greater than or less than 0 for the Forecast Years
 - Assumptions are encouraged for all fields when appropriate. For example, financial losses in historical years should be fully explained
- Click SAVE throughout your work in this section at any time.
 - If some data is missing, a pop-up window appears listing all items that must be entered or corrected prior to the submission of the Application
- If any changes are made on previous sections of the application, return to the Income Statement, review the table, and SAVE again
- NOTE: Review the calculated financial ratios at the bottom of the Income Statement as a minimum TIER of 1.2 and a minimum DSCR of 1.2 may be required

Balance Sheet

- 100% Grant applicants using ILOC, publicly-traded companies with Investment Grade bond rating do not have to complete this portion
- Combination of data pulled from elsewhere in the application and user-entered data
 - Bridge and forecast year data carries over from relevant sections of Financials
- Every line has a tooltip providing a definition of the type of information that should be recorded
- Consult the tooltips and Application Guide for specifics on what data to enter
- System will calculate net totals

Balance Sheet (cont.)

- Assumptions: Required for any user input greater than or less than 0 for the Forecast Years
 - Assumptions are encouraged for all fields when appropriate
- Click SAVE throughout your work in this section at any time.
 - If some data is missing, a pop-up window appears listing all items that must be entered or corrected prior to the submission of the Application
- If any changes are made on previous sections of the application, return to the Balance Sheet, review the table, and SAVE again
- NOTE: Review the calculated financial ratios at the bottom of the Income Statement as a minimum Current Ratio of 1.2 may be required

Statement of Cash Flow

- 100% Grant applicants using ILOC, publicly-traded companies with Investment Grade bond rating do not have to complete this portion
- Most of line items are automatically generated as a result of changes to the Balance Sheet and Income Statement
 - Where the line items do not reflect all cash transactions, manually enter amounts for additional line items using the Add Line Item button in each section of the Statement
- Every line has a tooltip providing a definition of the type of information that should be recorded
- Consult the tooltips and Application Guide for specifics on what data to enter
 - See the table that explains all of the calculations that contribute to the Statement of Cash Flow
- System will calculate net totals

Statement of Cash Flow (cont.)

- Assumptions: Required for any user input greater than or less than 0 for the Forecast Years
- Click SAVE throughout your work in this section at any time.
 - If some of data is missing, a pop-up window appears listing all items that must be entered or corrected prior to the submission of the Application
- If any changes are made on previous sections of the application, return to the Statement of Cash Flow, review the table, and SAVE again

Statement of Cash Flow (cont.)

- **IMPORTANT:** Validate the ending cash balance for each fiscal year, as it must correspond with the cash balance in the Balance Sheet for the same year
 - "Ending Cash" on the Statement of Cash Flow should equal the total of "Cash & Equivalents" plus "Cash-RUS Construction Fund" from the Balance Sheet for the corresponding period
- REMINDER: Check the cash flow statement to ensure positive cash flow from operations for Year 5 on the "Net Cash Provided/(Used) by Operations" line and make sure of a positive ending cash balance for each forecast year



Financial Documents





Wrap-Up





ReConnect Resources



Available Resources for Application Help

Technical Assistance

- Register for upcoming workshops/webinars https://www.usda.gov/reconnect/events
- Subscribe to receive updates about upcoming events on the ReConnect website

Resources

- ReConnect website https://www.usda.gov/reconnect
- NOFO: https://federalregister.gov/d/2024-03484
- Regulation: https://www.ecfr.gov/current/title-7/subtitle-B/chapter-XVII/part-1740
- Updated Application Guide https://www.usda.gov/reconnect
- Updated Frequently Asked Questions https://www.usda.gov/reconnect

Contact Us

- When working inside the application, use the "contact us" button on your screen.
 Outside of the application system, use https://www.usda.gov/reconnect/contact-us
- Contact your General Field Representative (GFR): https://www.rd.usda.gov/contact-us/telecom-gfr/all







Environmental Requirements Overview

USDA RUS ReConnect Program



Agenda

- Environmental Review and Clearance Process. Section 106 Review
 - Presented by Anthony High, Environmental Protection Specialist, Rural Utilities Service (RUS) Telecommunications Policy and Outreach Division Engineering Branch (PODEB)

· Q&A



Environmental Review and Clearance Process



What is the Environmental Review Process?

 The environmental review process under the National Environmental Policy Act (NEPA) is a way of evaluating the environmental impacts of federal actions and identifying ways of meeting the need.



Plowing Method of Installation



Plowing along a roadside

National Environmental Policy Act of 1969

- NEPA requires RUS and other federal agencies to consider the environmental impact of proposed actions early in the planning process and decision-making process
- This process is designed to encourage public participation
- Documents must be available to the public



Directional Boring Machine

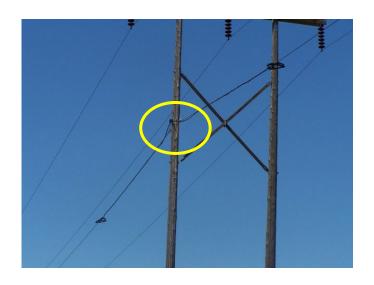
Examples of Special Purpose Laws

- Statutes
 - Endangered Species Act (ESA)
 - National Historic Preservation Act (NHPA)
 - Magnuson-Stevens Act (MSA)
 - Clean Water Act (CWA)
 - Clean Air Act (CAA)
 - Wild and Scenic Rivers Act (WSRA)
 - Safe Drinking Water Act (SDWA)
 - Resource Conservation and Recovery Act (RCRA)
- Executive Orders
 - Floodplain Management
 - Wetland Protection
 - Environmental Justice (EJ)

RUS's Environmental Regulations

• 7 CFR Part 1970 – RUS Environmental Policies and Procedures

https://www.ecfr.gov/current/title-7/subtitle-B/chapter-XVIII/subchapter-H/part-1970



Fiber optic cable anchored by a strong cable and attached to an empty area on an existing utility pole



Cable placement on an existing pole along a stabilizing cable.

RUS Telecommunications Responsibilities

- Responsible for all environmental review decisions and findings related to its actions
- Encourage awardees to design proposals to protect, restore, and enhance the environment
- Outline types of information and analyses required in guidance documents when awardees are required to submit environmental information
- Ensure mitigation measures described in environmental review and decision documents are included as conditions of financial assistance

Awardee Responsibilities

- Consult with RUS staff to determine the appropriate level of environmental review
- Contact state and Federal agencies to initiate consultation
- Provide information to RUS necessary to evaluate the proposal's potential environmental impacts and alternatives.
- Provide any additional studies, data, and document revisions requested by RUS during the environmental review and decision-making process.
 - Examples of studies/data that RUS may require includes Official Species Lists, Special Status Plant and Wildlife Species Table, and biological assessments or surveys for ESA, cultural surveys for NHPA, Essential Fish Habitat Assessments for MSA, and consistency determinations for Coastal Zone Management Act (CZMA) compliance

Awardee Responsibilities continued

- Ensure that no actions are taken (such as any demolition, land clearing, or initiation of construction) with respect to their proposal, that may have an adverse impact on the quality of the human environment or that may limit the choice of reasonable alternatives during the environmental review process.
- Promptly notify RUS when changes are made to their proposal so that the environmental review and documentation may be supplemented or otherwise revised as necessary.
- Incorporate any mitigation measures identified and any required monitoring in the environmental review process into the plans and specifications and construction contracts for the proposals

Levels of Environmental Review

- The environmental review process involves three levels of review:
 - Categorical Exclusion (CE), §1970.53 and §1970.54
 - Environmental Assessment (EA), §1970.101
 - Environmental Impact Statement (EIS), §1970.151
- Most Telecom projects are classified as CEs under NEPA



Handhole in a neighborhood

§ 1970.52 (a) Extraordinary Circumstances

- Extraordinary circumstances are unique situations presented by specific proposals:
 - Characteristics of the geographic area
 - Scientific controversy about the environmental effects
 - Uncertain effects or effects involving unique or unknown risks
 - Unresolved conflicts concerning alternate uses of resources
- In the event of extraordinary circumstances, a normally excluded action will be the subject of an additional environmental review to determine the potential to cause significant adverse environmental effects



Directional Boring in a sensitive area

If extraordinary circumstances are identified, RUS can require an EA or an EIS

Eligibility for a CE

- For a proposal to be eligible for a CE, the following conditions must be ruled out (§ 1970.52):
 - Adverse effect to:
 - Historic properties
 - Federally listed threatened and endangered species /critical habitat, candidate species
 - Wetlands
 - Floodplains
 - Formally classified lands, special sources of water, coastal barriers, coastal zone management areas, and coral reefs
 - When the action will:
 - Result in a violation of a regulation or permit
 - Involve construction/expansion of a RCRA storage or disposal facility
 - Pose the likelihood of uncontrolled/unpermitted pollutants
 - Involve controversy on effect to the environment brought up by a Federal, tribal, state, or local government agency

§1970.53 Categorical Exclusions involving no or minimal disturbance without an Environmental Report (ER)

 These actions normally do not require an awardee to submit environmental documentation with their applications

 However, based on the review of the project elements and description, RUS may request additional environmental documentation from the awardee at any time, specifically if RUS determines that extraordinary circumstances may exist.

- Example of actions classified under §1970.53:
 - Minor amendments to previously approved projects
 - Upgrade/rebuild of existing telecom facilities or addition of aerial cable on existing poles in developed, existing rights-of-way (ROWs)
 - Buried fiber cable in developed, existing ROWs
 - Collocation of telecom equipment on existing infrastructure



Collocation of a cell tower 79

§1970.54 Categorical Exclusions with an Environmental Report (ER)

 These actions require awardees to submit an ER with their application to facilitate RUS determination of extraordinary circumstances

 The ER provides project-specific information including an evaluation of the proposal's potential to impact specific environmental resources and historic properties so that RUS can either complete the required environmental review process or determine if additional impact

analysis may be needed.

- Example of actions classified under §1970.54:
 - New telecom towers less than 450 feet in height
 - New linear telecom facilities and related equipment and infrastructure outside of developed, existing ROWs



New microwave tower

§1970.101 Environmental Assessment (EA)

- EA is a concise public document used by RUS to determine whether to issue a Finding of No Significant Impact (FONSI) or prepare an EIS
 - EAs must be prepared in accordance with RD Instruction 1970-C, Exhibit B Guidance to Applicants for Preparing Environmental Assessments
- An EA must be prepared for all forms of financial assistance unless:
 - Categorically excluded under §1970.53 or §1970.54
 - Required to be subject of an EIS

^{*} Most Telecom projects that require an EA are in Alaska

§1970.151 Environmental Impact Statement (EIS)

- EISs are for EA-level proposals with significant impacts
- Informs decision-makers and the public of the reasonable alternatives to avoid or minimize adverse impacts
- Once authorized by the Agency in writing, applicants are responsible for funding all thirdparty contractors used to prepare the EIS.
- * EISs are not common in the Telecommunications Program

When is the environmental review process formally concluded?

- The environmental review process is formally concluded when RUS:
 - Reviews the appropriate environmental document for completeness
 - Stakeholder consultations completed (i.e., U.S. Fish & Wildlife Service, National Marine Fisheries Service, State Historic Preservations Officers (SHPOs), Tribal Historic Preservation Officers (THPOs), Indian Tribes, U.S. Army Corps of Engineers, and Land Managing Agencies)
 - All required public notices have been published and public comment periods have lapsed;
 public comments received have been considered and properly addressed
 - Executes environmental review decision documents
 - Approves (Exhibit D) for Categorical Exclusion (CE)
 - Issues Finding of No Significant Impact (FONSI) for EA
 - Issues a Record of Decision (ROD) for EIS
 - Environmental review status letter submitted to awardee



Section 106 Review



Section 106 Review

- Do not initiate consultation until directed to by RUS
- Template letters are available
- TDAT (Tribal Directory Assessment Tool): https://egis.hud.gov/TDAT/
- Further Guidance

Proposed Funded Service Area, Route, APE and Research Area

Telecom:

Proposed Funded Service Area (PFSA): The area (whether all or part of an existing or new service area) where an applicant is requesting funds to provide broadband service.

Route: Refers to geographic location for proposed aerial or buried fiber cable to bring broadband service to all premises

Archaeology (Section 106):

Area of Potential Effect (APE): Per 36 CFR 800.16: "APE means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Research Area: The area a Class I (desktop study) will review for their report. Depending on the state and consulting parties this can be from ½ to 5 miles off either side of the APE (usually between ½ to 1 mile).









USDA RUS ReConnect Program



Agenda

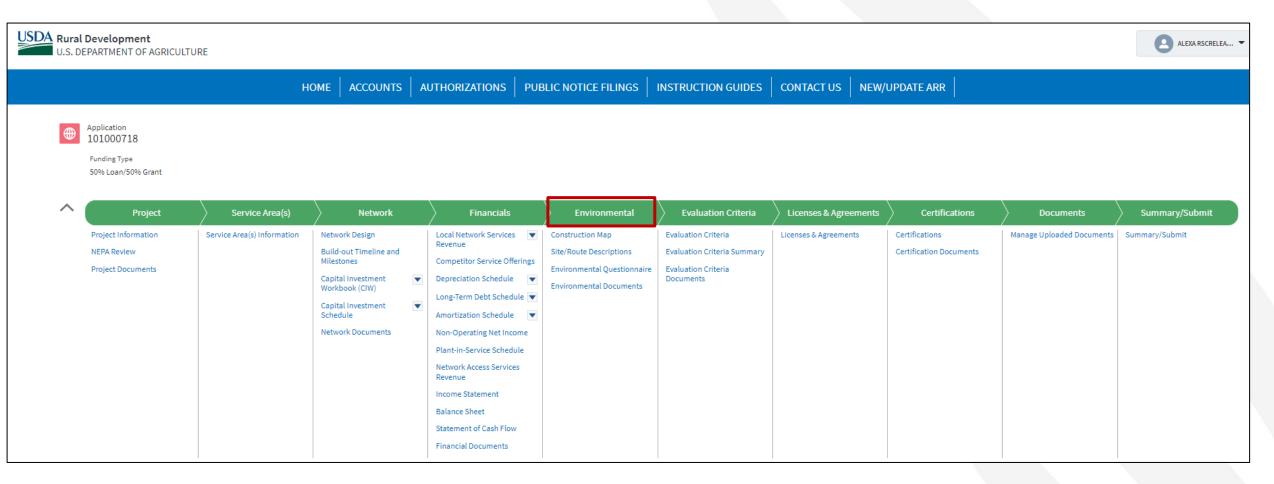
- Environmental Tab Part 1
 - Construction Map



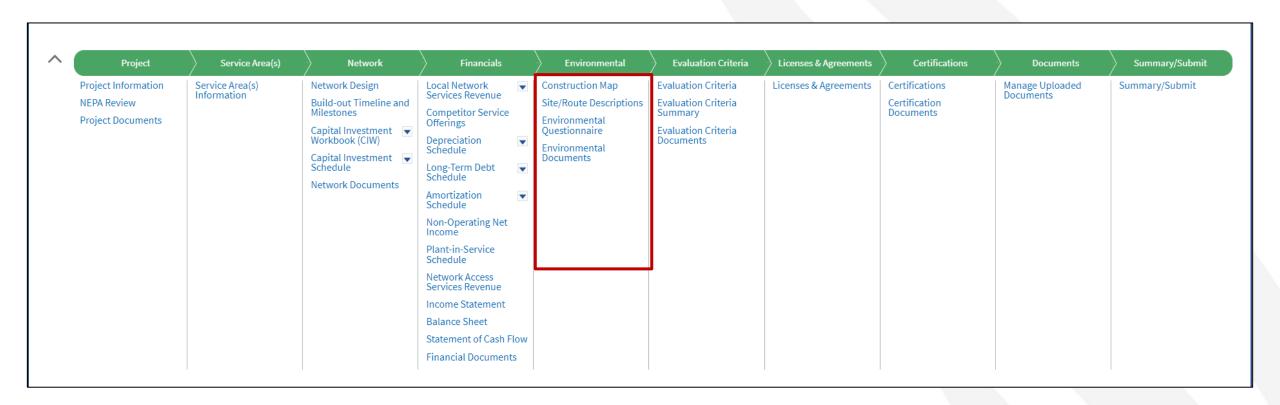
Navigating to the Environmental Tab



Navigating to the Environmental Tab



Navigating to the Environmental Tab (continued)

