

Fixed Amount Subaward Milestones, Required Documentation, and Disbursement Process

Version 1, as of September 14, 2026

The Illinois Office of Broadband (IOB) has implemented fixed amount subawards (FASA) for Broadband Equity Access and Deployment (BEAD) Program grantees. Disbursement of BEAD funds for all grantees will be based on evidence of the completion of a series of defined milestones (as opposed to reimbursement of specifically incurred costs based on transaction-level documentation). Payments will be made based on grantees (1) completing each milestone, (2) providing the required documentation of completion to IOB, and (3) IOB's review and acceptance of milestone documentation.

This document contains:

- [Fixed Amount Subaward Milestones](#)
 - [Specific documentation required for evidence of milestone completion for disbursement](#)
- [Definitions](#)
- [Disbursement of grant funds](#)

Fixed Amount Subaward Milestones

Achieving the milestones listed in the table below along with providing the associated documentation is required for grantees to receive disbursement of grant funds.

- Milestones are separated into 3 phases: Pre-Deployment, Deployment, and Reporting.
- Payments will only be made when a grantee has provided the specified documentation to substantiate completion of each milestone.
- Milestones and corresponding payments are determined on a per-project basis. A project is defined as each unique BOTB-ID.
- While some grantees have more than one BOTB project in their grant agreement, the fixed amount subaward is applied at the project level. This means that when a milestone is complete and verified, IOB will facilitate disbursement of the portion of project award attributed to that milestone (e.g., signing the grant agreement unlocks 5% of the project's grant award)
- No disbursements will be made until milestone #1 (Grant agreement signed) is complete.
- Deployment milestones cannot begin until milestones #1-4 are complete, and completion of milestone #5 for the associated NEPA sub-project.



Pre-Deployment Phase¹

#	Milestone	Documentation needed to substantiate milestone	Milestone is complete and payment disbursed when...	Payment Attributed to Milestone
1	Grant agreement signed	Fully executed grant agreement between grantee and DCEO.	IOB has a fully executed grant agreement.	5%
2	Project plan completed	Complete project timeline using the IOB-provided template, aligned with the project completion commitment from the grant application.	IOB has reviewed and approved grantee-provided project timeline.	5%
3	Network design completed	Completed network design, Professional Engineer (PE) certification, and nodes CSV template, which reflect final project scope.	IOB technical team has reviewed and approved network design, Professional Engineer (PE) certification, and nodes CSV template.	10%
4	All contractor contracts signed	If using contractors, copy of all signed contract(s) applicable for the construction of the funded network based on project plan. If project does not leverage external contractors, or a project leverages both contractors and in-house staff for construction, IOB requires a staffing plan demonstrating use of in-house labor. Business Enterprise Program (BEP) Utilization Plan documenting planned use of BEP-certified vendors. Documentation that excavators have completed up to four required JULIE trainings: • New JULIE Law Changes • Positive Response System for Excavators • JULIE Essentials for Excavators (for excavators in-state) • JULIE Out of State Excavator (for excavators out of state)	IOB has reviewed and approved a copy of all signed contract(s), if applicable. IOB has reviewed and approved a staffing plan, if applicable. The staffing plan must align with IOB guidance, to be published. IOB has reviewed and approved the Grantee's BEP Utilization Plan. IOB has reviewed and approved confirmation that excavators (either contractor or in-house) have completed required JULIE trainings.	10%
5	National Environmental Policy Act (NEPA) assessment complete and NTIA approval obtained	Approval of NEPA Decision Memo by NTIA. If the IOB and grantee split a BOTB-ID into multiple NEPA sub-projects, disbursement can be requested at the completion of this milestone for each NEPA sub-project. Disbursement will be proportional to the size of the NEPA sub-project in terms of locations relative to the whole BOTB-ID.	IOB has the NTIA-approved NEPA decision memo and the Grantee has signed an acknowledgement of the Decision Memo.	3%

6	Project-specific applications for permits & rights-of-way access submitted	Completion of the IOB-provided Permit Tracker that lists all required permits needed to complete the project build and demonstrates that permit applications have been submitted to each permitting entity in the project area. The IOB will request additional evidence of submitted permit applications (at least two permit samples) following review of the permit tracker.	IOB has reviewed and approved the Permit Tracker and any additional evidence requested which demonstrates that applications have been submitted to all permitting entities in the project area.	2%
Pre-Deployment Subtotal				35%

