CA-23-02, Leveraging Assistance Listings and Financial Assistance Award Descriptions to Help Meet Statutory Broadband Reporting

Controller Alerts are designed to highlight emerging financial management issues that may require agency attention or action. These Alerts are intended to inform the Chief Financial Officer (CFO) community of key issues where the Office of Management and Budget (OMB) believes further action may be warranted, but do not constitute official guidance or prescribe specific tasks for agencies beyond consideration of appropriate steps to address the issue.

The purpose of this Controller Alert is to promote the fullest use of Assistance Listings and financial assistance award descriptions to minimize agencies’ broadband reporting burdens in satisfying the Advancing Critical Connectivity Expands Service, Small Business Resources, Opportunities, Access, and Data Based on Assessed Need and Demand Act (ACCESS BROADBAND Act) and the Infrastructure Investment and Jobs Act (IIJA).

Assistance Listings serve as the announcement and public-facing policy statement of each program (per 2 CFR 200.203). They are an important communication tool to the public on the overall goals and objectives of the program. Existing guidance directs agencies to create an Assistance Listing in SAM.gov for each financial assistance program. In addition, 2 CFR 200 requires:

A brief summary of the statutory or regulatory requirements of the program and its intended outcome. Where appropriate, the Program Description, Purpose, Goals, and Measurement should align with the Congressional intent of the program, the strategic goals and objectives within the Federal awarding agency's performance plan, and should support the Federal awarding agency's performance measurement, management, and reporting as required by Part 6 of OMB Circular A-11.

Consistent with existing guidance and statutory requirements, agencies with programs intended to support broadband planning, deployment, and/or digital inclusion/ adoption (see below for the definition of these broadband categories) are encouraged to review their Assistance Listings and provide updates as appropriate to ensure the Assistance Listing purpose, goals, and objectives appropriately reflect these broadband-specific priorities and projects.

In addition, the Financial Assistance award description can provide particularly useful information about the intended impact of Federal spending. OMB Memorandum M-21-20, Promoting Public Trust in the Federal Government through Effective Implementation of the American Rescue Plan Act and Stewardship of the Taxpayer Resources explains:

Award descriptions are critical to ensuring accountability and transparency, as they are a primary means to inform the public of the purpose of the
Federal funding that is distinct from the programmatic level information in the Assistance Listings. **Agencies shall establish processes to validate that award descriptions provide specificity about the award purpose, activities to be performed, deliverables and expected outcomes, and intended beneficiary(ies) as well as subrecipient activities if known or specified at the time of award.**

Consistent with that guidance, agencies that are issuing financial assistance are encouraged to incorporate into their award descriptions the specific language below (in bold) when making awards where broadband (including broadband planning, deployment, and/or digital inclusion/adoption) is at least 51 percent of the planned purpose of the award. Agencies that incorporate this language into their award descriptions will provide useful information to the public and support a data-centric effort to meet existing broadband reporting requirements while minimizing the effort needed to respond to manual data calls.

Language that agencies are encouraged to use in an award description when broadband is at least 51 percent of the planned purpose of an award includes:

- **Broadband Infrastructure Deployment**
- **Broadband Digital inclusion or adoption**
- **Broadband Planning, Data, or Mapping**

These categories are defined as:

- **Broadband Infrastructure Deployment** – Refers to infrastructure development for high-speed transmission technologies, such as fiber, wireless, satellite, digital subscriber line, and cable, and may include last-mile and middle mile deployments. Since part of an award description includes expected outcomes, agencies are also encouraged to include in the award description the number of households and/or businesses that will be served as a result of the award.

- **Broadband Digital Inclusion or Adoption** – Refers to the activities necessary to ensure that all individuals and communities, including the most disadvantaged, have access to and use of broadband internet access service. It includes: Internet service subsidies; devices and equipment funding; public computer and Internet access funding; digital literacy, skills training, and workforce development training; teledicine funding; and remote learning funding.

- **Broadband Planning, Data, or Mapping** – Refers to funding for the planning of broadband initiatives (e.g., feasibility studies), or for capturing or plotting data on broadband deployment, availability, adoption, or usage. Note that this does not refer to a program’s own operational costs related to planning, data, or mapping.

For additional information on how to write a strong award description please refer to, *Controller Alert: Award Description Data Quality for Financial Assistance Awards on CFO.gov.*

If you have questions regarding this Controller Alert, please direct them to [MBX.OMB.SpendingTransparency@OMB.eop.gov](mailto:MBX.OMB.SpendingTransparency@OMB.eop.gov)

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