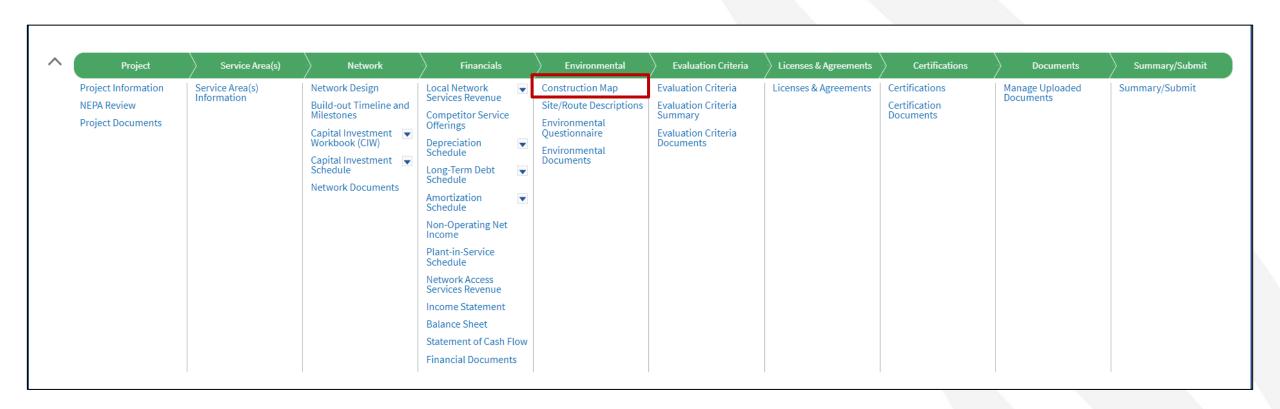




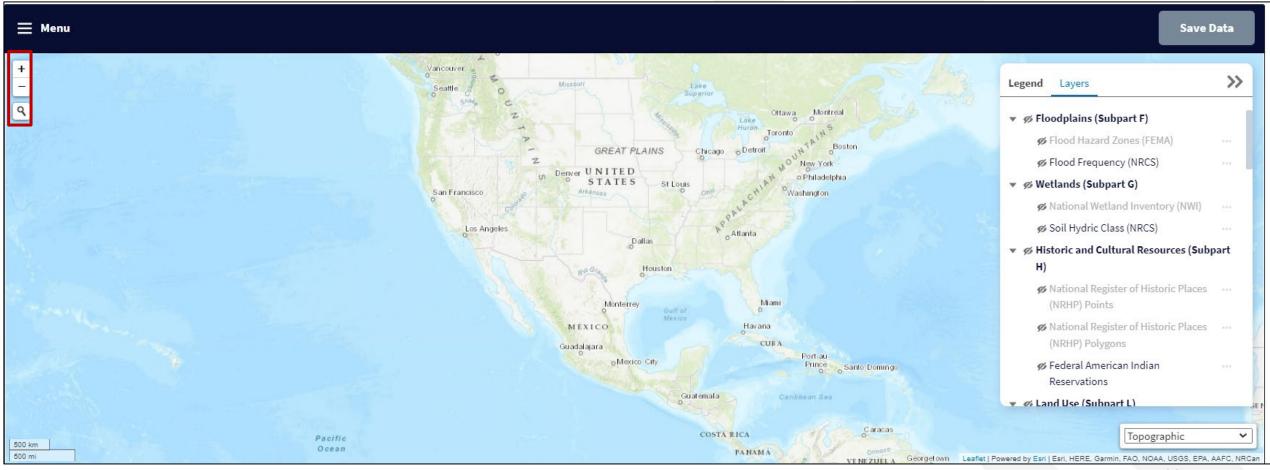
Construction Map



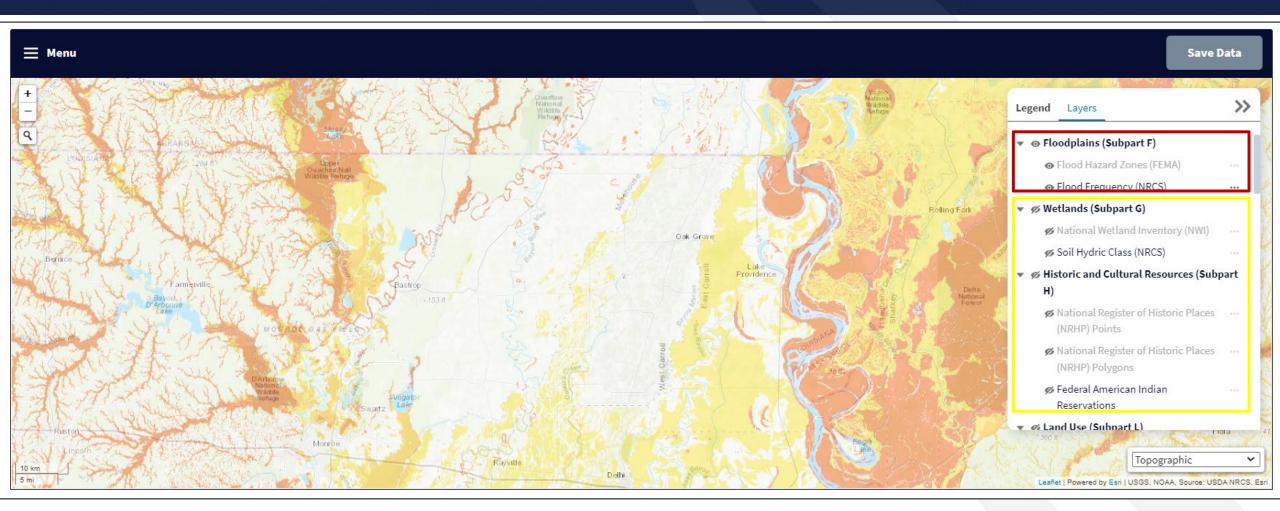
Navigating to Construction Map



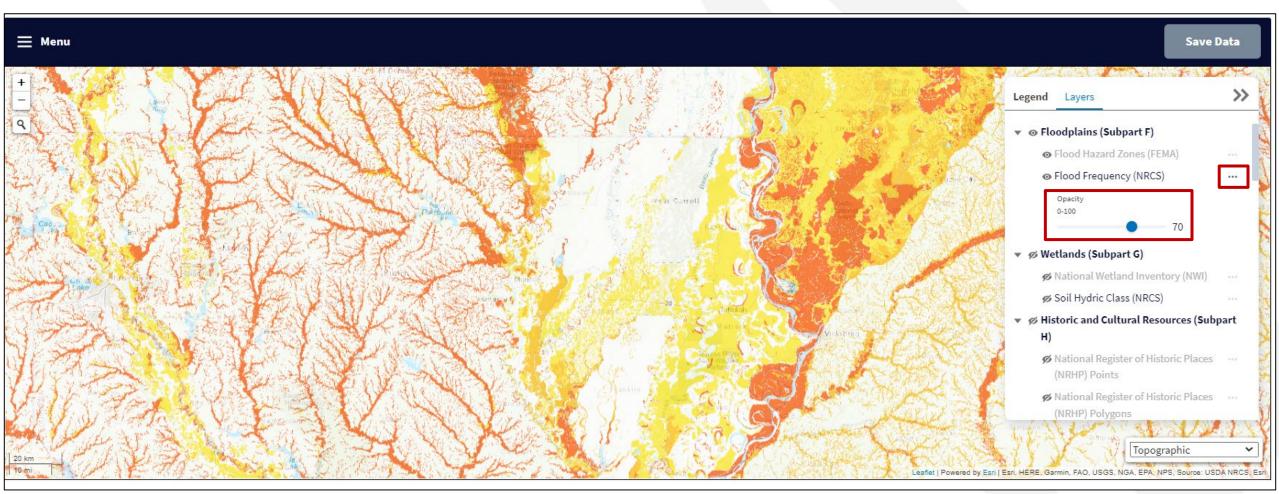
Construction Map



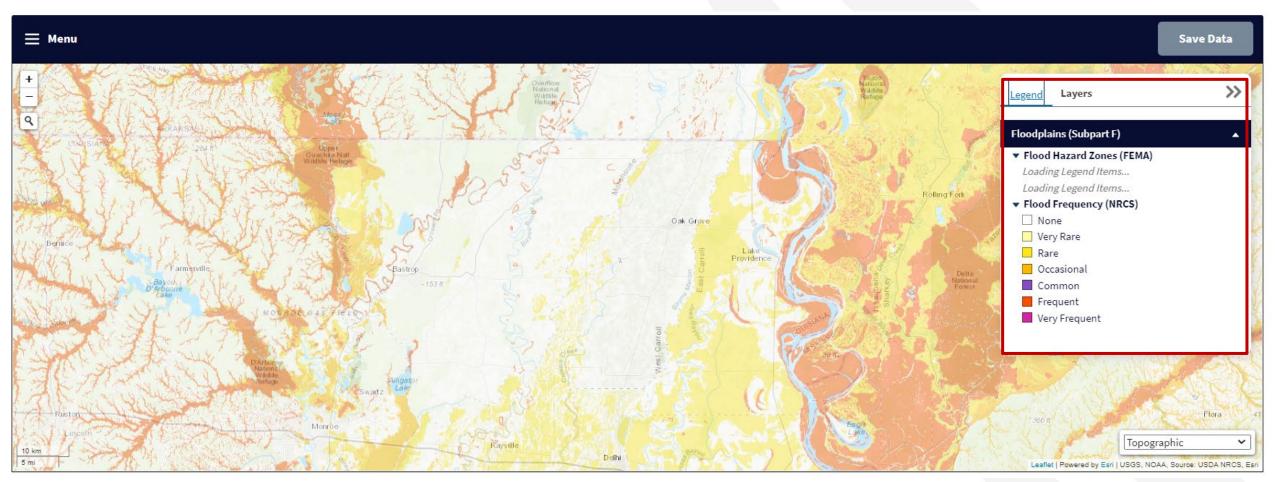
Construction Map – Layers On/Off



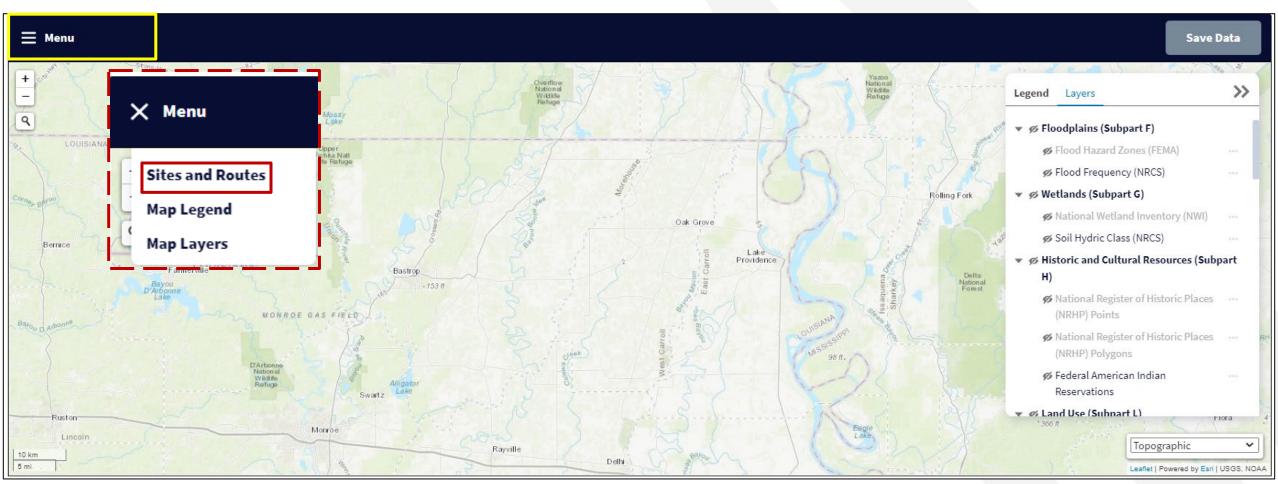
Construction Map – Layer Opacity



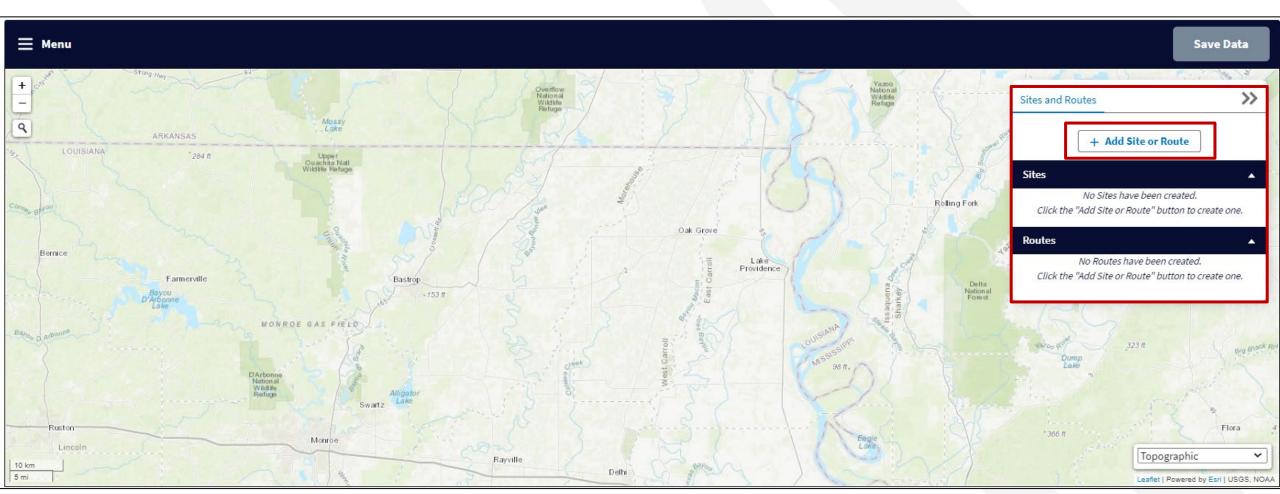
Construction Map Legend



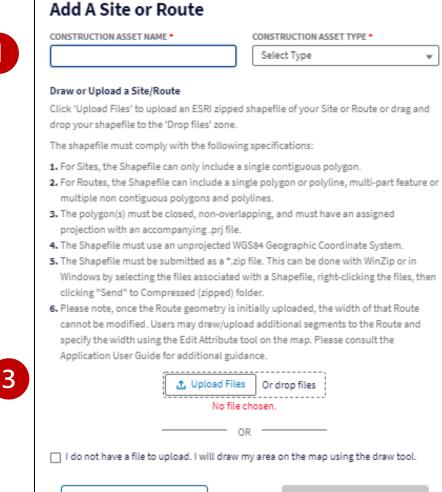
Construction Map – Add Site or Route



Construction Map – Add Site or Route (continued)



Construction Map – Add Site or Route (continued)

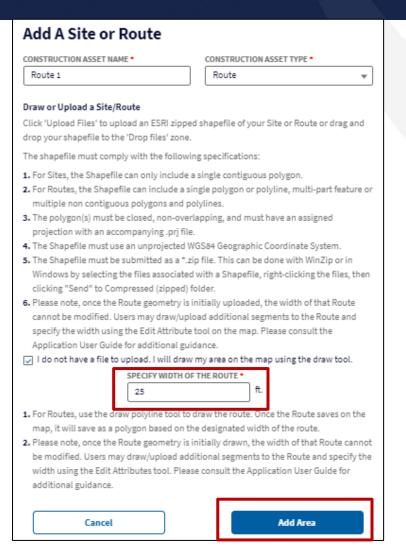


Cancel

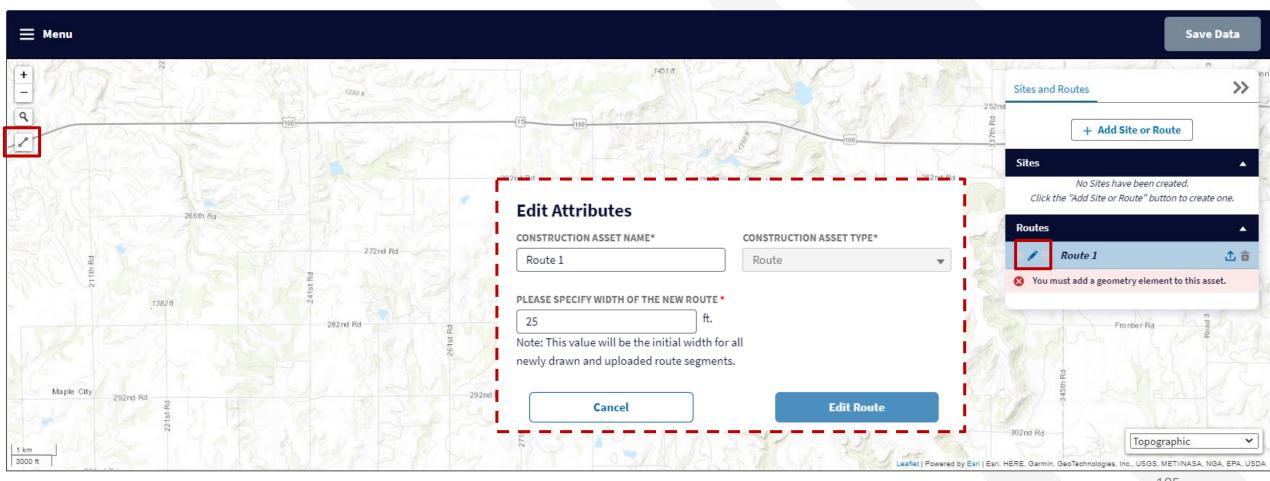


Drawing a Route

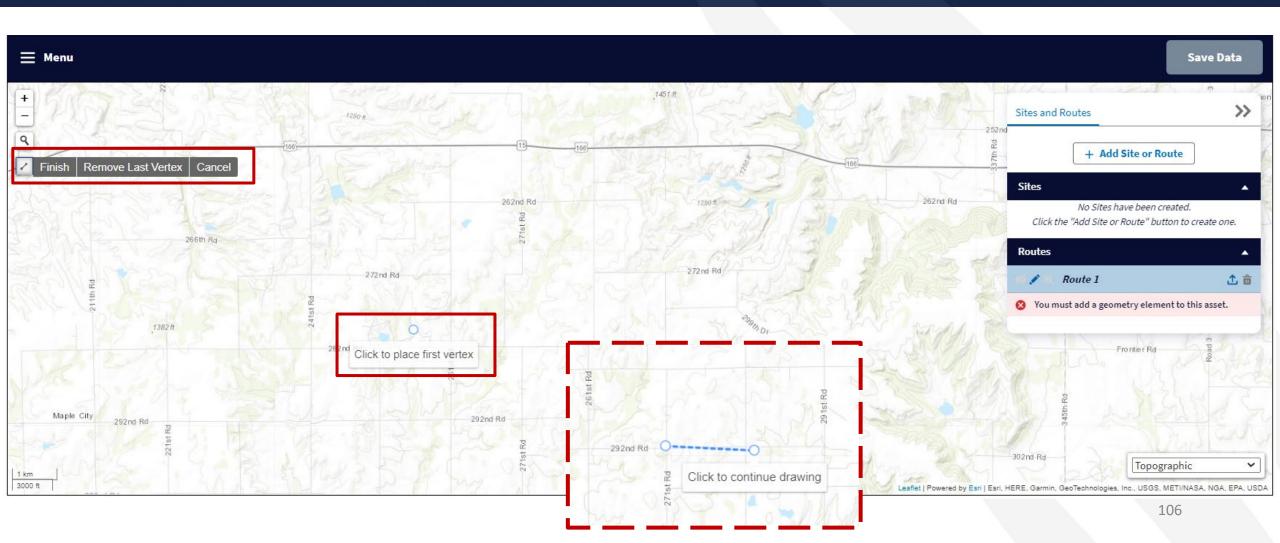
Construction Map – Drawing a Route



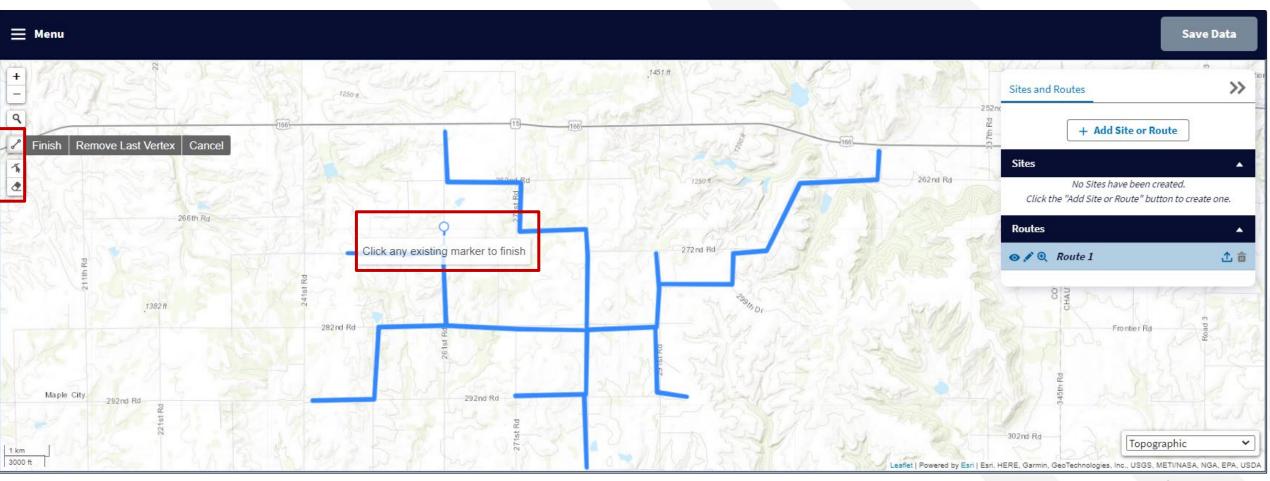
Construction Map – Drawing a Route (continued)



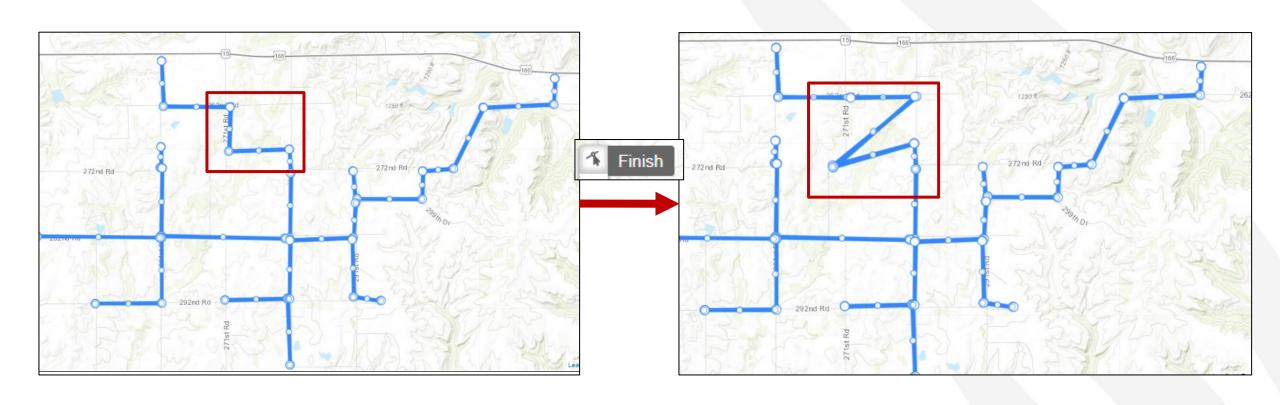
Construction Map – Drawing a Route (continued)



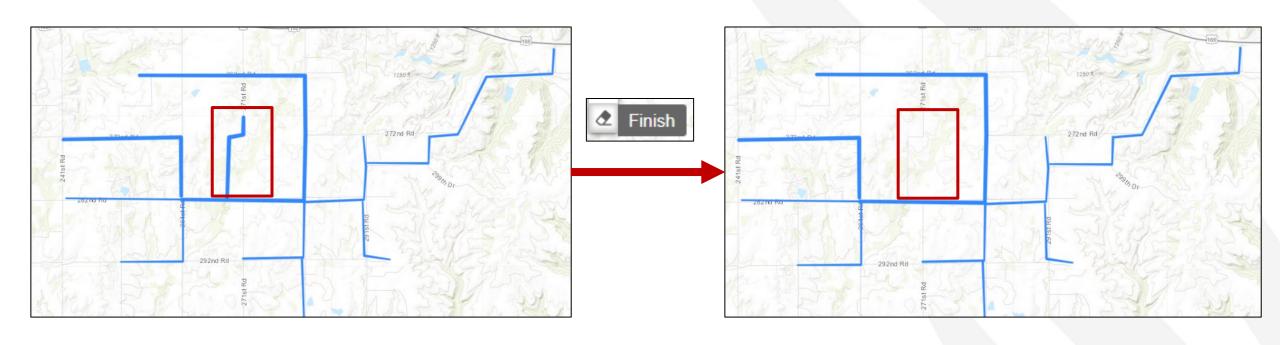
Construction Map – Drawing a Route (continued)



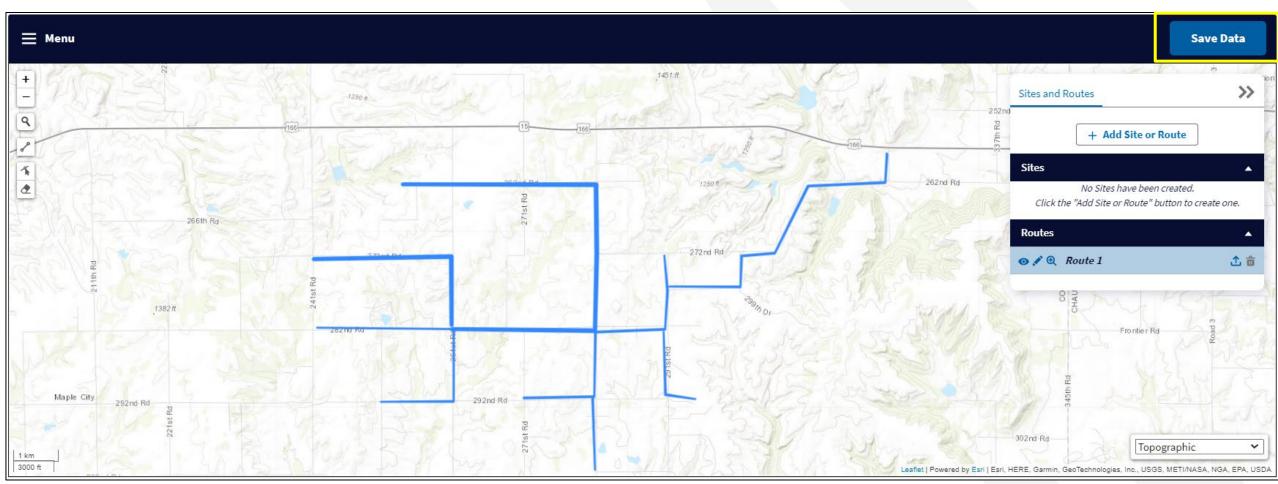
Construction Map – Editing Route Vertices



Construction Map – Removing Route Layers

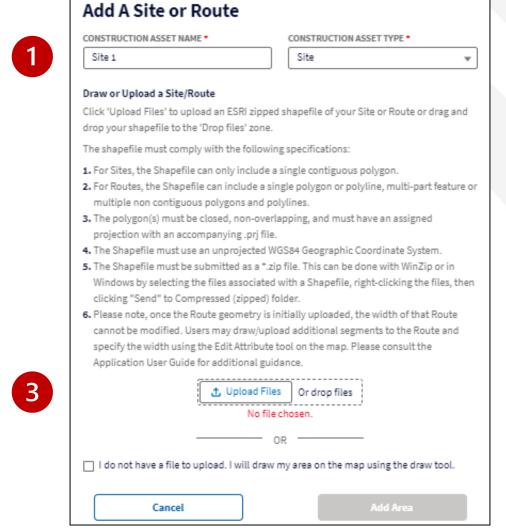


Construction Map – Save Data

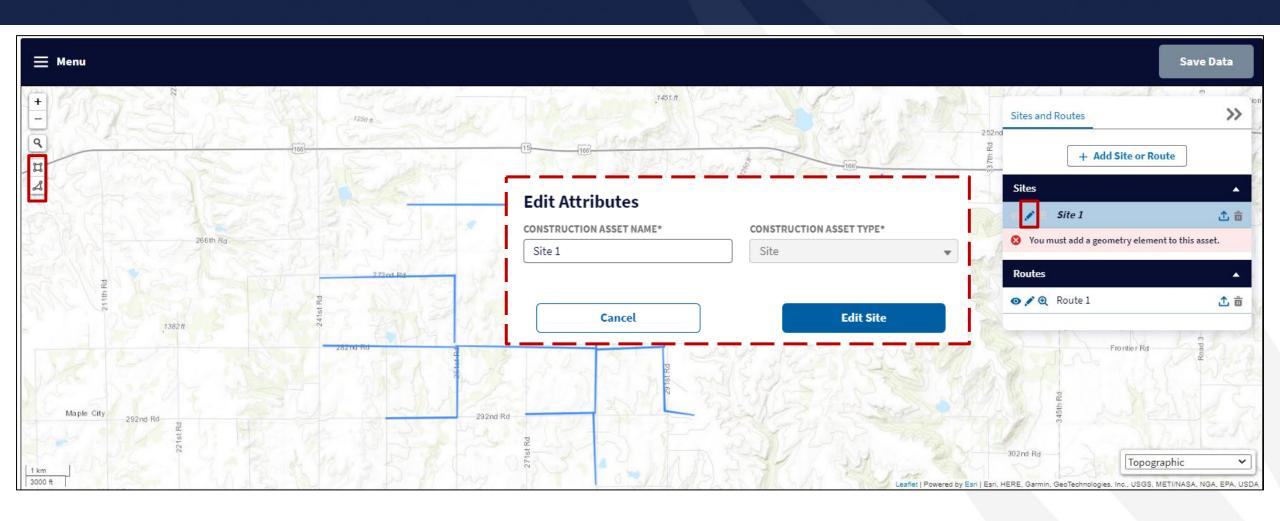


Drawing a Site

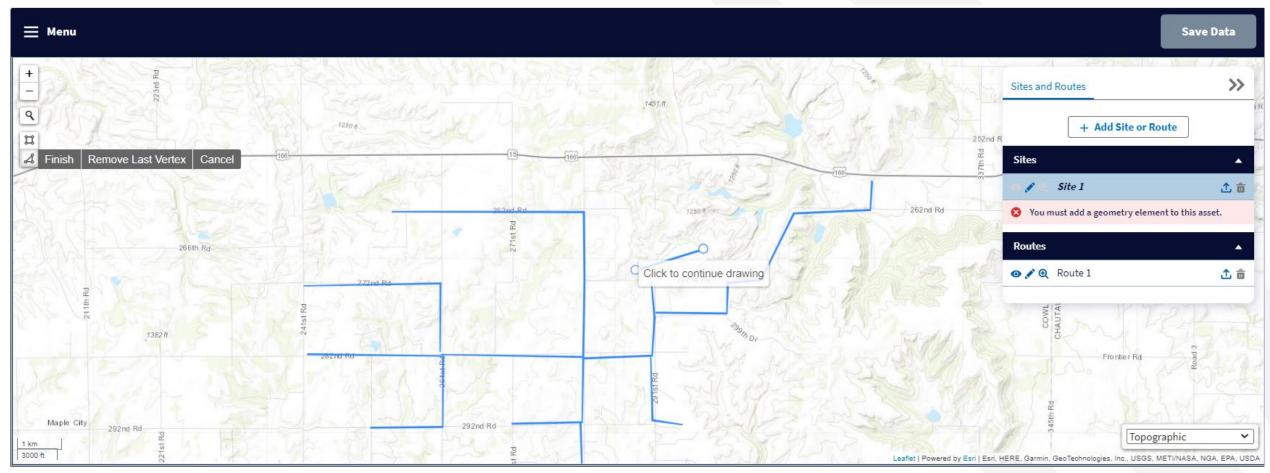
Construction Map – Drawing a Site



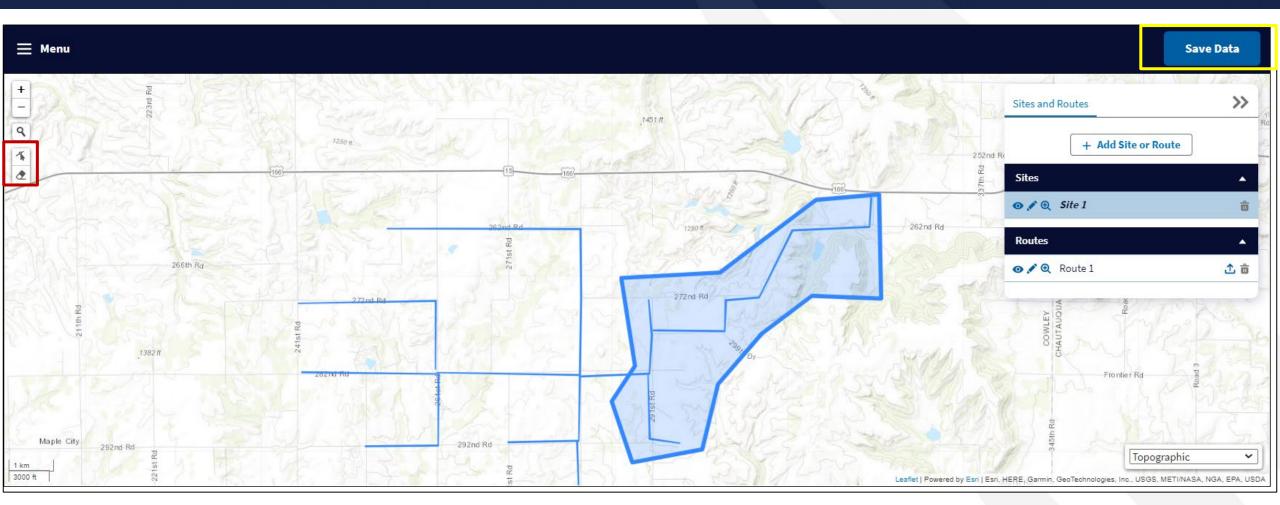
Construction Map – Drawing a Site (continued)