Deployment Phase

#	Milestone	Documentation needed to substantiate milestone	Milestone is complete and payment disbursed when...	Payment Attributed to Milestone
7	Passed 10% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 10% of project locations passed, including all No-BEAD location proposals resolved.	Location-level updates and associated nodes reported reflect 10% of project locations passed. All No-BEAD location proposals are resolved.	5%
8	Passed 20% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 20% of project locations passed, including all No-BEAD location proposals resolved.	Location-level updates and associated nodes reported reflect 20% of project locations passed. All No-BEAD location proposals are resolved	5%
9	Passed 30% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 30% of project locations passed, including all No-BEAD location proposals resolved.	Location-level updates and associated nodes reported reflect 30% of project locations passed. All No-BEAD location proposals are resolved	5%
10	Passed 40% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 40% of project locations passed, including all No-BEAD location proposals resolved.	Location-level updates and associated nodes reported reflect 40% of project locations passed. All No-BEAD location proposals are resolved.	5%

11	Passed 50% of project locations	Completed Periodic Performance Report (PPR) and location-level updates, including all No-BEAD location proposals resolved, plus provided as-built documentation, reflecting 50% of project locations passed.	Location-level updates and associated nodes reported reflect 50% of project locations passed. All No-BEAD location proposals are resolved. IOB completes successful field validation and review of as-built documentation, verifying the factors laid out below under definition of “passed.”	5%
12	Passed 60% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 60% of project locations passed, including all No-BEAD location proposals resolved.	Location-level updates and associated nodes reported reflect 60% of project locations passed. All No-BEAD location proposals are resolved.	6%
13	Passed 70% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 70% of project locations passed, including all No-BEAD location proposals resolved. BEP lien waivers signed by approved vendor(s) listed in the BEP Utilization Plan. 2	Location-level updates and associated nodes reported reflect 70% of project locations passed. All No-BEAD location proposals are resolved. IOB reviews and approves BEP lien waiver for completion aligned with BEP goal, as expected at this point in time.	6%
14	Passed 80% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 80% of project locations passed, including all No-BEAD location proposals resolved. BEP lien waivers signed by approved vendor(s) listed in the BEP Utilization Plan. 2	Location-level updates and associated nodes reported reflect 80% of project locations passed. All No-BEAD location proposals are resolved. IOB reviews and approves BEP lien waiver for completion aligned with BEP goal, as expected at this point in time.	6%

15	Passed 90% of project locations	Completed Periodic Performance Report (PPR) and location-level updates reflecting 90% of project locations passed, including all No-BEAD location proposals resolved. BEP lien waivers signed by approved vendor(s) listed in the BEP Utilization Plan. 2	Location-level updates and associated nodes reported reflect 90% of project locations passed. All No-BEAD location proposals are resolved. IOB reviews and approves BEP lien waiver for completion aligned with BEP goal, as expected at this point in time.	6%
16	Served all project locations	Completed Periodic Performance Report (PPR) and location-level updates, plus provided as-built documentation, reflecting 100% of project locations served, including all No-BEAD location proposals resolved. BEP lien waivers signed by approved vendor(s) listed in the BEP Utilization Plan, meeting BEP Utilization Plan goals. 2 Illinois Works Certification to Close Out Project form.	Location-level updates and associated nodes reported reflect 100% of project locations served. All No-BEAD location proposals are resolved. IOB reviews and approves BEP lien waiver for completion aligned with BEP goal. IOB verifies Certification to Close Out Project form. IOB verifies compliance with all relevant federal and state requirements.³	11%
Deployment Subtotal				60%

Reporting Phase

#	Milestone	Documentation needed to substantiate milestone	Milestone is complete and payment disbursed when...	Payment Attributed to Milestone
Reporting with Expense Documentation	17	Submission of periodic reports and completion of monitoring process for the following two reporting periods: - January - March (submit by April 10) - July - Sept (submit by Oct 10) (Disbursements will be generated every 6 months following receipt of reporting)	Submission of quarterly reports, including Periodic Performance Report (PPR), Periodic Financial Report (PFR), General Ledger (GL), and other quarterly requirements. Supporting documentation as requested by the IOB, including invoices, source documents, and proof of payment.	IOB confirms receipt of quarterly reports.
Reporting Subtotal				5%

Notes:

¹ For grantees obtaining performance bonds in lieu of a Letter of Credit, these must be obtained within 60 days of signing the grant agreement. No fixed amount subaward payments will be disbursed, even if the grantee has met the requirements of the above milestones, until the performance bonds have been obtained by the grantee and documentation verified by IOB.