Construction Map – Drawing a Site (continued)



Construction Map – Drawing a Site (continued)



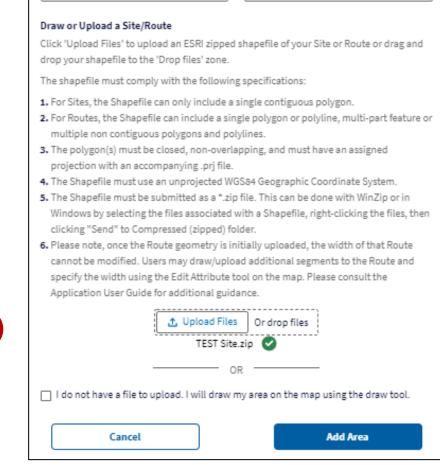
Uploading a Site or Route

Construction Map – Uploading a Site or Route

Add A Site or Route

CONSTRUCTION ASSET NAME *

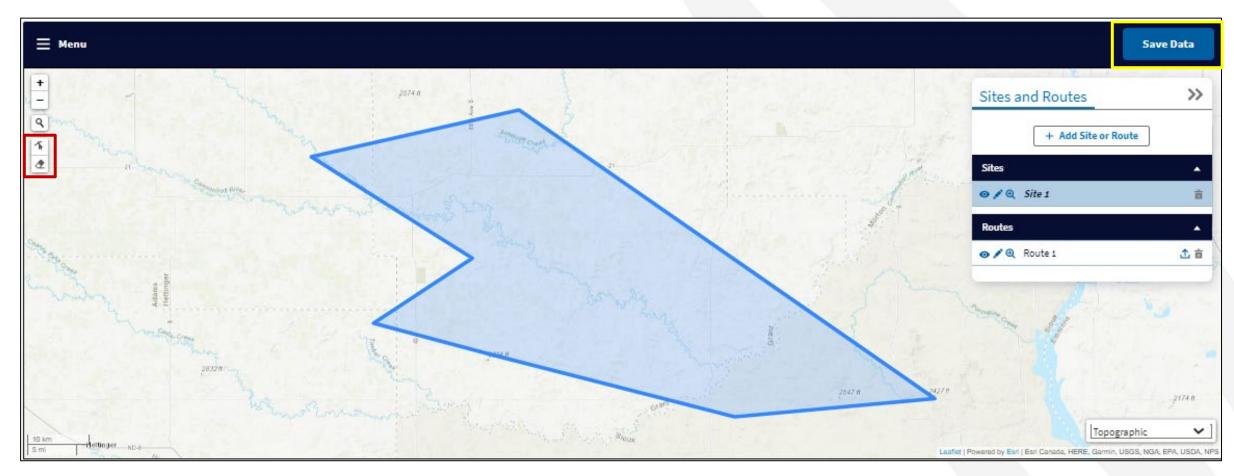
Site 1



CONSTRUCTION ASSET TYPE *

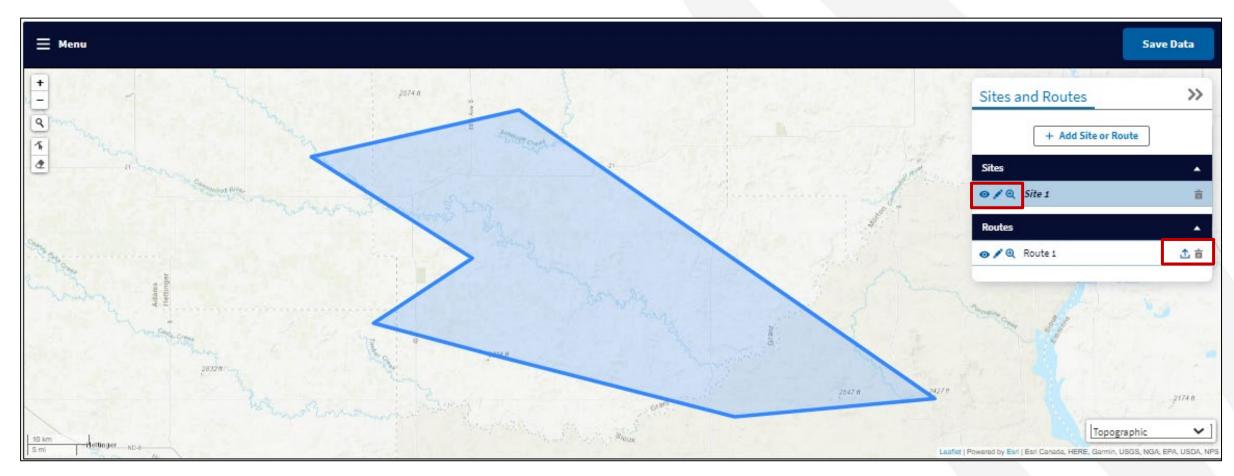
3

Construction Map – Uploading a Site or Route

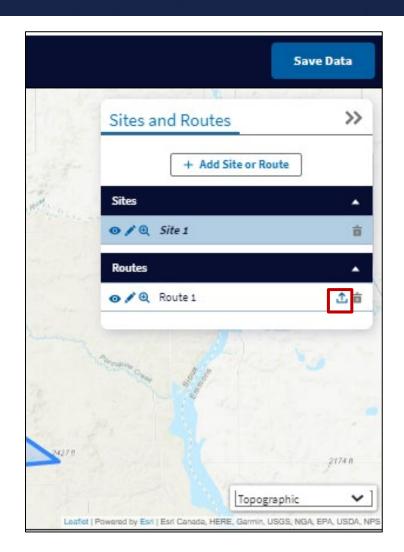


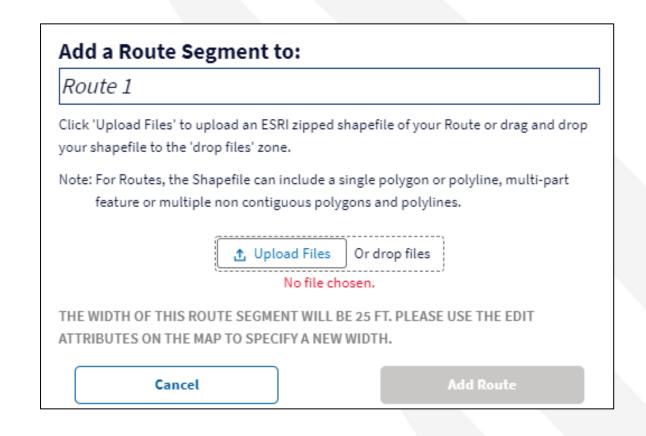
Construction Map – Additional Features

Construction Map – Additional Features



Construction Map – Additional Features (continued)











ReConnect Application: Environmental Part 2

USDA RUS ReConnect Program



Agenda

- Environmental Tab Part 2
 - Site and Route Descriptions
 - Environmental Questionnaires
 - Environmental Documents



Site/Route Descriptions



Navigating to Site and Route Descriptions



Site and Route Descriptions

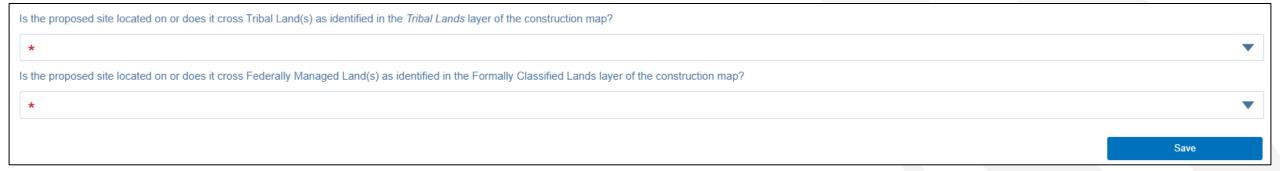


Site Descriptions

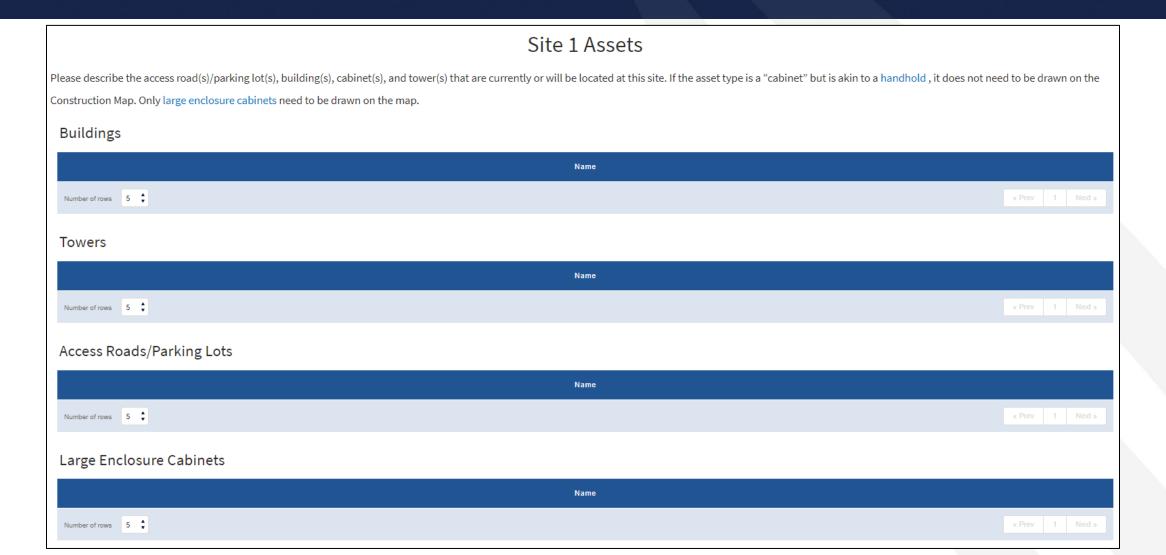
Site Descriptions



Site Descriptions (continued)



Site Descriptions – Site Assets



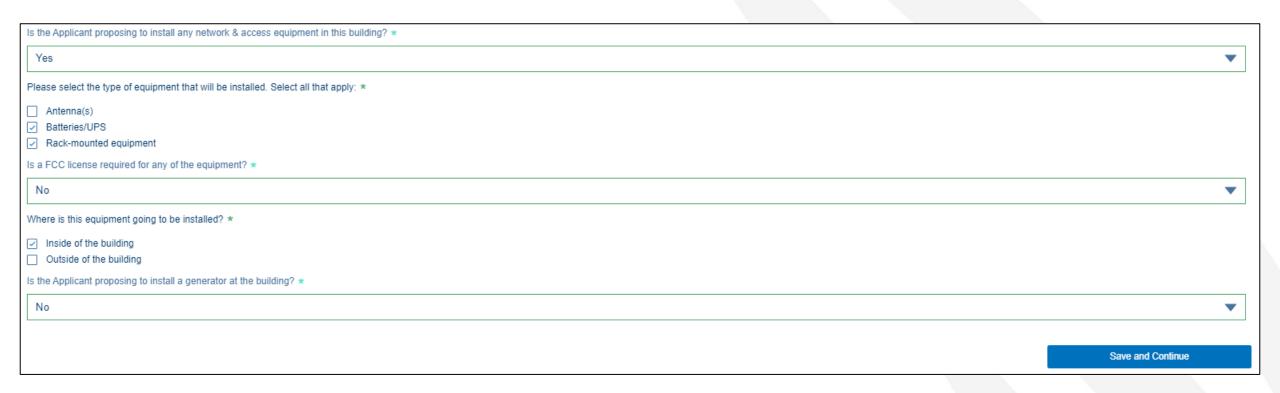
Site Descriptions – New Asset



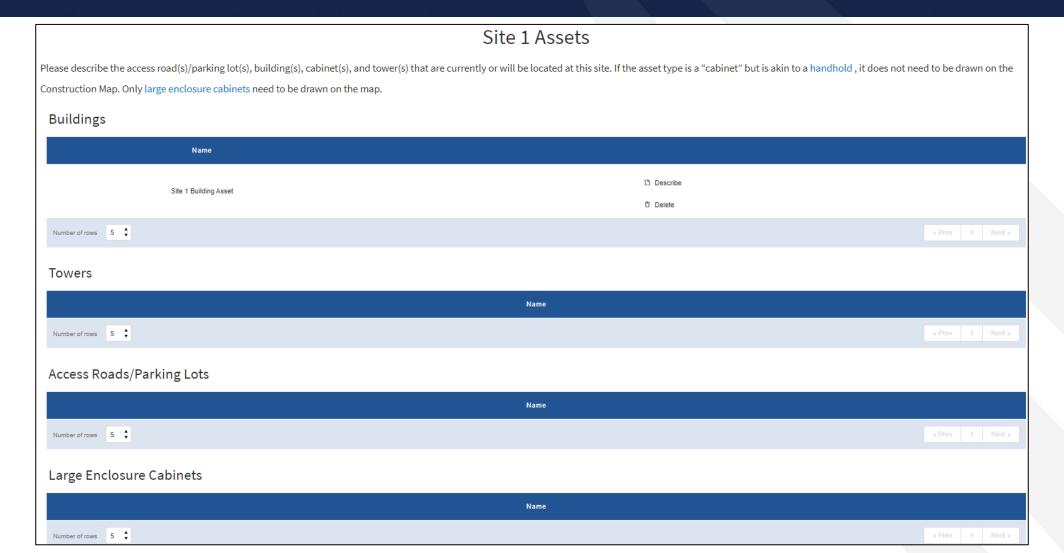
Site Description – Building Asset



Site Description – Building Asset (continued)



Site Description – Asset Added



Route Descriptions

Route Descriptions



Route Descriptions (continued)

Route 1 Description	
Is the proposed route located on or does it cross Tribal Land(s) as identified in the Tribal Lands layer of the construction map?	
*	
Yes	•
Is the proposed route located on or does it cross Federally Managed Land(s) as identified in the Formally Classified Lands layer of the construction map? *	
Yes	•
Is the route New or Upgrading / rebuilding existing telecommunication facilities? *	
✓ New	
Upgrading/Rebuilding	
Is the route in a previously-developed, existing right-of-way? (Select all that apply) *	
✓ Yes. The Route will be in a previously-developed, existing Right-of-Way	
No, a new right-of-way or easement will be required	
No, but area is already in or committed to urbanized development as characterized by a highly disturbed environment with human-built features	

Route Descriptions (continued)

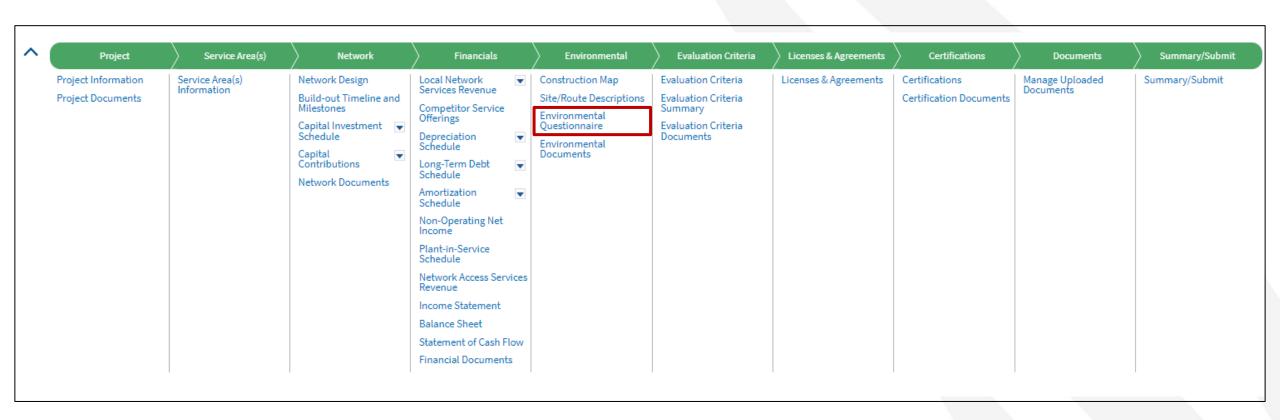
What is the installation method? (Select all that apply) *	
☐ Plowed	
Open Trench	
Existing Conduit Systems	
Existing Ducts	
Aerial Cables on Existing Poles	
Aerial Cables on New Poles	
Underwater	
Bored Miles: *	
14	
If the construction map indicates this route will go through a wetland and it is the applicant's intent to bore under the wetland, please provide entry/exit points for the proposed bore pits. If multiple wetlands/bores are proposed, pl provided in the wetland section of the Site/Route EQ.	lease ensure this data is
Enter entry coordinates (XX.XXXXXXXXX, -XXX.XXXXXXXX):	
Enter exit coordinates (XX.XXXXXXXXX, -XXX.XXXXXXXX):	
Aerial Cables on Existing Poles Miles: *	
275	
Will associated cabinets or underground vaults be installed nearby in previously-disturbed or developed land? *	
Yes	▼
	Save and Continue



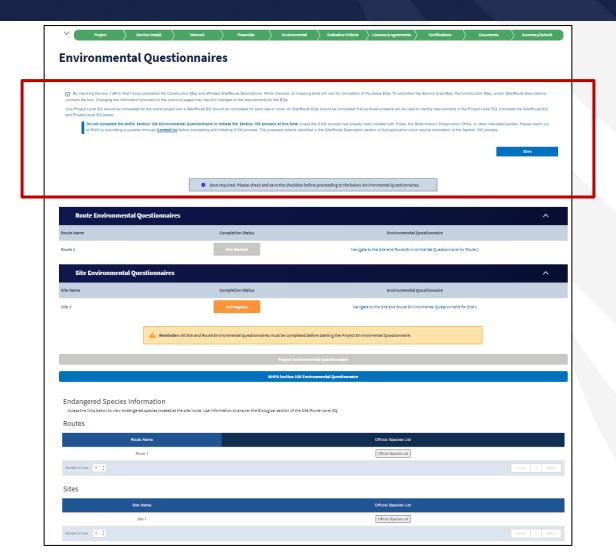
Environmental Questionnaires (EQs)



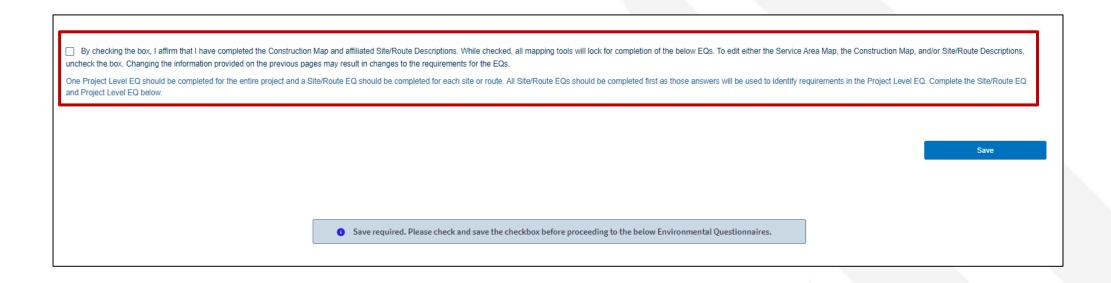
Navigating to the Environmental Questionnaires



Environmental Questionnaires



Environmental Questionnaires (continued)

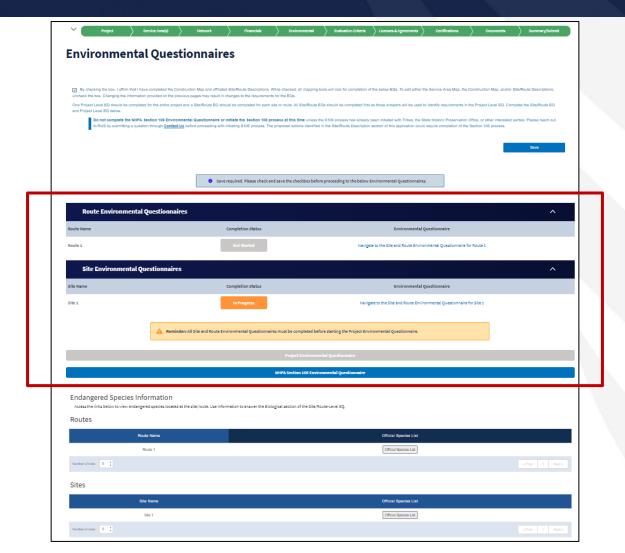


By checking the box, I affirm that I have completed the Construction Map and affiliated Site/Route Descriptions. While checked, all mapping tools will lock for completion of the below EQs. To edit either the Service Area Map, the Construction Map, and/or Site/Route Descriptions, uncheck the box. Changing the information provided on the previous pages may result in changes to the requirements for the EQs.

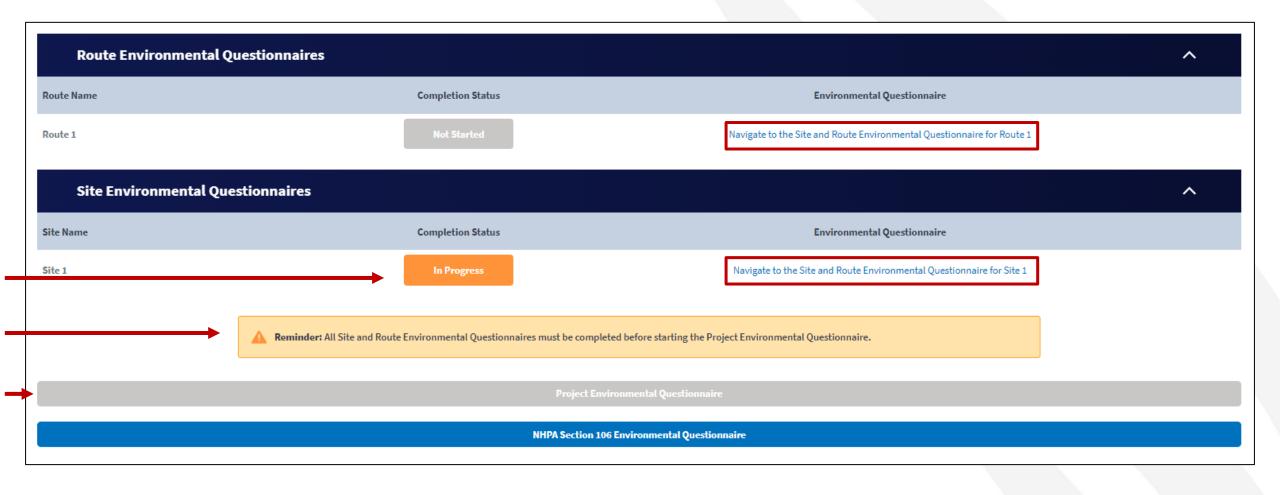
One Project Level EQ should be completed for the entire project and a Site/Route EQ should be completed for each site or route. All Site/Route EQs should be completed first as those answers will be used to identify requirements in the Project Level EQ. Complete the Site/Route EQ and Project Level EQ below.

Do not complete the NHPA Section 106 Environmental Questionnaire or initiate the Section 106 process at this time unless the S106 process has already been initiated with Tribes, the State Historic Preservation Office, or other interested parties. Please reach out to RUS by submitting a question through Contact Us before proceeding with initiating S106 process. The proposed actions identified in the Site/Route Description section of this application could require completion of the Section 106 process.

Environmental Questionnaires (continued)



Environmental Questionnaires (continued)



Site and Route EQs

Site and Route Environmental Questionnaire

Unless the National Historic Preservation Act (NHPA) Section 106 process has already been initiated with Tribes, the State Historic Preservation Office, or other interested parties, do not initiate the NHPA Section 106 process. Following initial review of the project, RUS will initiate the Section 106 process as needed.

The Site and Route Environmental Questionnaire (EQ) is intended to capture the appropriate environmental information for each proposed site and route included in the application. This information will be used in conjunction with the Project EQ to determine the overall environmental compliance of the proposed project. The Rural Utilities Service (RUS) will use this information and either complete the environmental review process or determine the appropriate level of additional impact analyses needed, in accordance with 7 CFR 1970 Environmental Policies and Procedures. The RUS will notify applicants if additional information is necessary beyond what was submitted in

An applicant may submit to the RUS a copy of any environmental review document that has been prepared in connection with obtaining permits, approvals, or other financing for the proposed project from state, local or other federal agencies. Such material, to the extent determined to be relevant, may be used to fulfill the RUS environmental review requirements.

Please use as much space as needed to respond fully to each question. Up to 10,000 characters are permitted in long text fields. Additional information in support of any response can be uploaded as a document in the Documents tab of the Application System.

Floodplains (Subpart F)

Use the Flood Hazard Zones (FEMA)1 layer available in the Construction Map to determine potential impact to a floodplain. If the site/route falls within a community not participating in the National Flood Insurance Program (NFIP) or an area of undetermined flood hazard (Zone D), use the Flood Frequency (NRCS)2 layer available in the Construction Map to determine the flooding frequency of the area. Detailed guidance related to evaluating impacts to and from floodplains can be found in RD Instruction 1970 - Subpart F - Floodplain Management.

Is the applicant's proposed action located in a floodplain?

O Yes O No

¹The minimum floodplain of concern is the 500-year floodplain. If your project is located in the 500- or 100-year floodplain, it should be considered within a floodplain for environmental analysis.

²The frequency of "Rare", "Occasional" or "Frequent" should be considered within a floodplain for environmental analysis.

Wetlands (Subpart G)

Use the National Wetland Inventory (NWI) layer available in the Construction Map to determine potential impact to a wetland. If the

Floodplains (Subpart F)

Use the Flood Hazard Zones (FEMA)¹ layer available in the Construction Map to determine potential impact to a floodplain. If the site/route falls within a community not participating in the National Flood Insurance Program (NFIP) or an area of undetermined flood hazard (Zone D), use the Flood Frequency (NRCS)2 layer available in the Construction Map to determine the flooding frequency of the area. Detailed guidance related to evaluating impacts to and from floodplains can be found in RD Instruction 1970 - Subpart F - Floodplain Management.

No

Is the applicant's proposed action located in a floodplain?

Does the applicant's proposed action have the potential to affect a floodplain?

No

Does the applicant's proposed action have the potential to be affected by a floodplain?

No

The Floodplains review for this site/route is complete.

Floodplains (Subpart F)

Use the Flood Hazard Zones (FEMA)1 layer available in the Construction Map to determine potential impact to a floodplain, If the site/route falls within a community not participating in the National Flood Insurance Program (NFIP) or an area of undetermined flood hazard (Zone D), use the Flood Frequency (NRCS)2 layer available in the Construction Map to determine the flooding frequency of the area. Detailed guidance related to evaluating impacts to and from floodplains can be found in RD Instruction 1970 - Subpart F - Floodplain Management.

Is the applicant's proposed action located in a floodplain?

Yes

O No

Does the applicant's proposed action in the floodplain consist of more than buried and/or aerial utilities lines?

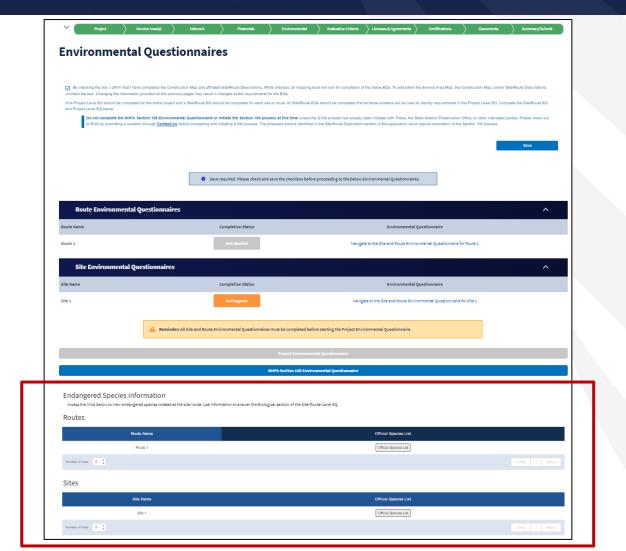


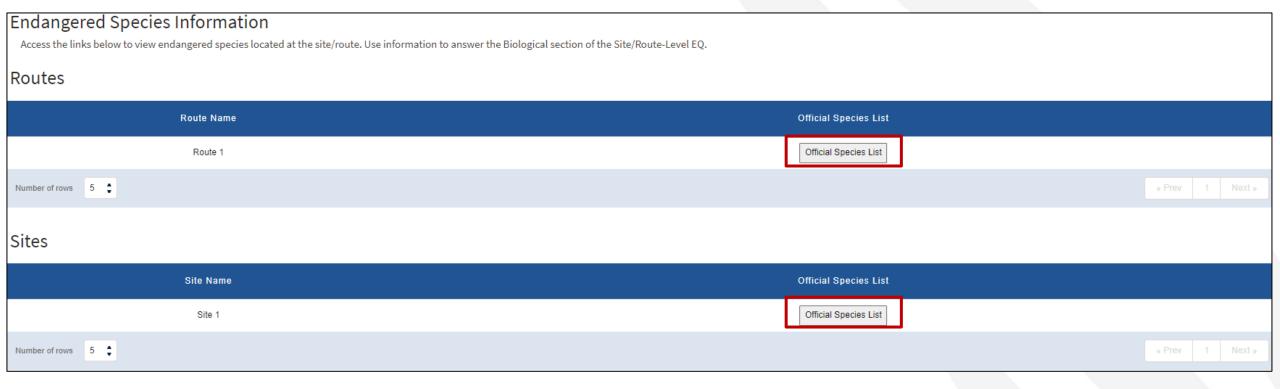
O No

Floodplain analysis is required at the project level. Complete the floodplain section of the Project EQ.

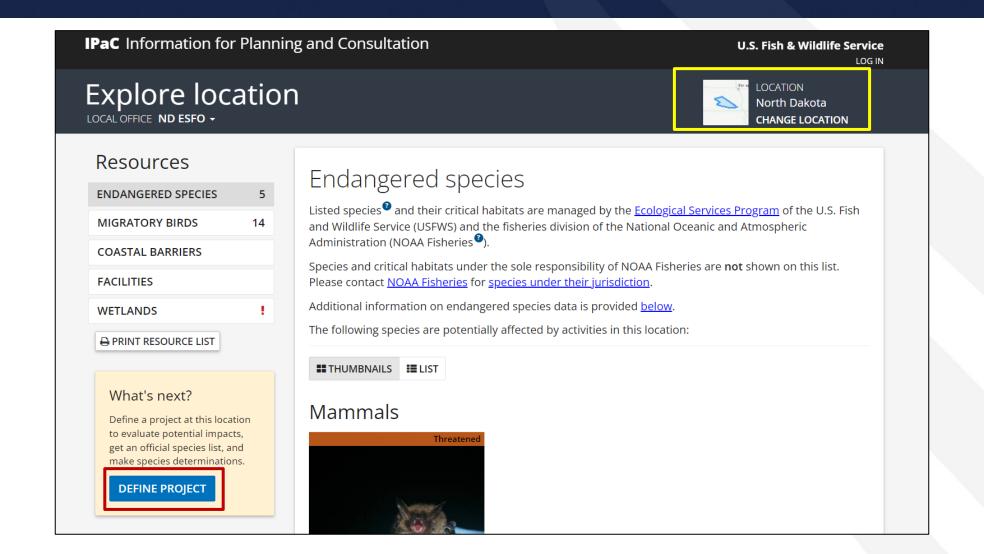
Endangered Species Information

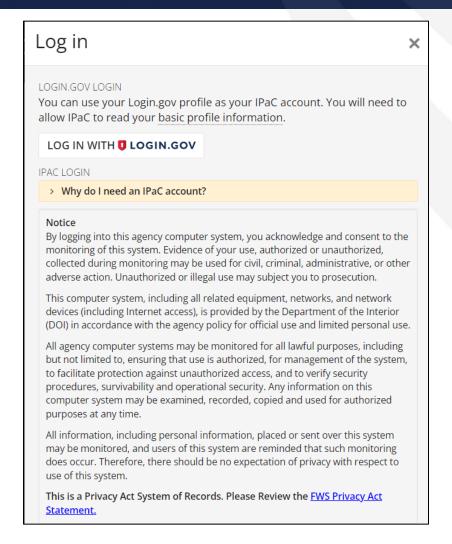
Endangered Species Information

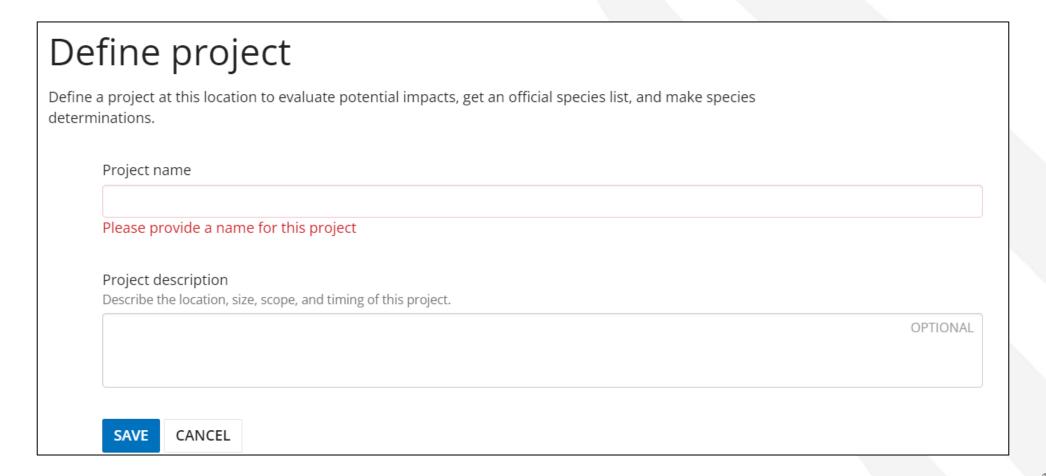


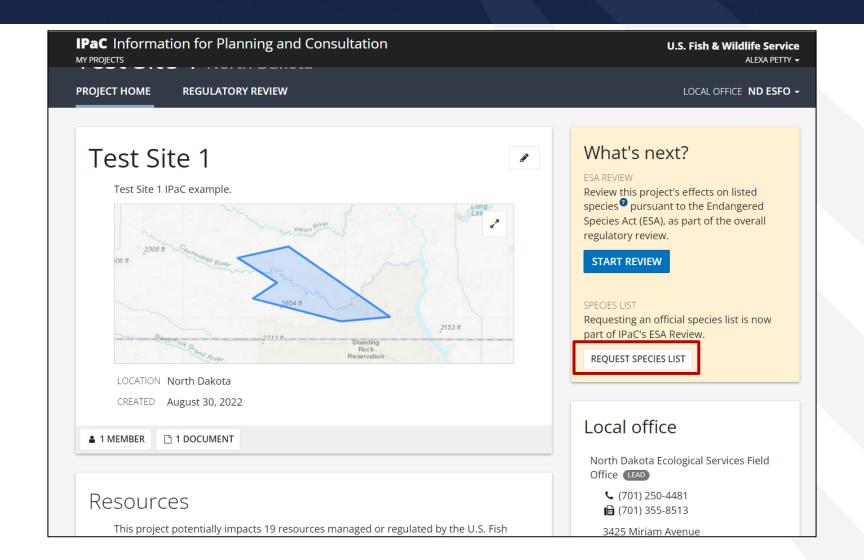


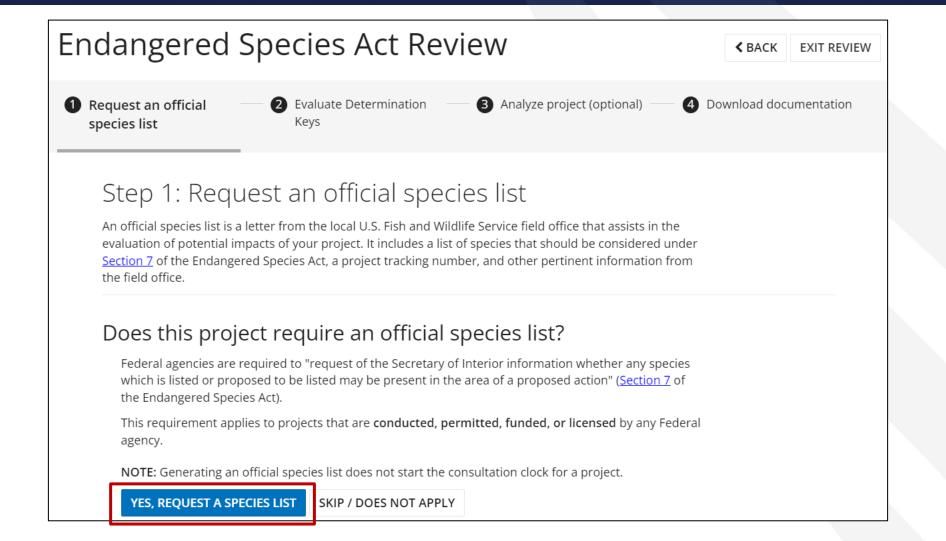
Endangered Species Information - IPaC









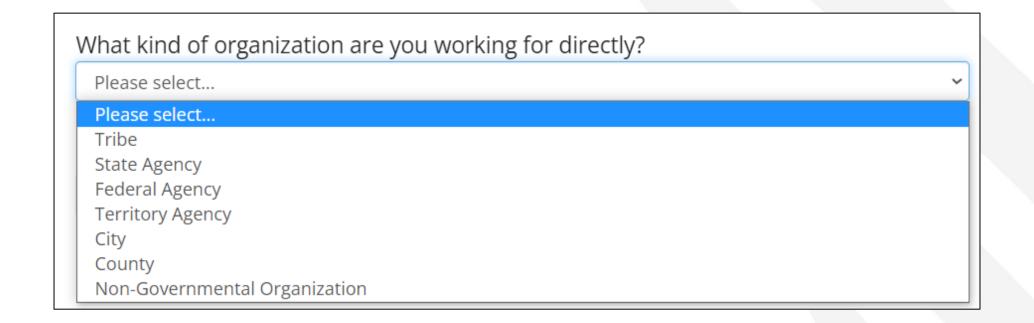


Tell us about the project and your organization or agency

Is this project being conducted, permitted, funded, or licensed by a Federal agency?

O Yes

O No



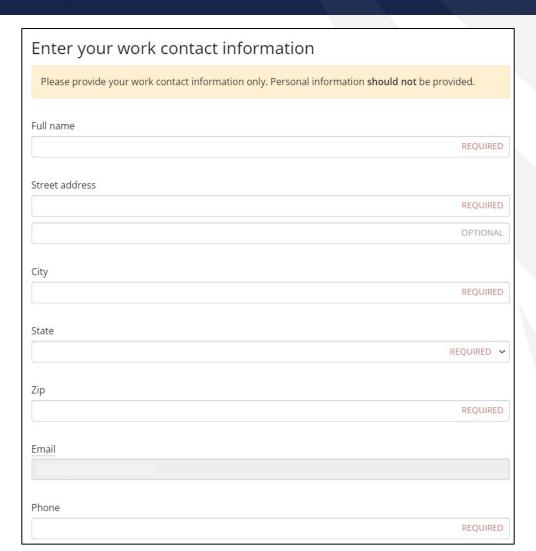


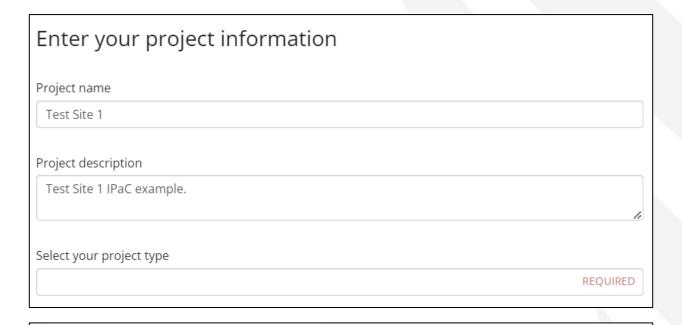
What is the name of your agency?

Tell us about the lead agency for the project

What is the lead agency?

Rural Utilities Service

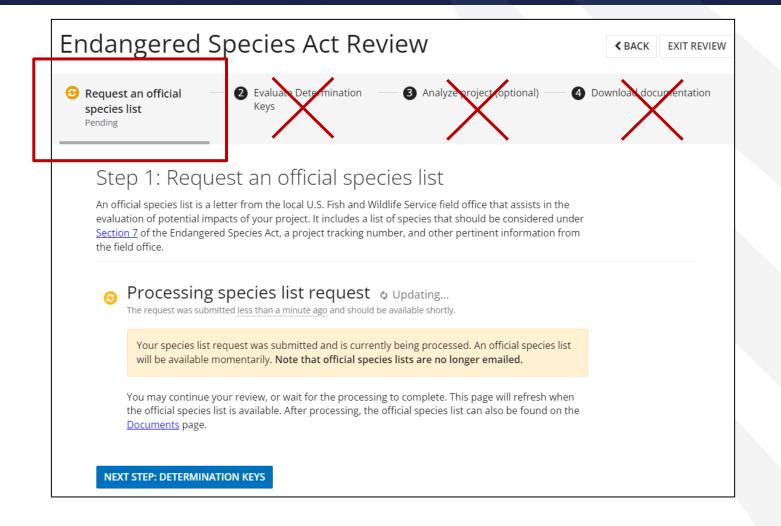


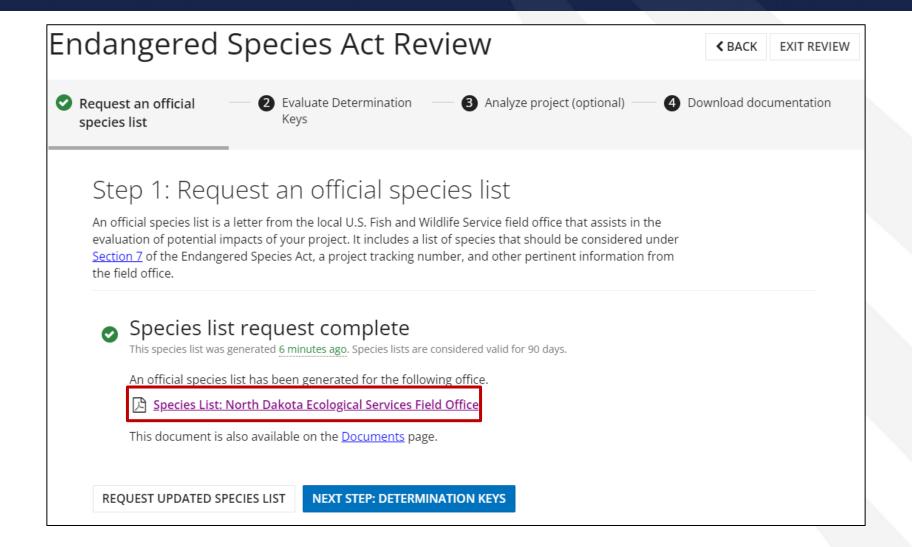


SUBMIT OFFICIAL SPECIES LIST REQUEST

I understand that I am providing this information so an official species list can be generated, based on data provided by my local U.S. Fish and Wildlife Service office for the project area that I entered.

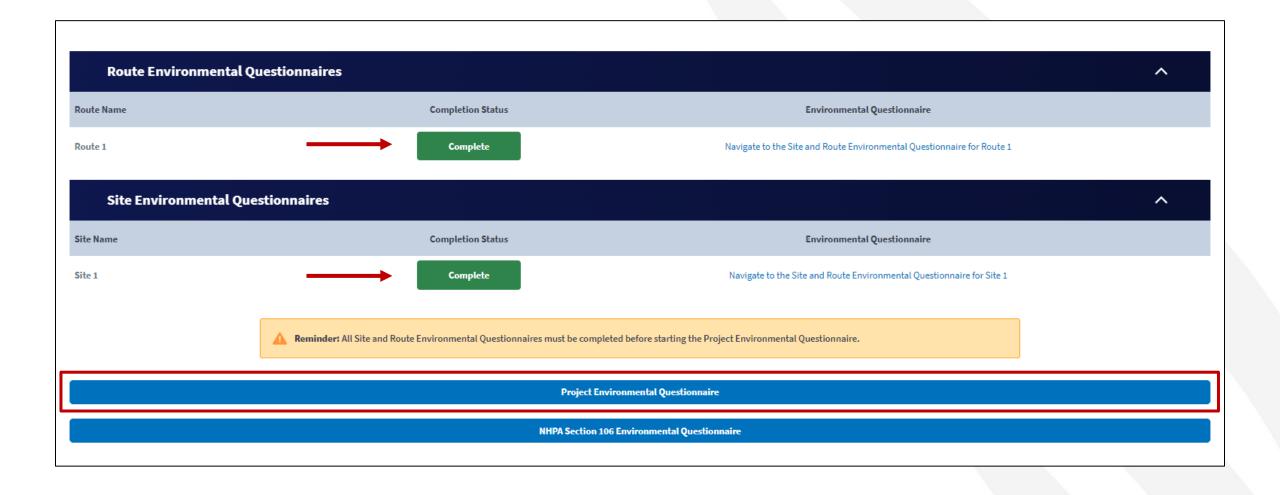
The following authorizes the collection of the above information (5 U.S.C. 301; the Federal Records Act, 44 U.S.C. 3101; Homeland Security Act of 2002; Public Law 107-296, 6 U.S.C. 121; and Executive Order 9373) and will be maintained in accordance with the Privacy Act (5 U.S.C. 552a).





Project EQ

Project EQ



Project EQ (continued)

Project Environmental Questionnaire

Unless the National Historic Preservation Act (NHPA) Section 106 process has already been initiated with Tribes, the State Historic Preservation Office, or other interested parties, do not initiate the NHPA Section 106 process. Following initial review of the project, RUS will initiate the Section 106 process as needed.

The Project Environmental Questionnaire (EQ) is intended to capture the appropriate environmental information for each proposed site and route included in the application as well as the overall project. This information will be used in conjunction with each Site and Route EQ to determine the overall environmental compliance of the proposed project. RUS will use this information and either complete the environmental review process or determine the appropriate level of additional impact analyses needed, in accordance with 7 CFR 1970: Environmental Policies and Procedures. RUS will notify applicants if additional information is necessary beyond what was submitted in the EQs.

An applicant may submit a copy of any environmental review document that has been prepared in connection with obtaining permits, approvals, or other financing for the proposed project from state, local or other federal agencies. Such material, to the extent determined to be relevant, may be used to fulfill the RUS environmental review requirements.

This EQ consists of two sections: "Preliminary Environmental Questions" and "Detailed Environmental Responses". Responses under "Preliminary Environmental Questions" will identify which portions of the "Detailed Environmental Responses" must be completed.

Preliminary Environmental Questions

Floodplains (Subpart F)

Do any of the applicant's site or route EQ(s) identify a requirement for floodplain analysis to be conducted at the project level? If the response to Questions 2, 3, or 4 on any site or route EQ is YES, select YES.



O No

Floodplains (Subpart F) under the Detailed Environmental Responses section must be completed by the applicant. This data is pre-populated from Site and Route Environmental Questionnaire responses. If this data is inaccurate, please modify the responses to the Site and Route Environmental Questionnaires before proceeding.

Detailed Environmental Responses

Please use as much space as needed to respond fully to each question. Up to 10,000 characters are permitted in long text fields. Additional information in support of any response can be uploaded as a document in the Documents tab of the Application System.

Public notices should be placed in a newspaper of general circulation (both in print and online) within the affected areas. The notice must be published in the non-classified section of the newspaper. If the affected area is largely non-English speaking or bilingual, the notice must be published in both English and non-English language newspapers serving the affected area, if both are available. In general, the timeframe between Preliminary and Final notices shall be 14 days, unless there is reason to extend the comment period.

Floodplains (Subpart F)

Relevant Site/Route Environmental Questionnaire Responses

OU	

Complete the Public Noticing Template: Template Preliminary Public Notice Language for Potential Impacts to Floodplains (RD 1970 Subpart F Exhibit B Attachment B-1). The notice must include all sites that will be located in, or will have the potential to affect, or be affected by a floodplain, as identified in the site or route EQ.

Preliminary Notice. Has the Preliminary Notice been published?

\circ	Yes
\cap	No

Public Notice Period. Has the minimum preliminary public notice period of 14 days elapsed since the publication of the Preliminary Notice?

\cup	Ye
\bigcirc	No

○ No

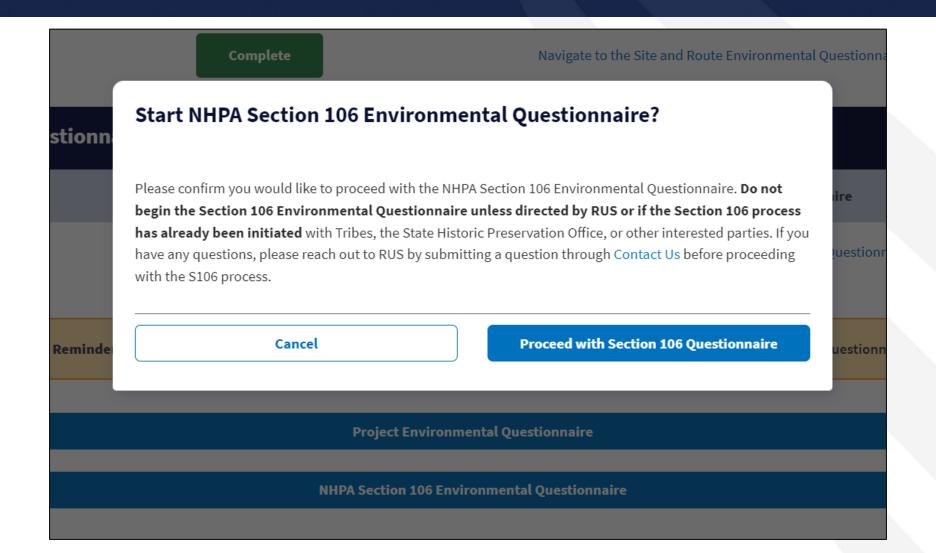
Practicable Alternatives. For each site that may impact a floodplain, identify and evaluate practicable alternatives to locating the proposed action in the floodplain. Include off-site and on-site alternatives, alternative configurations, other avoidance actions, and the "no action" alternative, as appropriate. A "practicable" alternative is one which can be implemented considering cost, logistics, and technology. If no practicable alternatives exist, this must be explained. For example, for a proposed structure inside the floodplain, alternatives may include constructing the structure outside the floodplain, elevating the structure out of the floodplain, and the "no action" alternative. The "no action" alternative must be considered for each site.

NHPA Section 106 EQ

NHPA Section 106 EQ



NHPA Section 106 EQ (continued)



NHPA Section 106 EQ (continued)

National Historic Preservation Act Section 106 Environmental Questionnaire Unless the National Historic Preservation Act (NHPA) Section 106 process has already been initiated with Tribes, the State Historic Preservation Office, or other interested parties, do not initiate the NHPA Section 106 process. Following initial review of the project, RUS will initiate the Section 106 process as needed. The NHPA Section 106 EQ is intended to capture the appropriate information for each proposed site and/or route included in the application as well as the overall proposed project. This information will be used in conjunction with each Site and Route EQ and Project EQ to determine the overall compliance of the proposed project with the NHPA Section 106 requirements. RUS will use this information and either complete the NHPA Section 106 portion of the environmental review process or determine the appropriate level of additional impact analysis(es) needed, in accordance with 7 CFR 1970: Environmental Policies and Procedures . The RUS will notify applicants if additional information is necessary beyond what was submitted in each of the EQs. An applicant may submit a copy of any environmental review document that has been prepared in connection with obtaining permits, approvals, or other financing for the proposed project from state, local or other federal agencies. Such material, to the extent determined to be relevant, may be used to fulfill the RUS environmental review requirements. Be advised, once an applicant initiates the NHPA Section 106 process with the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), or other interested parties, the applicant must complete the process even if the RUS determines the type of construction activity has "No potential to cause effects". The NHPA Section 106 EQ requirement is determined by the applicant's responses to each of the Site and/or Route Description questions. For example, if the applicant answers "Yes" to the question, "Is this site on Tribal Land(s)?", the NHPA Section 106 EQ may need to be uploaded as part of the application. **NHPA Section 106 Questions** SHPO Initiation: Has the applicant sent a notification letter (SHPO Notification Letter Template) or a finding letter (SHPO Finding Letter Template) to the applicable SHPO(s)? O Yes O No

SHPO Initiation: Has the applicant sent a notification letter (SHPO Notification Letter Template) or a finding letter (SHPO Finding Letter Template) to the applicable SHPO(s)?

Yes

No

Subpart H - S106 State
Historic Preservation
Office Letters

SHPO/THPO Response Period: If the applicant sent notification or finding letters to the applicable SHPO(s) and THPO(s), has a response been received from any of these entities?

Yes

No

Save

SHPO Initiation: Has the applicant sent a notification letter (SHPO Notification Letter Template) or a finding letter (SHPO Finding Letter Template) to the applicable SHPO(s)?

Yes

No

Do not complete the NPHA Section 106 EQ or initiate the Section 106 process at this time. Please reach out to

Save

RUS by submitting a question through the Contact Us page to determine next steps.



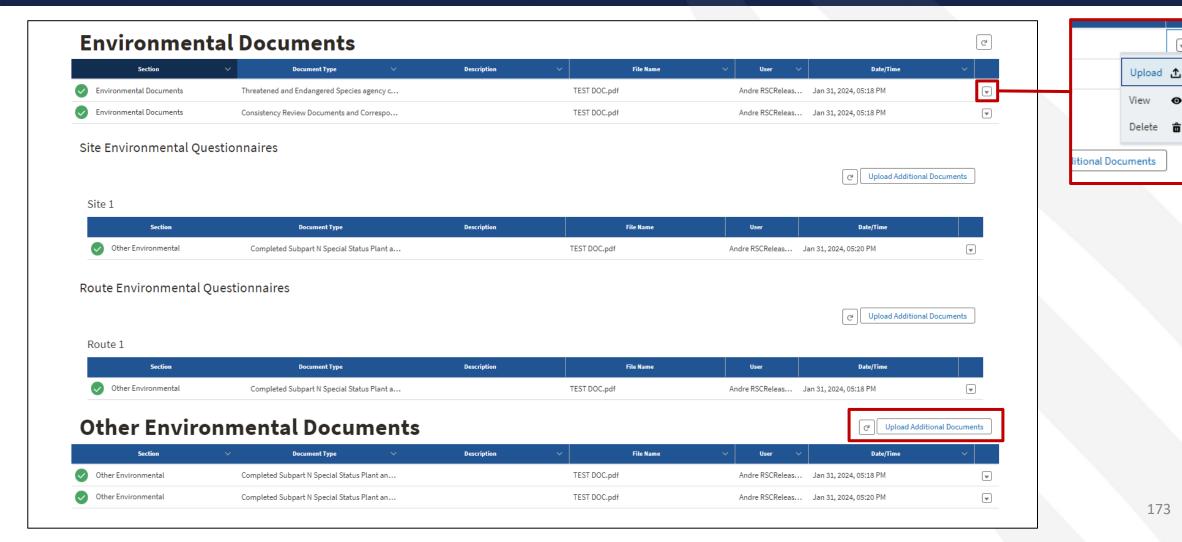
Environmental Documents



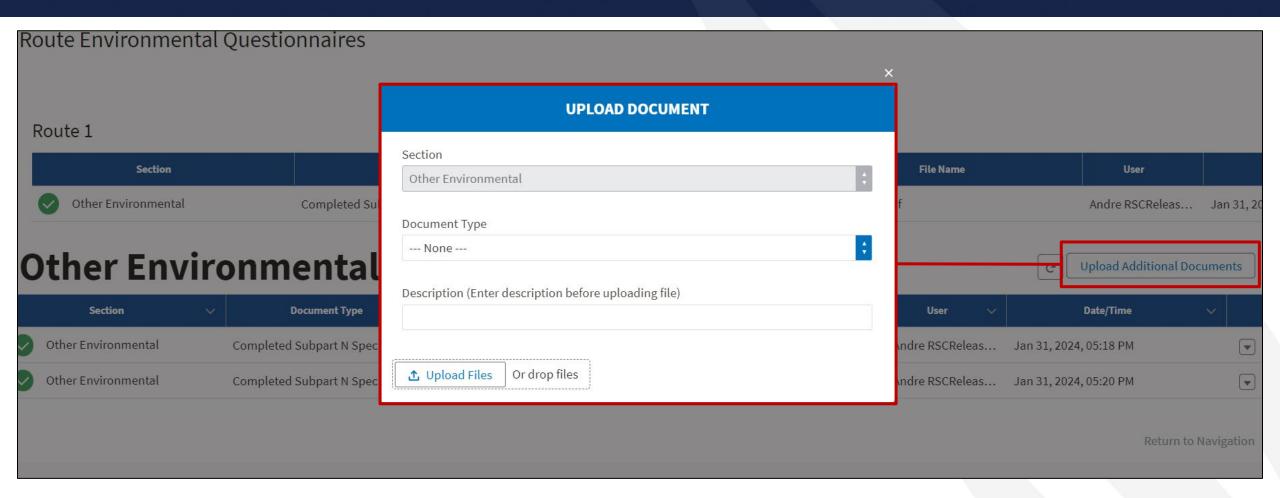
Navigating to the Environmental Documents



Environmental Documents



Environmental Documents (continued)









ReConnect Round 5 Application Workshop

Grant Accounting - High Level Overview

Silver Legacy AT The Row

407 N. Virginia Street, Reno, Nevada 89501 February 27-29, 2024



Theresa Anim

Financial and Loan Business
Specialist
Loan Origination and Approval
Division

GAAP Grant Accounting Information

Overview

- Purpose of Grant Accounting
- Types of Accounting Methods
- Primary Entity Types
- Q&A (Types of Accounting Methods/Primary Entity Types)
- Line-items related to Grant Accounting (within Applicant's Proforma)
- Grant Accounting Entry Examples (within Salesforce)
- Common Errors
- Additional Resources
- Contact Info
- Q&A (Grant Accounting Entry Examples)

GAAP Grant Accounting Information

Purpose of Grant Accounting

Designed to help the Financial Reviewers validate and confirm that applicants properly accounted for all grant funds associated with the proposed project, including grant awards from ReConnect Rounds 1-4. For the ReConnect Program, Grant Accounting is slightly complicated and an area where we receive several questions from applicants. It is very important that applicants allocate grant funds appropriately and use the *Assumptions* feature in *Salesforce*, to include what the break-out is within their Application, for other grants that were received, or the potential ReConnect Grant; especially over the Pro-forma years.

Grant Accounting is Applicable for the following ReConnect Applications

Grant Accounting applies to applicants that are applying for the following grant funding types (100% Grant, 50% Loan - 50% Grant, 100% Grant for Alaska Native Corporations, Tribal Governments, Colonia's, Persistent Poverty Areas and Socially Vulnerable Communities, and Projects serving areas where 90% of households lack sufficient access to broadband).







Three Types of Accounting Methods

- Immediate Revenue Recognition Method Entities would recognize the grant revenue in the year in which the grant was received. This method is commonly used by Not-For-Profits, Government Entities, and Indian Tribes.
- Deferred Revenue Recognition Method Entities would recognize the grant revenue over the life of the assets constructed. This
 method is commonly used by For-Profits and Non-Regulated utilities.
- Contribution in Aid of Construction (CIAC) Method Entities reduce assets constructed by the grant funds received. There is no revenue recognition, but depreciation expense is reduced over the useful life of the assets. This method is commonly used by Utility Cooperatives and Regulated Entities.

^{*}Important Note* When filling out the requested information within the Financial Tab (in Salesforce), it is important to keep in mind that the entity type that is selected will affect how grant revenue is reported.

The primary entity types follow unique accounting requirements, and each report grant revenue slightly differently in their audited financial statements, which may require them to report the required quarterly and (or) annual financial reporting to RUS slightly differently.

Primary Entity Types

Governmental Entities, Indian Tribes, or Territories and Possession of the U.S, and Not-For-Profits

For Profits and Non-Regulated Utilities

Regulated Utilities and Utility Cooperatives

Governmental Entities, Indian Tribes, or Territories and Possession of the U.S, and Not-For-Profits

The preferred method to recognize grant funds is to record the grant revenue in full during the period in which the grant funds are received. However, depending on how the Not-For-Profit entity is set-up, these entities may use another method in recognizing the income when preparing audited financial statements in accordance with US-GAAP.



For Profits and Non-Regulated Utilities

The preferred method is to recognize grant funds over the useful lives of the assets constructed. However, depending on how the For-Profit entity is set-up, these entities may use another method in recognizing the income when preparing audited financial statements in accordance with US-GAAP.



Regulated Utilities and Cooperatives

The preferred method to recognize grant funds is to reduce the cost basis of the assets constructed by the amount of grant funds received. However, depending on how the entity is set-up, these entities may use another method in recognizing the income when preparing audited financial statements in accordance with US-GAAP.





Let's Recap What We've Learned...



Each of the **three Accounting Methods** has its own set of **line items** that affect **grant accounting**. The table below outlines the line items that should be populated within the ReConnect application for each of the Accounting Methods. If Applicants follow the chart below as a guide, this will also help Financial Reviewers understand which accounting method the applicant is using when submitting their ReConnect Application.

Key: Line Items that affect Cash Line Items that do not Affect	: Cash		
Line Item Location	For Profit and Non-Regulated Utilities: Deferred Revenue Recognition	Regulated Utilities and Cooperatives: CIAC	Not-For-Profits, Govt. Entities, and Tribes: Immediate Revenue Recognition
Plant in Service: Less Grant Funded Expenses	Yes	Yes	Yes
Plant in Service: Less Grant Funded Assets	No	Yes	No
Depreciation Expense Summary: Less Grant Funded Plant	No	Yes	No
Income Statement: Amortized Grant Revenue	Yes	No	Yes
Balance Sheet: Deferred Grant Revenue	Yes	No	No
Statement of Cash Flows: Plant Constructed Using Grant Proceeds	Yes	Yes	Yes
Statement of Cash Flows: Proceeds from Grant Funds	Yes	Yes	Yes



When a Financial Reviewer analyzes whether the applicant completed their Grant Accounting correctly, the most important line items are those that impact cash (it is critical that these line items are accurate within Salesforce). Below are the line items that have a cash impact and their location within the Applicant's Proforma/Financial Statement:

- Amortized Grant Revenue: Income Statement (Operating Revenue)
- Plant Constructed Using Grant Proceeds: Statement of Cash Flows (Cash Flows from Investing Activities)
- Proceeds from Grant Funds: Statement of Cash Flows (Cash Flows from Financing Activities)

In addition to those line items that impact cash, there are also line items that relate to Grant Accounting, but do not have an impact on cash. Below are the line items that **do not have a cash impact** and their location within the Applicant's Proforma/Financial Statement:

- Plant in Service: Less Grant Funded Assets (Property, Plant and Equipment)
- Plant in Service: Less Grant Funded Expenses (Property, Plant and Equipment)
- Depreciation Expense Summary: Less Grant Funded Plant (Property, Plant and Equipment)
- Balance Sheet: Deferred Grant Revenue (Other Liabilities and Deferred Credits)

Capital Expenditures (Plant Constructed Using Grant Proceeds; located on the Statement of Cash Flows) and an offsetting entry to Amortized Grant Revenue (Statement of Cash Flows) are additional line items that may affect Grant Accounting. Capital Expenditures may be overstated if capital items funded by any grant proceeds are included in this line item. Grant funded capital items need to be reported on the Plant Constructed Using Grant Proceeds line, which is located on the Statement of Cash Flows.

The **offset** to *Amortized Grant Revenue* should be recognized within the *Proceeds from Grant Funds* line item found on the (Statement of Cash Flows). *Plant Constructed Using Grant Proceeds* and *Proceeds from Grant Funds* are designed to cancel out one another (unless the *offsetting entry for Amortized Grant Revenue* is included in the *Proceeds from Grant Funds* line item).

If an applicant is a prior ReConnect grant awardee, any funds that would be reflected as Plant Constructed Using Grant Proceeds for prior awards will be reflected as Capital Expenditures for the current application (Round 5). Only grant funds associated with the Round 5 application should be reflected as Plant Constructed Using Grant Proceeds. However, to offset the capital expenditures, any grant funds associated with the prior ReConnect awards should be reflected as Proceeds from Grant Funds, ultimately resulting in a net zero effect.

Important Note It is important to remember that Grant Accounting should always result in a net zero effect for the applicant. In other words, for every input (revenue), there should be a corresponding output (expense).

It is important to remember there should always be an offsetting entry for Amortized Grant Revenue (unless the entity type is a Regulated Utility or Cooperative). Applicants are instructed to incorporate the offsetting entry under the Proceeds from Grant Funds line item (on the Statement of Cash Flows). If the applicant reflects Amortized Grant Revenue (on the Income Statement) under Operating Revenues, the applicant should ensure the offsetting funds are being captured elsewhere. The correct method is for the Applicant to include it as Cash Flows from Financing Activities – Other (on the Statement of Cash Flows).

Applicants should keep in mind the income for Amortized Grant Revenue **should not be recognized** as Non-Operating Net Income (NONI) on the **Income Statement**.

				Non	OPEDAT		NGOVE				
Non-Operating Revenue		Historic	al Years	NON	Bridge Year	ING NET I	NCOME	Forecast Years			
ITEM	Year 4	Year 3	Year 2	Year 1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Item Assumption
Ohio Grant Revenue	2019 S -	2020 \$ -	2021 \$ 1,800,000	2022 \$ -	2023 \$ 5,200,000	2024 \$ -	2025 \$ -	2026	2027 \$ -	2028	Ohio Broadband Grant
	s -	s -	\$ 1,800,000	\$ -	\$ 3,200,000	\$ 2,000,000	\$ 1,400,000	\$ 1,200,000	\$ 2,300,000		Grant Proceeds from ReConnect Round 5
Revenue Total		S -	\$ 1,800,000		\$ 5,200,000	\$ 2,000,000	S 1,400,000	\$ 1,200,000	\$ 2,300,000	\$ 2,700,000	
Non-Operating Expense		Uistorie	al Years		Bridge Year			Forecast Years			
ITEM	Year 4 2019	Year 3 2020	Year 2 2021	Year 1 2022	Year 0 2022	Year 1 2024	Year 2 2025	Year 3 2026	Year 4 2027	Year 5 2028	Item Assumption
Impairment on Intangible Asset	\$ -	\$ -	\$ 2,000		\$ -	S -	\$ -	S -	\$ -	\$ -	Loss - none forecasted
Expense Total	S -	\$ -	\$ 2,000	S -	\$ -	\$ -	\$ -	S -	S -	S -	



Applicants should reflect all income from RDOF funds as Network Access Services Revenue. This revenue then gets populated on the Income Statement.

Generally, RDOF expenses can be captured into two areas within the application:

- Other Operating Expenses (Income Statement) this would capture non-capital portion or operating expenses (for example; personnel) of the RDOF reward.
- Capital Expenditures (Statement of Cash Flows) this would capture any expenses that were used for the broadband capital
 expenditures (capital expense portion only).

Note: If an applicant wants to determine if RDOF funds were received, this information can be verified by referring to the monthly payment schedules reflected at the Universal Service Administrative Co. website: <u>USAC</u>.

GAAP Grant Accounting Information (Amortized Grant Revenue Entry)

			INCOME S	TATEMENT						
		Historic	al Years		Bridge Year			Forecast Years		
	Year 4	Year 3	Year 2	Year 1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
1 Local Network Services Revenue	\$ 135,000	\$ 192,000	\$ 218,000	\$ 321,000	\$ 430,000	\$ 948,000	\$ 2,076,000	\$ 3,216,000 \$	4,077,000	\$ 4,376,000
2 Network Access Services Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ -
3 Long Distance Network Services Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$	- [\$ -
4 Carrier Billing and Collection Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ -
5 Other Operating Revenue	\$ -	\$ -	\$ -	\$ -	*	\$ -	\$ -	\$ - \$		\$ -
6 Amortized Grant Revenue	\$ -	\$ -	\$ -	\$ -	\$ 499,000	\$ 499,000	\$ 841,000	\$ 1,075,000 \$	1,100,000	\$ 1,108,000
7 Uncollectible Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$		\$ -
8 Net Operating Revenues (Lines 1 + 2 + 3 + 4 + 5 + 6 - 7)	\$ 135,000	\$ 192,000	\$ 218,000	\$ 321,000	\$ 929,000	\$ 1,447,000			5,177,000	
9 Plant Specific Operations Expense	\$ -	\$ -	\$ -	\$ -	\$ 67,000	\$ 99,000	\$ 200,000	\$ 300,000 \$	325,000	\$ 350,000
10 Plant Nonspecific Operations Expense (Excluding Depreciation and Amortization)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$		\$ -
11 Depreciation Expense	\$ 102,000	\$ 205,000	\$ 187,000	\$ 565,000	\$ 588,000	\$ 916,000	\$ 1,442,000	\$ 1,680,000 \$	1,709,000	\$ 1,719,000
12 Amortization Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ -
13 Customer Operations and Corporate Operations Expenses	\$ 40,000	\$ 77,000	\$ 100,000	\$ 129,000	\$ 132,000	\$ 139,000	\$ 146,000	\$ 153,000 \$	160,000	\$ 168,000
14 Other Operating Expense	\$ 110,000	\$ 117,000	\$ 124,000	\$ 137,000	\$ 123,000	\$ 111,000	\$ 100,000	\$ 90,000 \$	81,000	\$ 73,000
15 Total Operating Expenses (Lines 9 through 14)	\$ 252,000	\$ 399,000	\$ 410,000	\$ 832,000	\$ 910,000	\$ 1,265,000	\$ 1,887,000	\$ 2,222,000 \$	2,276,000	\$ 2,310,000
16 Operating Income or Margins (Line 8 less Line 15)	\$ (117,000)	\$ (207,000)	\$ (192,000)	\$ (511,000)	\$ 19,000	\$ 181,000	\$ 1,030,000	\$ 2,068,000 \$	2,902,000	\$ 3,174,000
17 Nonoperating Net Income	\$ -	\$ -	\$ (2,000)	\$ -						
18 Interest on Funded Debt (RUS, RTB and FFB Notes)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ -
19 Other Interest Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ -
20 Interest on Line(s) of Credit	\$ -	\$ -	\$ 27,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000 \$	86,000	\$ 86,000
21 Allowance for Funds Used During Construction	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$	-	\$ -
22 Total Fixed Charges (18+19+20-21)	\$ -	\$ -	\$ 27,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000 \$	86,000	\$ 86,000
23 Taxes	\$ -	\$ -	\$ -	\$ -	\$	\$ -	\$ -	\$ - \$	-	\$ -
24 Extraordinary Items										
25 Total Net Income or Margins (16 + 17 -22 - 23 + 24)	\$ (117,000)	\$ (207,000)	\$ 1,579,000	\$ (597,000)	\$ 5,133,000	\$ 2,095,000	\$ 2,344,000	\$ 3,182,000 \$	5,116,000	\$ 5,788,000
26 EBITDA (11+12+25+23+22)	\$ (15,000)	\$ (2,000)	\$ 1,792,000	\$ 55,000	\$ 5,807,000	\$ 3,098,000	\$ 3,872,000	\$ 4,948,000 \$	6,911,000	\$ 7,593,000
27 EBIT (22+23+25)	\$ (117,000)	\$ (207,000)	\$ 1,606,000	\$ (511,000)	\$ 5,219,000	\$ 2,181,000	\$ 2,430,000	\$ 3,268,000 \$	5,202,000	\$ 5,874,000
28 Principal Payments on Long-Term Debt and Capital Leases	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - \$		\$ -
29 TIER ((25+22) / 22))			59.48	-5.94	60.69	25.36	28.26	38.00	60.49	68.30
30 DSCR ((11+12+22+25) / (18+19+28))										
31 Network Access Services Revenue / Net Operating Revenues (2 / 8)										
Cash Flow from Operations / Total Debt Service: (Cash Flow line item 11 /										
32 (Income St. line items 18 + 19 + 28))		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
33 Revenue Trend	34.44%									
34 Operating Margin	-11.11%		829.63%	17.13%	625.08%	214.10%	132.74%	115.34%	133.49%	138.46%
35 Operating Margin Volatility	36.75%									
36 Percentage of Non-Operating Income	0.00%	0.00%	-0.93%	0.00%						

GAAP Grant Accounting Information (Offsetting Entry to Amortized Grant Revenue)

		STATEM	MENT	OF CA	ASH 1	FLOW	S								
			Historic	cal Years			Bridg	ge Year			For	recast Years			
		Year 3		ar 2		ear 1		Year 0	Year 1	Year 2		Year 3	Year 4		Year 5
		2020	20	021	20	022		2023	2024	2025		2026	2027		2028
l Beginning Cash (Cash & Equivalents plus RUS Const. Fund)	\$	-	\$	2,000	\$	(954,000)	\$	(1,000,000)	\$ 2,671,000	\$ (2,826,000)) \$	(1,083,000) \$	1,623,000	\$	6,293,000
CASH FLOWS FROM OPERATING ACTIVITIES															
2 Net Income (Loss)	\$	(207,000)	\$ 1,	,620,000	\$	(597,000)	\$	5,166,000	\$ 95,000	\$ 8,765,000	\$	4,957,000 \$	3,347,000	\$	3,221,000
ADJUSTMENTS TO RECONCILE NET INCOME (LOSS) TO NET CASH PROVIDED BY OPERATIN	NG ACT		_		_										
3 Add: Depreciation	\$	205,000	\$	187,000	\$	565,000	\$	588,000	\$ 916,000	\$ 1,442,000	\$	1,680,000 \$	1,709,000	\$	1,719,000
4 Add: Amortization	\$	-	\$	-	\$	-	\$	-	\$ -	\$ -	\$	- \$	-	\$	-
5 Other (Explain)															
CHANGES IN OPERATING ASSETS & LIABILITIES							_				_				
6 Decrease / (Increase) in Accounts Receivable	\$	-	\$	-	,	(182,000)	\$	-	\$ -	\$ -	\$	- \$	-	\$	-
7 Decrease / (Increase) in Materials & Inventory	\$	-	\$		\$	-	\$	-	\$ -	\$ -	\$	- \$	-	\$	-
8 Decrease / (Increase) in Other Current Assets, Interest, and Dividends Receivable	\$	(3,000)	\$	(12,000)	\$	38,000	_	(37,000)	\$ -	\$ -	\$	- \$	-	\$	-
9 Increase / (Decrease) in Accounts Payable	\$	15,000	\$	401,000	\$	41,000	_	38,000	\$ 15,000	\$ 15,000	\$	16,000 \$	16,000	\$	17,000
10 Increase / (Decrease) in Other Current Liabilities	\$	-	\$	-	\$	1,894		(1,894)	\$ -	\$ -	\$	- \$	-	\$	-
11 Net Cash Provided/(Used) by Operations	\$	9,000	\$ 2,	,135,000	\$	(133,000)	\$	5,753,000	\$ 1,027,000	\$ 10,222,000	\$	6,652,000 \$	5,073,000	\$	4,957,000
CASH FLOWS FROM INVESTING ACTIVITIES							_								
12 Capital Expenditures (excluding plant constructed using grant proceeds)	\$	(38,000)		(1,555,000)		(23,000)	\$	-	. (=/://		-	(5,246,000) \$		\$	
a. Plant Constructed Using Grant Proceeds	\$	-	\$ 1	(2,841,000)	\$	-	\$	-	\$ (3,640,000)	\$ (921,000) \$	(3,975,000) \$	(382,000)	\$	(682,000)
13 Other Long-Term Investments	\$	-	\$	-	\$	-	\$	-	\$ -	<u> </u>	\$	- \$	-	\$	-
14 Intangible Assets	\$	(272,000)		7,000	\$	28,000	\$	28,000	\$ 28,000	\$ 28,000	\$	28,000 \$	28,000	\$	28,000
15 Other Noncurrent Assets	\$	7,000	\$	-	\$	-	\$	-	\$ -	\$ -	\$	- \$	-	\$	
16 Other (Explain)															
17 Net Cash Provided/(Used) by Investing Activities	\$	(303,000)	\$ (4,	,389,000)	\$	6,000	\$	28,000	\$ (6,380,000)	\$ (8,479,000)) \$	(3,946,000) \$	(403,000)	\$	(1,000,000)
CASH FLOWS FROM FINANCING ACTIVITIES							_				_				
18 Decrease / (Increase) in Notes Receivable	\$	-	\$		\$	-	\$		\$ -	\$ <u>-</u>	\$	- \$	-	\$	-
19 Increase / (Decrease) in Notes Payable & Lines of Credit	\$	41,000	\$	249,000	\$	2,014,000	\$	(1,831,000)	\$ (144,000)	<u> </u>	\$	- \$	-	\$	-
20 Net Increase / (Decrease) in Long Term Debt (Including Current Maturities)	\$	-	\$	-	\$	(1,977,608)	\$	(143,891)	\$ -	<u> </u>	\$	- \$	-	\$	-
21 Increase / (Decrease) in Unapplied Payments – Cushion of Credit	\$	-	\$	-	\$	-	\$	-	\$ -	\$ <u>-</u>	\$	- \$	-	\$	-
22 Increase / (Decrease) in Other Liabilities & Deferred Credits	\$	40,000	\$	22,000	\$	73,000	\$	(135,000)	\$ -	\$ -	\$	- \$	-	\$	
23 Increase / (Decrease) in Capital Stock, Paid-in-Capital, Membership and Capital Certificates & Other Capital	\$	-	\$	-	\$	-	\$	-	\$ -	<u> </u>	\$	- \$	-	\$	-
24 Proceeds from Grant Funds	\$	-	\$	-	\$	-	\$	-	\$ 3,640,000	\$ 921,000	\$	3,975,000 \$	382,000	\$	682,000
25 Less: Distributions (Payment of Dividends, Patronage Capital Credits Retired, or any other Distribution)	\$	158,000	\$		\$	-	\$	-	\$ -	\$ -	\$	- \$	-	\$	-
26 Cash Flows from Financing Activities - Other	\$	-	\$		\$	(28,000)		(499,000)) \$	(1,075,000) \$	(1,100,000)	\$	(1,108,000)
27 Net Cash Provided / (Used) by Financing Activities	\$	296,000		,298,000	\$	81,000	_	(2,109,000)			\$	- \$	-	\$	
28 Net Increase / (Decrease) in Cash	\$	2,000		(956,000)		(46,000)	_	3,671,000			_	2,706,000 \$	4,670,000	\$	3,957,000
29 Ending Cash	\$	2,000	\$ ((956,000)	\$	(46,000)		3,671,000	\$ (5,497,000)	\$ 1,743,000	\$	2,706,000 \$	4,670,000	\$	3,957,000
30 Distributions / Net Income (Loss) (Earnings)		-117%		0%		0%									
31 Maximum Distribution Allowed							S	-	\$ 1,291,000.00	\$ 24,000.00	\$	4,382,000.00 \$	3,717,000.00	No Li	imit

GAAP Grant Accounting Information (Proceeds from Grant Funds)

	STATE	MENT OF	CASH FLOW	rs					ï
		Historical Year	2	Bridge Year			Forecast Years		
	Year 3	Year 2	Year 1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
	2020	2021	2022	2023	2024	2025	2026	2027	2028
l Beginning Cash (Cash & Equivalents plus RUS Const. Fund)	\$	\$ 2.00	0 \$ (954,000)	\$ (1.000.000)	\$ 2,671,000	\$ (2.826.000)	\$ (1.083.000)	\$ 1.623.000	
CASH FLOWS FROM OPERATING ACTIVITIES	_			(1),		. (_,,	(-)	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,,
2 Net Income (Loss)	\$ (207,000) \$ 1,620,00	597,000	\$ 5,166,000	\$ 95,000	\$ 8,765,000	\$ 4,957,000	\$ 3,347,000	\$ 3,221,000
ADJUSTMENTS TO RECONCILE NET INCOME (LOSS) TO NET CASH PROVIDED BY OPERATING	ACTIVITIES								
3 Add: Depreciation	\$ 205,00	\$ 187,00	0 \$ 565,000	\$ 588,000	\$ 916,000	\$ 1,442,000	\$ 1,680,000	\$ 1,709,000	\$ 1,719,000
4 Add: Amortization	\$	- \$	- \$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5 Other (Explain)									
CHANGES IN OPERATING ASSETS & LIABILITIES		_			_		_		
6 Decrease / (Increase) in Accounts Receivable	\$	- \$	- \$ (182,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
7 Decrease / (Increase) in Materials & Inventory	\$	- [\$	- \$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
8 Decrease / (Increase) in Other Current Assets, Interest, and Dividends Receivable	\$ (3,00) \$ (72,00	0) \$ 38,000			\$ -	\$ -	\$ -	\$ -
9 Increase / (Decrease) in Accounts Payable	\$ 15,00	\$ 401,00	0 \$ 41,000	\$ 38,000	\$ 15,000	\$ 15,000	\$ 16,000	\$ 16,000	\$ 17,000
10 Increase / (Decrease) in Other Current Liabilities	\$	- \$	- \$ 1,894			\$ -	\$ -	\$ -	\$ -
11 Net Cash Provided/(Used) by Operations	\$ 9,000	\$ 2,135,00	0 \$ (133,000)	\$ 5,753,000	\$ 1,027,000	\$ 10,222,000	\$ 6,652,000	\$ 5,073,000	\$ 4,957,000
CASH FLOWS FROM INVESTING ACTIVITIES			,	ļ					
12 Capital Expenditures (excluding plant constructed using grant proceeds)	\$ (38,00) \$ -	\$ (2,768,000)	. ,_,,	4	\$ -	\$ -
a. Plant Constructed Using Grant Proceeds	\$	- \$ (2,841,00	0)[\$ -	\$ -	\$ (3,640,000)	. (113111)	((((((((((((((((((((\$ (682,000)
13 Other Long-Term Investments	\$	- \$	- \$ -	\$ -	*	\$ -	\$ -	*	\$ -
14 Intangible Assets	\$ (272,00		0 \$ 28,000	\$ 28,000	\$ 28,000	\$ 28,000	\$ 28,000	\$ 28,000	\$ 28,000
15 Other Noncurrent Assets	\$ 7,00) \$	- \$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
16 Other (Explain)									
17 Net Cash Provided/(Used) by Investing Activities	\$ (303,000	(4,389,00	0) \$ 6,000	\$ 28,000	\$ (6,380,000)	\$ (8,479,000)	\$ (3,946,000)	\$ (403,000)	\$ (1,000,000)
CASH FLOWS FROM FINANCING ACTIVITIES			7.				r.	r. 1	,
18 Decrease / (Increase) in Notes Receivable	\$	- \$	- \$ -	*	*	\$ -	\$ -	\$ -	* -
19 Increase / (Decrease) in Notes Payable & Lines of Credit	\$ 41,00			1.7		\$ -	-	\$ -	\$ -
20 Net Increase / (Decrease) in Long Term Debt (Including Current Maturities)	\$	- \$	- \$ (1,977,608 - \$ -) \$ (143,891)	\$ -	\$ -	\$ -	\$ -	\$ -
21 Increase / (Decrease) in Unapplied Payments – Cushion of Credit	\$	- \$		\$ -	\$ -	\$ -	-	\$ -	-
22 Increase / (Decrease) in Other Liabilities & Deferred Credits	\$ 40,00	\$ 22,00	0 \$ 73,000	\$ (135,000)	\$ -	* -	-	\$ -	* -
23 Increase / (Decrease) in Capital Stock, Paid-in-Capital, Membership and Capital Certificates & Other Capital 24 Proceeds from Grant Funds	\$		- \$ - - \$	\$ -	\$ 3,640,000	\$ 921,000	\$ 3,975,000	\$ 382,000	\$ 682,000
25 Less: Distributions (Payment of Dividends, Patronage Capital Credits Retired, or any other Distribution)	\$ 158.00	4	- \$ -	\$ -	\$ 3,640,000	\$ 321,000	\$ 3,375,000		\$ 602,000
25 Less: Distributions (Fayment of Dividends, Patronage Capital Credits Retired, or any other Distribution) 26 Cash Flows from Financing Activities - Other	→ 158,00	•	- \$ - (28.000	· ·		\$ 841.000	<u> </u>	,	\$ 1,108,000
25 Cash Flows from Financing Activities - Other 27 Net Cash Provided / (Used) by Financing Activities	\$ 296,000	\$ 1,298,00	. ,	,	,		\$ 1,075,000	\$ 1,100,000	• 1,100,000
28 Net Increase / (Decrease) in Cash	\$ 2.000						+	*	\$ 3,957,000
29 Ending Cash	\$ 2,000								
30 Distributions / Net Income (Loss) (Earnings)	-117:				¥ (3,731,000)	+ 1,143,000	2,100,000	4 4,010,000	¥ 3,331,000
31 Maximum Distribution Allowed	-1112	-	07.		\$ 1,291,000.00	\$ 24,000.00	\$ 4,382,000.00	\$ 3,717,000.00	No Limit

GAAP Grant Accounting Information (Other Grants)

			INCOME S	TATEMENT						
		Historic	al Years		Bridge Year			Forecast Years		
	Year 4	Year 3	Year 2	Year 1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
1 Local Network Services Revenue	\$ 135,000	\$ 192,000	\$ 218,000	\$ 321,000	\$ 430,000	\$ 948,000	\$ 2,076,000	\$ 3,216,000	\$ 4,077,000	\$ 4,376,000
2 Network Access Services Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
3 Long Distance Network Services Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4 Carrier Billing and Collection Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5 Other Operating Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6 Amortized Grant Revenue	\$ -	\$ -	\$ -	\$ -	\$ 499,000	\$ 499,000	\$ 841,000	\$ 1,075,000	\$ 1,100,000	\$ 1,108,000
7 Uncollectible Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
8 Net Operating Revenues (Lines 1 + 2 + 3 + 4 + 5 + 6 - 7)	\$ 135,000	\$ 192,000	\$ 218,000	\$ 321,000	\$ 929,000	\$ 1,447,000	\$ 2,917,000	\$ 4,290,000	\$ 5,177,000	\$ 5,484,000
9 Plant Specific Operations Expense	\$ -	\$ -	\$ -	\$ -	\$ 67,000	\$ 99,000	\$ 200,000	\$ 300,000	\$ 325,000	\$ 350,000
10 Plant Nonspecific Operations Expense (Excluding Depreciation and Amortization)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11 Depreciation Expense	\$ 102,000	\$ 205,000	\$ 187,000	\$ 565,000	\$ 588,000	\$ 916,000	\$ 1,442,000	\$ 1,680,000	\$ 1,709,000	\$ 1,719,000
12 Amortization Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
13 Customer Operations and Corporate Operations Expenses	\$ 40,000	\$ 77,000	\$ 100,000	\$ 129,000	\$ 132,000	\$ 139,000	\$ 146,000	\$ 153,000	\$ 160,000	\$ 168,000
14 Other Operating Expense	\$ 110,000	\$ 117,000	\$ 124,000	\$ 137,000	\$ 123,000	\$ 111,000	\$ 100,000	\$ 90,000	\$ 81,000	\$ 73,000
15 Total Operating Expenses (Lines 9 through 14)	\$ 252,000	\$ 399,000	\$ 410,000	\$ 832,000	\$ 910,000	\$ 1,265,000	\$ 1,887,000	\$ 2,222,000	\$ 2,276,000	\$ 2,310,000
16 Operating Income or Margins (Line 8 less Line 15)	\$ (117,000)	\$ (207,000)	\$ (192,000)	\$ (511,000)	\$ 19,000	\$ 181,000	\$ 1,030,000	\$ 2,068,000	\$ 2,902,000	
17 Nonoperating Net Income	\$ -	\$ -	\$ (2,000)			<u> </u>				
18 Interest on Funded Debt (RUS, RTB and FFB Notes)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
19 Other Interest Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
20 Interest on Line(s) of Credit	\$ -	\$ -	\$ 27,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000
21 Allowance for Funds Used During Construction	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
22 Total Fixed Charges (18+19+20-21)	\$ -	* -	\$ 27,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000	\$ 86,000
23 Taxes	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
24 Extraordinary Items/Ohio Rurual Connect Broadband Grant			\$ 1,800,000		\$ 5,200,000					
25 Total Net Income or Margins (16 + 17 -22 - 23 + 24)	\$ (117,000)	\$ (207,000)	\$ 1,579,000	\$ (597,000)	\$ 5,133,000	\$ 2,095,000	\$ 2,344,000	\$ 3,182,000	\$ 5,116,000	\$ 5,788,000
Ž)										
26 EBITDA (11+12+25+23+22)	\$ (15,000)	\$ (2,000)	\$ 1,792,000	\$ 55,000	\$ 5,807,000	\$ 3,098,000	\$ 3,872,000	\$ 4,948,000	\$ 6,911,000	\$ 7,593,000
27 EBIT (22+23+25)	\$ (117,000)	\$ (207,000)	\$ 1,606,000	\$ (511,000)	\$ 5,219,000	\$ 2,181,000	\$ 2,430,000	\$ 3,268,000	\$ 5,202,000	\$ 5,874,000
28 Principal Payments on Long-Term Debt and Capital Leases	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$
29 TIER ((25+22) / 22))			59.48	-5.94	60.69	25.36	28.26	38.00	60.49	68.30
30 DSCR ((11+12+22+25) / (18+19+28))										
31 Network Access Services Revenue / Net Operating Revenues (2 / 8)										
Cash Flow from Operations / Total Debt Service: (Cash Flow line item 11 /										
32 (Income St. line items 18 + 19 + 28))		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
33 Revenue Trend	34.44%									
34 Operating Margin	-11.11%	-1.04%	829.63%	17.13%	625.08%	214.10%	132.74%	115.34%	133.49%	138.462
35 Operating Margin Volatility	36.75%									
36 Percentage of Non-Operating Income	0.00%	0.00%	-0.93%	0.00%						

Capital Investment Schedule Proposed Funded Service Area Costs (PFSA)

CAPI	ΓAL IN	V	ESTM	Œ	NT SO	CH	HEDU	₹			
Total Non-Depreciable Assets		\$	-	\$	25,000		-	\$ _	\$ -	\$	25,000
8. Professional Services											
a. Engineering Services										\$	-
b. Architectural Services										\$	-
c. Environmental Services										\$	-
d. Project Management Services										\$	-
e. Other (specify the type of service)										\$	-
Total Professional Services		\$	-	\$	-	\$	-	\$ -	\$ -	\$	-
9. Other Expenditures											
a. Pre-application expenses		\$	50,000	\$		\$	_	\$ _	\$ 	\$	50,000
b. Acquisition				ļ		ļ		 	 	\$	-
c. Others (Specify)										\$	-
Total Other Expenditures		\$	50,000	\$	-	\$	-	\$ -	\$ -	\$	50,000
Total Proposed Funded Service Area Costs		\$	1,782,700	\$	7,563,700	\$	4,026,500	\$ 438,000	\$ 689,100	\$	14,500,000
The Annual Capital Investment table is its own subsecti	on in Intake										
Annual Capital Investment	Total Project Cost		2024		2025		2026	2027	2028		Totals
Total Match Amount' (for 100% Grants) 'Cash Substituation											
Amount for Loan Portion' (for 50/50 Loan & Grant combo											
request)	\$ 4,900,000		2,500,000		2,400,000					\$	4,900,000
Total Loan Amount	S -									S	
Total Grant Amount	\$ 9,600,000		2,000,000		1,400,000		1,200,000	2,300,000	2,700,000	\$	9,600,000
Other Funds	S -									S	
Totals	\$ 14,500,000	\$	4,500,000	\$	3,800,000	\$	1,200,000	\$ 2,300,000	\$ 2,700,000	S	14,500,000

Capital Investment Schedule Non-Funded Service Area Costs (NFSA)

CAPI	TAL IN	VESTM	ENT SO	CHEDU.	LE		
7. Non-Depreciable Assets							
a. Land							\$ -
b. Right-of-way Procurement							\$ -
c. Others (Specify)							\$ -
Total Non-Depreciable Assets	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
8. Professional Services							
a. Engineering Services							\$ -
ь. Architectural Services							\$ -
c. Environmental Services							\$ -
d. Project Management Services							\$ -
e. Other (specify the type of service)							\$ -
Total Professional Services	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9. Other Expenditures							
a. Pre-application expenses							\$ -
b. Acquisition							\$ -
c. Others (Specify)							\$ -
Total Other Expenditures	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Non-Funded Service Area Costs	\$ 1,500,000	\$ 4,300,000	S -	S -	\$ -	S -	\$ 5,800,000

Total Capital Expenditures (*Understated*)

		STATE	MENT O	F CA	ASH FLOW	 S											
_		~ 111121	Historical Ye		1311 1 2 3 11	Bridge Year			_		Баш	X/					
		Year 3	Year 2	ars	Year 1	Year 0		Year 1	Year 2		Forecast Years Year 3				Year 5		
		2020	2021	_	2022	2023		2024	+	2025		2026	+	2027		2028	
1 Beginning Cash (Cash & Equivalents plus RUS Const. Fund)				000			0001 •			(2,826,000)		(1,083,000)		1,623,000		6,293,000	
CASH FLOWS FROM OPERATING ACTIVITIES	-		¥ 2,	000	¥ (334,000)	4 (1,000	000) 4	2,011,000	•	(2,020,000)	•	(1,003,000)	-	1,023,000	•	0,233,000	
2 Net Income (Loss)	\$	(207.000)	\$ 1,620.	nnn	\$ (597,000)	\$ 5 166	000 \$	\$ 95,000	±	8,765,000	\$	4,957,000	\$	3,347,000	£	3,221,000	
ADJUSTMENTS TO RECONCILE NET INCOME (LOSS) TO NET CASH PROVIDED BY OPERATIN	G ACTI	,,	1,020,	000	(001,000)	0,100	000 1	00,000	1 *	0,100,000	•	1,001,000		0,011,000		0,221,000	
3 Add: Depreciation	\$	205,000	\$ 187	,000	\$ 565,000	\$ 58	,000 \$	916.000	\$	1,442,000	\$	1,680,000	\$	1,709,000	\$	1,719,000	
4 Add: Amortization	\$	-	\$		\$ -	\$	- \$		\$	- 1,442,000	\$	-	\$	-	\$	-	
5 Other (Explain)					•		Ť		<u> </u>		•				_		
CHANGES IN OPERATING ASSETS & LIABILITIES																	
6 Decrease / (Increase) in Accounts Receivable	\$	-	\$	-	\$ (182,000)	\$	- \$	-	\$	-	\$	-	\$	-	\$	-	
7 Decrease / (Increase) in Materials & Inventory	\$	-	\$	-	\$ -	\$	- \$	-	\$	-	\$	-	\$	-	\$	-	
8 Decrease / (Increase) in Other Current Assets, Interest, and Dividends Receivable	\$	(3,000)	\$ (72	(000,	\$ 38,000	\$ (3)	(000,	-	\$	-	\$	-	\$	-	\$	-	
9 Increase / (Decrease) in Accounts Payable	\$	15,000	\$ 401	,000	\$ 41,000	\$ 31	,000 \$	15,000	\$	15,000	\$	16,000	\$	16,000	\$	17,000	
10 Increase / (Decrease) in Other Current Liabilities	\$	-	\$	-	\$ 1,894	\$ (,894) \$	-	\$	-	\$	-	\$	-	\$	-	
11 Net Cash Provided/(Used) by Operations	\$	9,000	\$ 2,135,	000	\$ (133,000)	\$ 5,753	000 \$	1,027,000	\$	10,222,000	\$	6,652,000	\$	5,073,000	\$	4,957,000	
CASH FLOWS FROM INVESTING ACTIVITIES										·							
12 Capital Expenditures (excluding plant constructed using grant proceeds)	\$	(38,000)	\$ (1,555	,000)	\$ (23,000)	\$	- \$	(2,768,000)) \$	(2,686,000)	\$	-	\$	_	\$	-	
a. Plant Constructed Using Grant Proceeds	\$	-	\$ (2,841	(000,	\$ -	\$	- \$	(3,640,000)) \$	(921,000)	\$	(3,975,000)	\$	(382,000)	\$	(682,000)	\$ (15,0
13 Other Long-Term Investments	\$	-	\$	-	\$ -	\$	- \$	-	\$	-	\$	-	\$	-	\$	-	
14 Intangible Assets	\$	(272,000)	\$ 7	,000	\$ 28,000	\$ 2	,000 \$	28,000	\$	28,000	\$	28,000	\$	28,000	\$	28,000	
15 Other Noncurrent Assets	\$	7,000	\$	-	\$ -	\$	- \$	-	\$	-	\$	-	\$	-	\$	-	
16 Other (Explain)																	
17 Net Cash Provided/(Used) by Investing Activities	\$	(303,000)	\$ (4,389,	000)	\$ 6,000	\$ 28	000 \$	(6,380,000)) \$	(8,479,000)	\$ (3,946,000)	j \$	(403,000)	\$	(1,000,000)	
CASH FLOWS FROM FINANCING ACTIVITIES			_														
18 Decrease / (Increase) in Notes Receivable	\$	-	\$	[\$ -	\$	- \$	<u></u>	\$	-	\$	-	\$	-	\$	-	
19 Increase / (Decrease) in Notes Payable & Lines of Credit	\$	41,000	\$ 249	,000	\$ 2,014,000		\$ (000,) \$	-	\$	-	\$	_	\$	-	
20 Net Increase / (Decrease) in Long Term Debt (Including Current Maturities)	\$	-	\$	-	\$ (1,977,608)	\$ (14	3,891) \$	-	\$	-	\$	-	\$	-	\$	-	
21 Increase / (Decrease) in Unapplied Payments – Cushion of Credit	\$	-	\$		\$ -	\$	- \$	-	\$	-	\$	-	\$	-	\$	-	
22 Increase / (Decrease) in Other Liabilities & Deferred Credits	\$	40,000	\$ 22	,000	\$ 73,000	\$ (13)	\$ (000)	-	\$	-	\$	-	\$	-	\$	-	
23 Increase / (Decrease) in Capital Stock, Paid-in-Capital, Membership and Capital Certificates & Other Capital	\$	-	\$	-	\$ -	\$	- \$	-	\$	-	\$	-	\$	-	\$	-	
24 Proceeds from Grant Funds	\$	-	\$	-	\$ -	\$	- \$	0,010,000	\$	921,000	\$	3,975,000	\$	382,000	\$	682,000	
25 Less: Distributions (Payment of Dividends, Patronage Capital Credits Retired, or any other Distribution)	\$	158,000	\$	-	\$ -	\$	- \$	<u> </u>	\$	-	\$	-	\$	-	\$	-	
26 Cash Flows from Financing Activities - Other	\$	-	\$	-	\$ (28,000)		\$ 000,	,	+ -	841,000	\$	1,075,000	\$	1,100,000	\$	1,108,000	
27 Net Cash Provided / (Used) by Financing Activities	\$	296,000		-	•		000) \$		_	-	\$		\$		\$	-	
28 Net Increase / (Decrease) in Cash	\$	2,000					000 \$		_	1,743,000		2,706,000	_	4,670,000		3,957,000	
29 Ending Cash	\$	2,000	\$ (956,			\$ 3,671	000 \$	(5,497,000)) \$	1,743,000	\$	2,706,000	\$	4,670,000	\$	3,957,000	
30 Distributions / Net Income (Loss) (Earnings)		-117%		0%	0%	•					•	200 000 00	-				
31 Maximum Distribution Allowed						S	- S	1,291,000.00	S	24,000.00	S 4	,382,000.00	S	3,717,000.00	No Li	mit	

Total Capital Expenditures (Accurately Reflected)

										_						
		STATE	MEN	T OF CA	ASH FI	LOW	S									
			Histor	rical Years			Bridge Yea					Forecast	Years			
		Year 3	Y	Year 2	Year	1	Year)	Year 1		Year 2	Year	.3	Year 4	Year 5	
		2020	2	2021	2022	2	2023		2024		2025	202	6	2027	2028	
l Beginning Cash (Cash & Equivalents plus RUS Const. Fund)	\$	-	\$	2,000	\$ (95	54,000)	\$ (1,00	(000,0	\$ 2,671,00	10 \$	(2,826,000)	\$ (1,0	83,000)	\$ 1,623,000	\$ 6,293,000)
CASH FLOWS FROM OPERATING ACTIVITIES																_
2 Net Income (Loss)	\$	(207,000)	\$	1,620,000	\$ (53	97,000)	\$ 5,16	000,8	\$ 95,00	10 \$	8,765,000	\$ 4,9	57,000	\$ 3,347,000	\$ 3,221,000)
ADJUSTMENTS TO RECONCILE NET INCOME (LOSS) TO NET CASH PROVIDED BY OPERATIN	G ACTI															╛
3 Add: Depreciation	\$	205,000	\$	187,000	\$!	565,000	\$ 5	88,000	\$ 916,00	00 \$	1,442,000	\$ 1,	.680,000	\$ 1,709,000	\$ 1,719,000	
4 Add: Amortization	\$	-	\$	-	\$	-	\$	- 1	\$	- \$	-	\$	- :	\$ -	\$ -	_
5 Other (Explain)																4
CHANGES IN OPERATING ASSETS & LIABILITIES				,			_									\perp
6 Decrease / (Increase) in Accounts Receivable	\$	-	\$	-	\$ ((182,000)	\$	- 3	\$	- \$	-	\$	- ;	\$ -	\$	_
7 Decrease / (Increase) in Materials & Inventory	\$	(3,000)	\$	(72,000)	\$	38.000	\$	- 3 37.0001 \$	\$	- \$	-	\$	- ;	\$ -	\$	_
8 Decrease / (Increase) in Other Current Assets, Interest, and Dividends Receivable	\$	15,000		401,000		41,000		37,000) 3 38,000 4	-	- \$ 00 \$	15,000	\$	40,000	\$ -	\$ 17,000	\exists
9 Increase / (Decrease) in Accounts Payable 10 Increase / (Decrease) in Other Current Liabilities	\$	15,000	\$	401,000	*	1.894	*	(1.894) \$	\$ 15,UL	JU \$	15,000	*	16,000 [\$ 16,000	\$ 17,000	4
10 Increase / (Decrease) in Other Current Liabilities 11 Net Cash Provided/(Used) by Operations	\$	9.000	\$	2,135,000	\$ • (1'	33,000)	\$ ★ E7E	3,000	\$ 1,027,00	- \$	10,222,000	\$ CC	52,000	\$ 5,073,000	\$ 4,957,000	
CASH FLOWS FROM INVESTING ACTIVITIES	•	3,000	1 +	2,135,000	→ (15	33,000)	→ 5,15	3,000 •	→ 1,021,00	IU *	10,222,000	→ 0,0	32,000	→ 3,013,000	¥ 4,351,000	4
12 Capital Expenditures (excluding plant constructed using grant proceeds)	\$	(38,000)	*	(1.555,000)	\$	(23,000)	\$	- 3	\$ (2.768.00	nm &	(2,686,000)	\$ (5	246.0001	* -	*	
a. Plant Constructed Using Grant Proceeds	***	(30,000)	\$	(2,841,000)	\$	(23,000)	<u>*</u>	- 8	. (=,,		(921,000)		975,000)	<u> </u>	1 \$ (682,000	o s
13 Other Long-Term Investments	\$	_	\$	-	\$	_	\$	- 8	\$	- \$	-	\$	- 1	\$ -	\$ -	-
14 Intangible Assets	\$	(272,000)	\$	7.000	\$	28,000	\$	28.000 3	\$ 28,00	00 \$	28.000	\$	28,000	\$ 28,000	\$ 28,000	
15 Other Noncurrent Assets	\$	7,000		-	\$	-	\$	- 1	\$	- \$	-	\$	- :	\$ -	\$ -	-
16 Other (Explain)																
17 Net Cash Provided/(Used) by Investing Activities	\$	(303,000)	\$ ((4,389,000)	\$	6,000	\$ 2	B,000 =	\$ (6,380,00	10) \$	(8,479,000)	\$ (3,9	46,000)	\$ (403,000	\$ (1,000,000))
CASH FLOWS FROM FINANCING ACTIVITIES																
18 Decrease / (Increase) in Notes Receivable	\$	-	\$	-	\$	-	\$	- 1	\$	- \$	-	\$	- :	\$ -	\$ -	-
19 Increase / (Decrease) in Notes Payable & Lines of Credit	\$	41,000	\$	249,000	\$ 2,	.014,000	\$ (1,8	31,000) \$	\$ (144,00	30) \$	-	\$	- :	\$ -	\$ -	-
20 Net Increase / (Decrease) in Long Term Debt (Including Current Maturities)	\$	-	\$	-	\$ (1,5	977,608)	\$ (43,891) \$	\$	- \$	-	\$	- :	\$ -	\$ -	_
21 Increase / (Decrease) in Unapplied Payments – Cushion of Credit	\$	-	\$	-	\$	-	\$	- 4	\$	- \$	-	\$	- :	\$ -	\$ -	_
22 Increase / (Decrease) in Other Liabilities & Deferred Credits	\$	40,000	\$	22,000	\$	73,000	\$ (1	35,000) \$	\$	- \$	-	\$	- 1	\$ -	\$ -	_
23 Increase / (Decrease) in Capital Stock, Paid-in-Capital, Membership and Capital Certificates & Other Capital	\$	-	\$	-	\$	-	\$	- 4	\$	- \$	-	\$	- :	\$ -	\$ -	_
24 Proceeds from Grant Funds	\$	-	\$	-	\$	-	\$	- \$	\$ 3,640,00	30 \$	921,000	\$ 3,	975,000 :	\$ 382,000	\$ 682,000	
25 Less: Distributions (Payment of Dividends, Patronage Capital Credits Retired, or any other Distribution)	\$	158,000	\$	-	\$	-	\$	- 4	\$	- \$	-	\$	- :	\$ -	\$ -	_
26 Cash Flows from Financing Activities - Other	\$	-	\$			(28,000)		39,000 4			841,000	\$ 1,	.075,000	\$ 1,100,000	\$ 1,108,000	D
27 Net Cash Provided / (Used) by Financing Activities	\$	296,000		1,298,000		81,000		9,000) :	\$ (144,00	_	-	\$	- :	\$ -	\$ -	-
28 Net Increase / (Decrease) in Cash	\$	2,000	_	(956,000)	-	46,000)		1,000	\$ (5,497,00					\$ 4,670,000		_
29 Ending Cash	\$	2,000	\$	(956,000)	\$ (4	46,000)	\$ 3,67	1,000	\$ (5,497,00	(0)	1,743,000	\$ 2,7	000,00	\$ 4,670,000	\$ 3,957,000)
30 Distributions / Net Income (Loss) (Earnings)		-117%		0%		0%	^							0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	N 71 1	
31 Maximum Distribution Allowed							8	- 5	\$ 1,291,000.0)0 S	24,000.00	\$ 4,382	2,000.00	\$ 3,717,000.00	No Limit	



- The Capital Investment Schedule has more costs listed (including the PFSA and NFSA) than total Capital Expenditures on the Statement of Cash Flows.
- Capital Expenditures on the Statement of Cash Flow are not "equal to" or "more than" the amounts listed on the Capital Investment Schedule (between the PFSA and the NFSA costs).
- Deferred Grant Revenue is entered by the Applicant on the Balance Sheet, but Amortized Grant Revenue is not entered on the Income Statement (if using the Deferred Revenue Recognition Method).
- Amortized Grant Revenue is not entered by the Applicant on the Income Statement, if using the Deferred Revenue Recognition Method or the Immediate Revenue Recognition Method.
- There is no "offsetting entry" to amortized grant revenue on the Statement of Cash Flows, if using the Deferred Revenue Recognition Method or the Immediate Recognition Method.
- Grant funds associated with the current ReConnect Round are not reported on the Plant Constructed Using Grant Proceeds line item, located on the Statement of Cash Flows.
- Previous ReConnect grants are listed as Non-Operating Net Income, instead of Proceeds from Grant Funds on the Statement of Cash Flows.
- The Plant Constructed Using Grant Proceeds and Proceeds from Grant Funds line items do not zero each other out (unless the offsetting entry to Amortized Grant Revenue is included within the Proceeds from Grant Funds line item).

Additional Resources

□ USDA ReConnect Loan and Grant Program

- ☐ ReConnect Round 5 Webinar Materials
- □ ReConnect Program Contact Us
- ☐ Universal Service Administrative Co. (USAC)

Contact:



Randall Millhiser

Loan Origination and Approval Division

Deputy Assistant Administrator

randall.millhiser@usda.gov

La'Kenya Walter

Loan Origination and Approval Division

Operations Branch Chief

lakenya.walter@usda.gov

Theresa Anim

Loan Origination and Approval Division

Financial Loan and Business Specialist

theresa.anim@usda.gov

Timothy Frantz

External Compliance Division

Chief, Northeastern Accounting Branch

timothy.frantz@usda.gov

Christopher Colberg

External Compliance Division

Chief, Western Accounting Branch

chris.colberg@usda.gov

Collin Holston

Contractor

Team Lead - Financial Reviewer

collin.holston@usda.gov

THANK THANK







ReConnect Round 5 Evaluation Criteria and Application Submission

Agenda

- Evaluation Criteria
- Summary and Submit
- Q&A



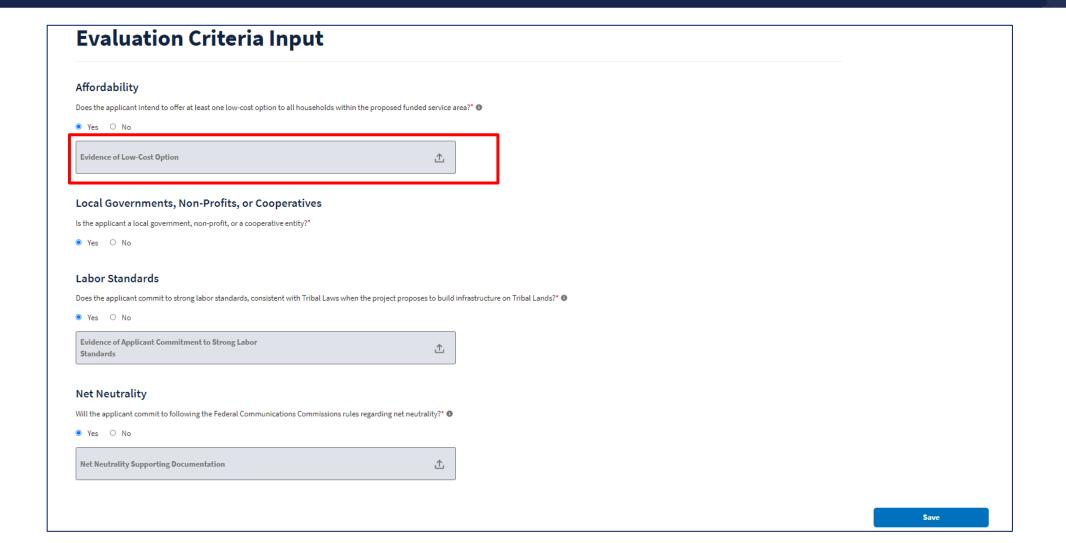
Evaluation Criteria



Evaluation Criteria



Evaluation Criteria (continued)



Evaluation Criteria – Affordability (20 points)

- Document upload requirements:
 - Provide documentation that broadband prices offered are affordable for the targeted markets.
 - Information on the pricing and speed tiers to be offered
 - Must include at least one low-cost option offered at speeds that are sufficient for a household with multiple users to simultaneously telework and engage in remote learning
- Reminder: Participation in the Affordable Connectivity Program before award funds are disbursed will be enforceable under the legal agreement associated with an award.

Evaluation Criteria – Local Governments, Non-Profits, or Cooperatives (15 points)

Requirements:

- The applicant will identify their entity type when creating their account and completing account information.
- Documents uploaded in the account documents section should support the entity type selected.
- Projects involving public-private partnerships where the local government, non-profit, or cooperative is the applicant can also receive these points

Evaluation Criteria – Labor Standards (20 points)

- Document upload requirements:
 - Include a description of whether and, if so, how the project will:
 - 1. Incorporate strong labor standards
 - Demonstrate compliance with and future compliance with labor and employment laws
 - 3. Plan to recruit and support an appropriately skilled, trained, and credentialed workforce (including by contractors and subcontractors)

Evaluation Criteria – Labor Standards (continued)

- Commitment to strong labor standards that are consistent with Tribal Laws when the project proposes to build infrastructure on Tribal Lands
- Projects on Tribal Lands must follow Tribal Laws such as Tribal Employment Rights Ordinances to be in compliance with a ReConnect award, regardless of receiving points.

Evaluation Criteria – Net Neutrality (10 points)

- Document upload requirements:
 - A board resolution or its equivalent committing that the applicant's networks shall not:
 - 1. Block lawful content, applications, services, or non-harmful devices, subject to reasonable network management;
 - Impair or degrade lawful Internet traffic on the basis of Internet content, application, or service, or use of a non-harmful device, subject to reasonable network management; and
 - 3. Engage in paid prioritization, meaning the management of a broadband provider's network to directly or indirectly favor some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, resource reservation, or other forms of preferential traffic management, either (a) in exchange for consideration (monetary or otherwise) from a third party, or (b) to benefit an affiliated entity.

Evaluation Criteria Summary



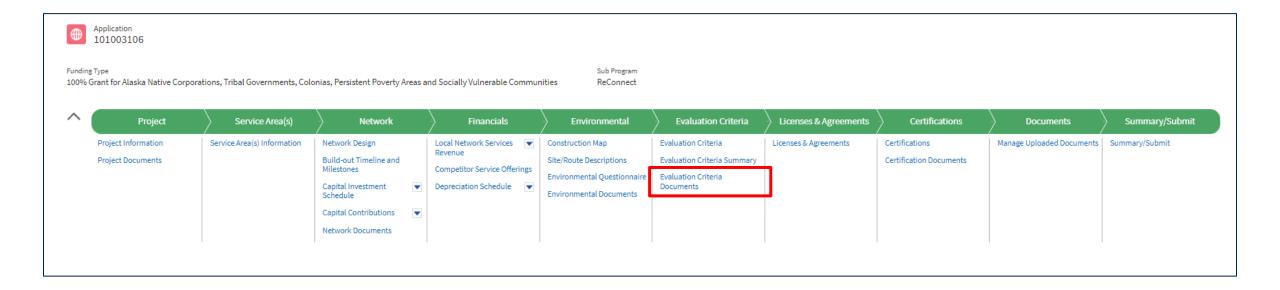
Evaluation Criteria Summary (continued)

Evaluation Criteria Summary

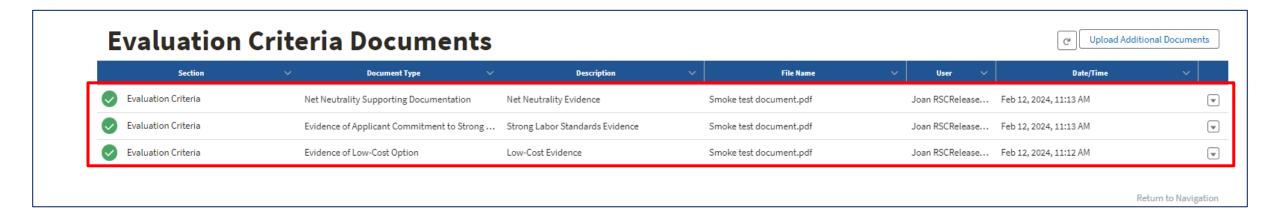
EVALUATION CRITERIA	INPUT VALUES	SCORE
Does the applicant intend to offer at least one low-cost option to all households within the proposed funded service area?	Yes	20 / 20
Is the applicant a local government, non-profit, or a cooperative entity?	Yes	15 / 15
Does the applicant commit to strong labor standards, consistent with Tribal Laws when the project proposes to build infrastructure on Tribal Lands?	Yes	20 / 20
Will the applicant commit to following the Federal Communications Commissions rules regarding net neutrality?	Yes	10/10
Rurality of Proposed Funded Service Area	2.34	25 / 25
Tribal Lands	0.00 %	- / -
Hibdt Ballus	0.00 %	0 / 15
Economic Need of Community	100.00 %	0/15
		·

Preliminary Total Score 1 Service Areas Considered

Evaluation Criteria Documents



Evaluation Criteria Documents (continued)

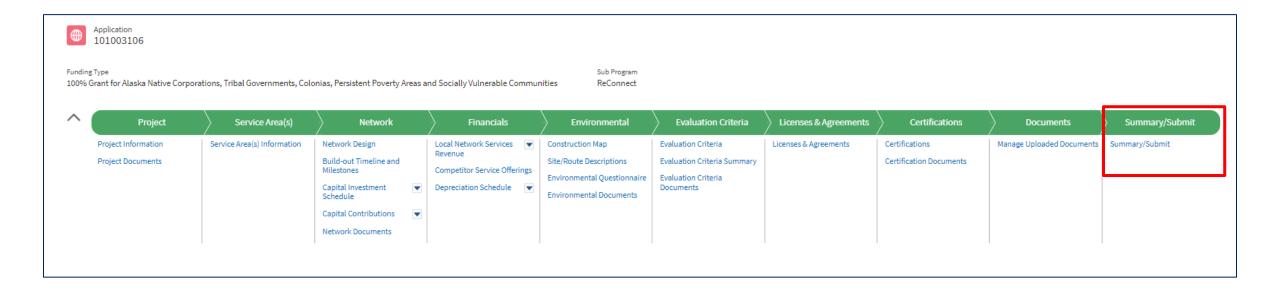




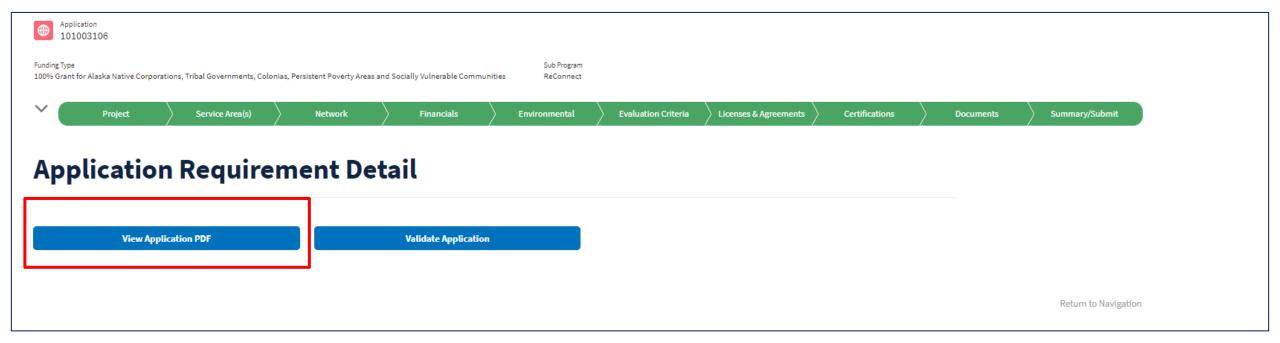
Summary/Submit

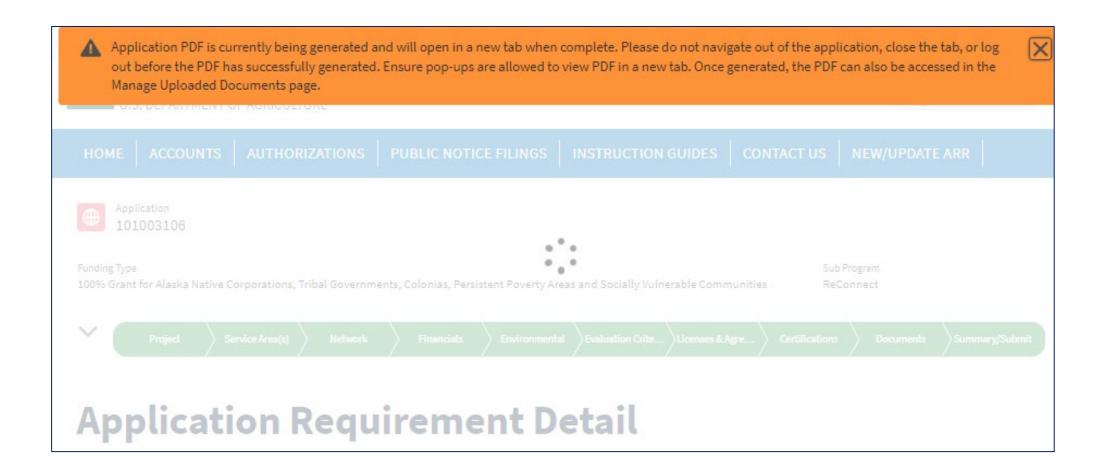


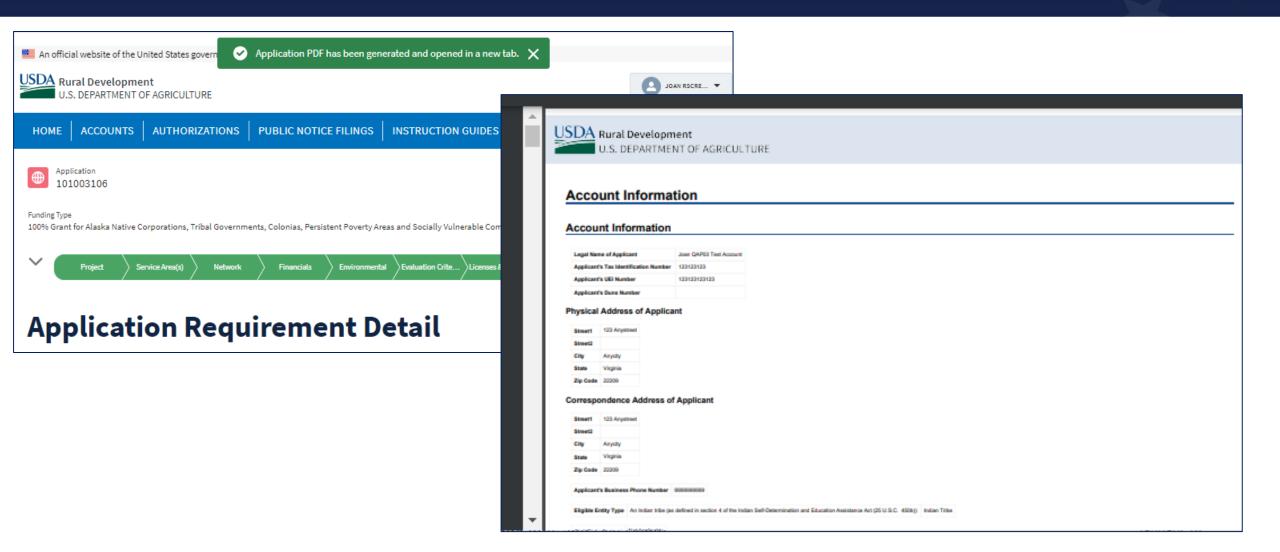
Summary/Submit

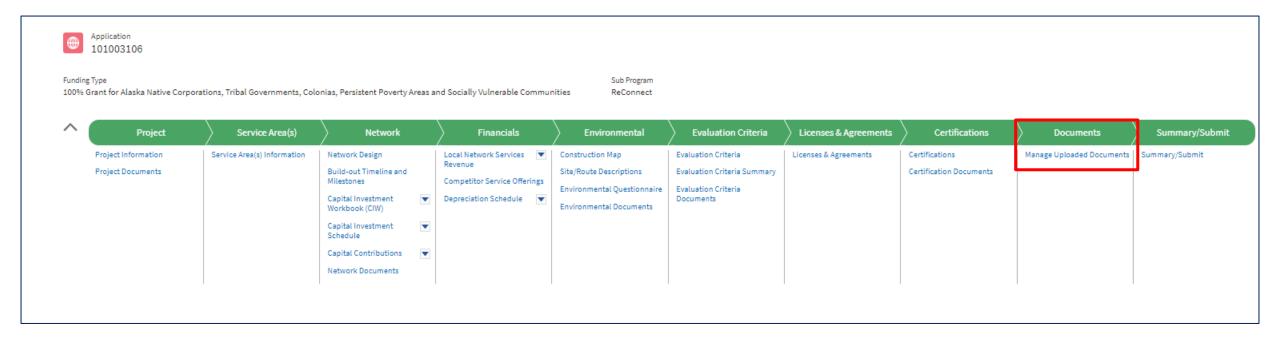


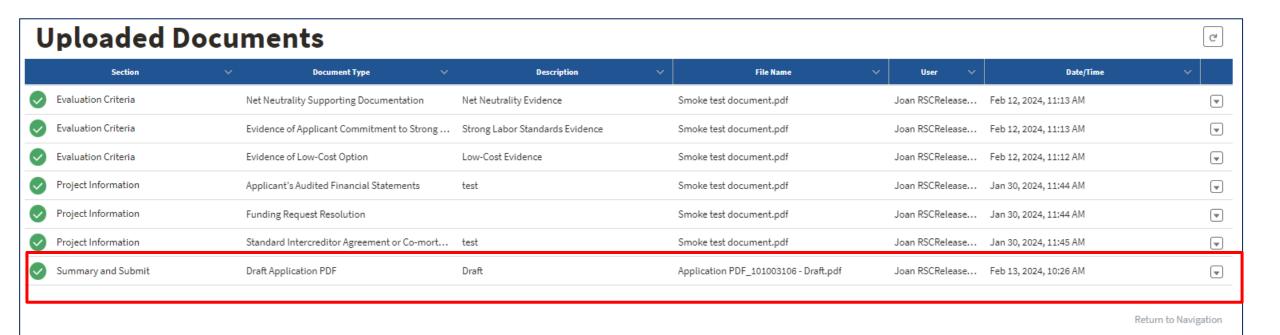
Summary/Submit – View Application PDF



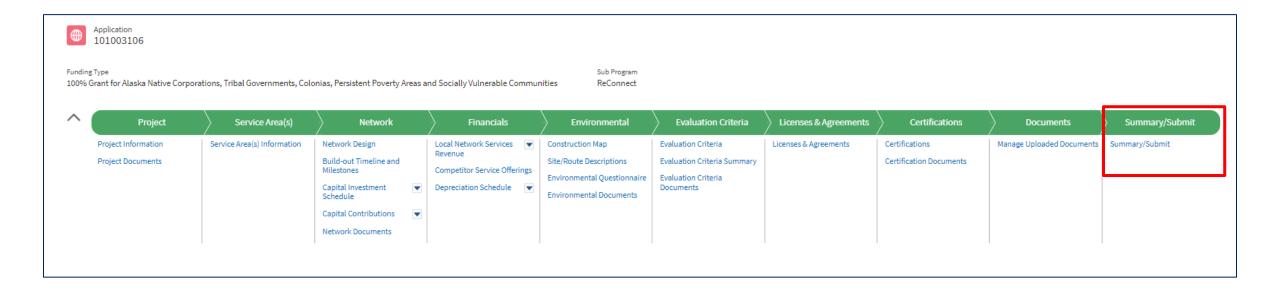




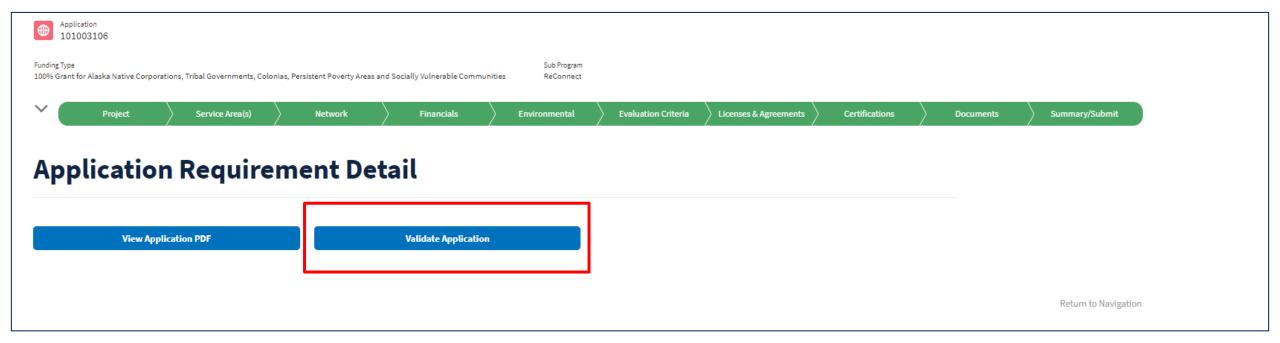




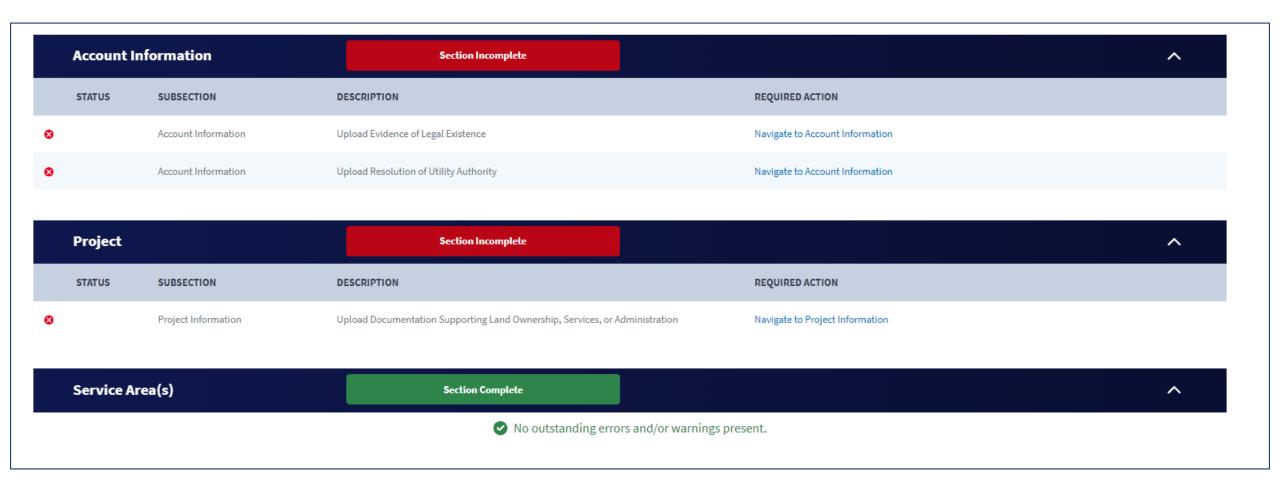
Summary/Submit



Summary/Submit (continued)



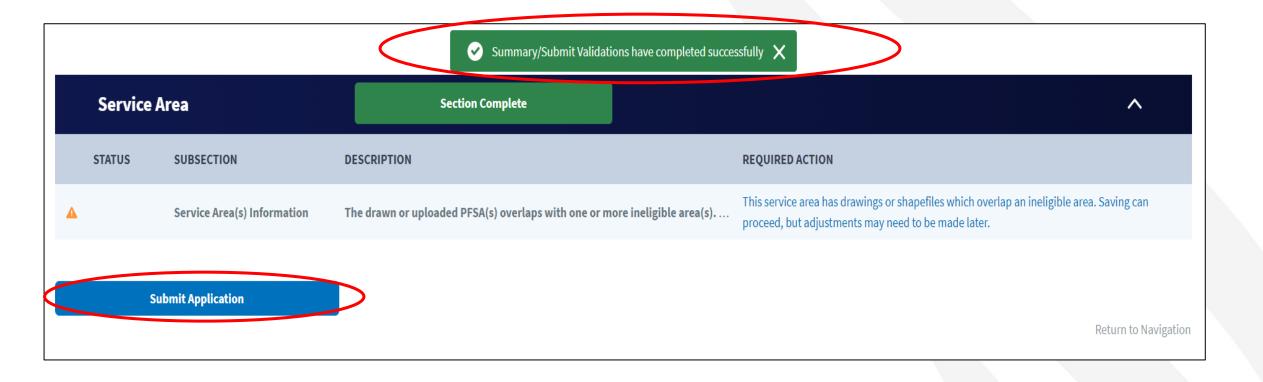
Summary/Submit – Validate Application



Summary/Submit – Validate Application (continued)

A	CIW - Common Network Facilities Costs	You have not saved any assets for the CIW - Common Network Facilities (PFSA)	Navigate to CIW - Common Network Facilities Costs
Δ	CIW - Other Costs	You have not saved any assets for the CIW - Other Costs (PFSA)	Navigate to CIW - Other Costs

Summary/Submit – Submit Application



Summary/Submit – Submit Application (continued)









Early Coordination with Tribes

USDA RUS ReConnect Program





Natalie Kovach

General Field Representative (Alaska)

Agenda

- Introduction to RD: Structure and Roles
- Introduction to Indian Country and Tribal Lands
- ReConnect Program Tribal Considerations
- Additional Regulatory Requirements
- Guiding Principles
- Recommendations
- Additional Resources

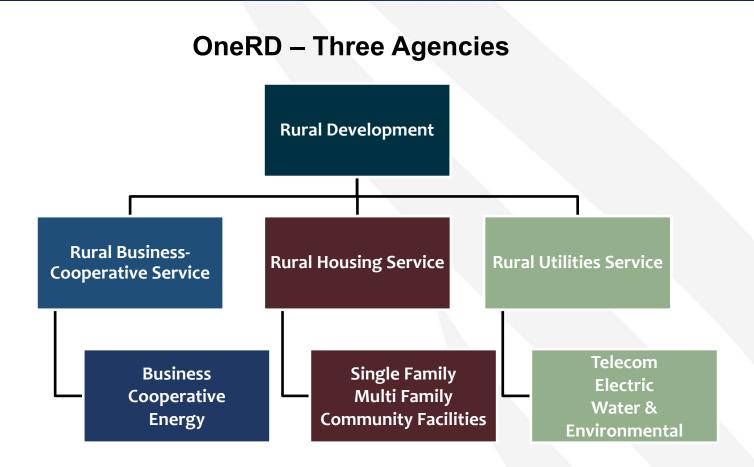
Introduction to RD: Structure and Roles

Leadership

- Under Secretary
- Deputy Under Secretary
- Administrators
- State Directors

Offices

- 47 State Offices
- 400 Area Offices
- National Office in DC



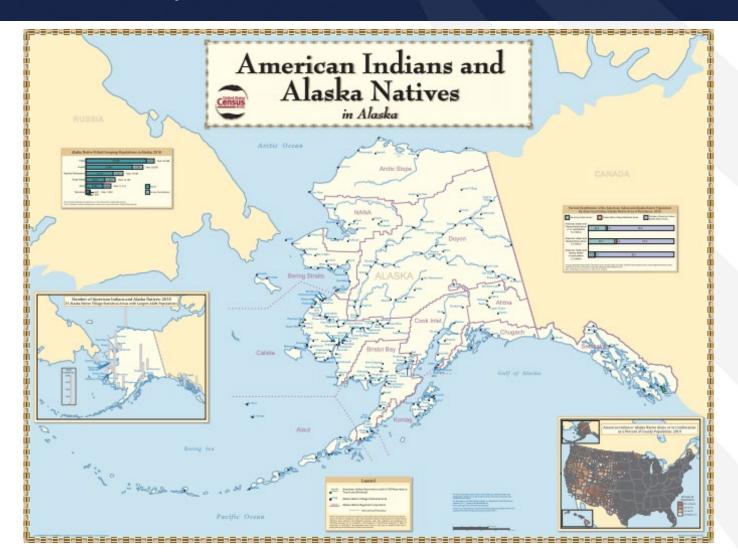
Introduction to Indian Country and Tribal Lands Tribal Nations - Precontact



Introduction to Indian Country and Tribal Lands Al/AN in the U.S. Wall Map



Introduction to Indian Country and Tribal Lands Al/AN in Alaska Wall Map



Multiple Tribal Stakeholders Within Every Tribe

- Elected Tribal Leaders
- Tribal Historic Preservation Office
- Tribal IT Department
- Tribal Economic Development Staff
- Tribal Utility Staff
- Other Tribal Programs (Natural Resources, Land Management, etc.)
- Tribal Members





Additional Regulatory Requirements



Regardless of whether or not you are proposing to cross tribal lands, as soon as you accept funds from Rural Development you must comply with the National Environmental Policy Act (NEPA) and RD's implementing regulations prior to drawing down funds and prior to construction.

- Includes compliance with Section 106 of the National Historic Preservation Act and requirement for RD to consult with Tribes
- BIA Rights of Way Regulations when crossing tribal lands
 - https://www.bia.gov/as-ia/raca/rights-way-25-cfr-169
- Other potential challenges

Additional Regulatory Requirements



"The National Historic Preservation Act (NHPA) requires federal agencies, in carrying out the Section 106 process, to consult with Indian tribes and Native Hawaiian organizations (NHOs) when historic properties of religious and cultural significance to them may be affected by a project that they carry out, license, or financially assist (also referred to as an undertaking). The ACHP's regulations implementing Section 106, 36 C.F.R. Part 800, in turn, require federal agencies to consult with Indian tribes and NHOs throughout the review process for such projects. This requirement applies regardless of the location of the historic property."

From Early Coordination With Indian Tribes During Pre-application Processes – A Handbook. Published by the ACHP

Guiding Principles: Federal Infrastructure Funding On Tribal Lands And In Indigenous Communities

These principles are designed to aid federal agencies in designing and improving programs that fund infrastructure projects involving Tribal Nations, Tribal Lands, and indigenous peoples.

1. Require Tribal Resolutions Of Support.

 Require any applicant seeking funds to build infrastructure on **Tribal Lands** to have a Resolution of Support from the appropriate Tribal Government in order to be eligible to receive those funds.

2. Require Compliance With Tribal Law.

o Include language requiring compliance with tribal laws and regulations in loan and grant agreements with all borrowers, including non-Tribal. Enforce the terms of loan and grant agreements that fail to comply with tribal laws and regulatory bodies.

Guiding Principles: Federal Infrastructure Funding On Tribal Lands And In Indigenous Communities (continued)

4. Do Not Limit Tribal Self-government.

 Infrastructure program requirements cannot require sovereign Tribal Nations to abrogate their self-government powers, such as the power to regulate and govern.

5. Allow Flexibility.

 Read ambiguous statutory requirements as flexibly as possible and in favor of Tribal Nations

6. Directly Fund Tribal Governments.

 Where statutory language allows flexibility, do not require Tribal Nations to apply for funding through state governments. Allocate funds directly to Tribal Governments or create a federally administered fund for Tribal Nations.



Recommendations

- Utilize RD staff expertise
- Understand the land tenure of proposed service territory
- Start building relationship of mutual trust and respect as soon as possible
- Approach Tribes with respect as partners, custodians of a unique cultural heritage, landowners and sovereign nations
- Be prepared to work with BIA and tribal land management staff if your project will cross tribal lands

Resources

Advisory Council on Historic Preservation (ACHP)

- On-line Training Resources
 - https://www.achp.gov/training/elearning
- Early Coordination Handbook
 - www.achp.gov/sites/default/files/documents/2019-10/EarlyCoordinationHandbook 102819 highRes.pdf

Department of Housing and Urban Development (HUD)

Tribal Directory Assessment Tool - https://egis.hud.gov/TDAT/

USDA Rural Development Regulations & Guidance

- PART 1970—ENVIRONMENTAL POLICIES AND PROCEDURES
 - https://www.ecfr.gov/cgi-bin/text-idx?SID=2d8457de87c022d0e240337e369f665f&mc=true&node=pt7.14.1970&rgn=div5
- Subpart H Historic and Cultural Resources Instruction
 - https://www.rd.usda.gov/sites/default/files/1970h.pdf



Rural Development