² The grantee may receive disbursements from milestones 13-15 as a sufficient amount of lien waivers are provided to show the BEP participation goals are met. The IOB will hold back disbursement on each milestone up to the corresponding amount of the unmet participation goal amount. For example, if a grantee has a 29% participation goal, they will need to provide at least enough in lien waivers to cover 6% of the grant award in order to receive the 6% disbursement in milestone 13. They would then need to have lien waivers covering 12% total of the grant award to receive the 6% disbursement of milestone 14. Only once all lien waivers have been received, showing the full BEP goal amount has been achieved, can the final disbursement in milestone 16 be released. Grantees can also provide lien waivers earlier to meet their BEP goal requirement. Once the grantee provides enough lien waivers to demonstrate goal compliance, no further lien waivers are needed.

Breakdown:

- If BEP goal $\leq 11\%$, BEP lien waivers are only required for milestone 16
- If goal is between 11-17%, BEP lien waivers are required for milestone 15 & 16
- If goal is between 17-23%, BEP lien waivers are required for milestone 14, 15 & 16
- If goal is between 23-29%, BEP lien waivers are required for milestones 13, 14, 15 & 16

Note that the maximum possible BEP goal is 29%.

³ IOB will verify that the following state and federal requirements have been met prior to approving disbursement for Milestone #16 and closing out the award:

- Letter of Credit or Performance Bond is still in place
- All previous monitoring requests have been completed
- All previous quarterly reports have been completed
- Grantee is in compliance with GATA
- Project has no Illinois Department of Labor (IDOL) open investigations around payment of prevailing wage
- Grant agreement has no incomplete scope or budget modifications
- All requirements within 2 CFR 200, not otherwise listed here or specifically altered by the Grant Agreement, are met
- Grantee is in compliance with all State Statutes listed in the Grant Agreement not otherwise listed above

Definitions

Nodes – Evidence of infrastructure which supports the connection of surrounding BEAD-eligible locations and CAls (e.g., cabinets, towers, splice points, handhole, splitter, etc.). Nodes should be provided using a template IOB will provide.

Reporting with Expense Documentation - Submission of quarterly reports, including Periodic Performance Report (PPR), Periodic Financial Report (PFR), and General Ledger (GL), plus supporting documentation as requested by the IOB, including invoices, source documents, and proof of payment. Reporting with Expense Documentation, which generates a disbursement, occurs following two reporting periods:

- January - March (submit by April 10)
- July – Sept (submit by Oct 10)

Whereas, the following reporting periods only require submission of periodic reports (PPR, PFR, GL), without supporting documentation requested, and do not generate a disbursement:

- April - June (submit by July 10)
- Oct – Dec (submit by Jan 10)

Passed Location (Fiber/HFC) - A BEAD location for which last-mile fiber or hybrid fiber-coaxial (HFC) infrastructure has been constructed, such that the location is capable of being connected using a standard drop without additional network construction. A fiber or HFC location may be reported as *passed* for milestone reimbursement purposes when all of the following conditions are met:

Required Conditions (Fiber/HFC)

- **Fiber/HFC distribution infrastructure is constructed**, meaning the distribution fiber/HFC has been built past the location and is physically available for connection.
- **Network electronics are installed and operational**, meaning the required network electronics (such as OLTs, cabinets, splitters, and related equipment) are installed, powered, and operational, enabling connection of locations using a standard fiber/HFC drop.

Required Conditions (Fiber/HFC) Cont.

- **Fiber/HFC activation and testing are complete**, meaning fiber/HFC has been spliced or constructed, tested, and accepted in accordance with industry standards.
- **Network electronics are installed and operational**, meaning the required network electronics (such as OLTs, cabinets, splitters, and related equipment) are installed, powered, and operational, enabling connection of locations using a standard fiber/HFC drop.
- **Fiber/HFC activation and testing are complete**, meaning fiber/HFC has been spliced or constructed, tested, and accepted in accordance with industry standards.
- **The location can be connected using a standard fiber/HFC drop** without additional significant feeder or distribution construction.
 - *Note: Installation of individual customer fiber/HFC drops, and other premise-level equipment is not required for a location to be considered passed.*
- **Permitting, make-ready, and compliance requirements are complete**, meaning all construction-related permitting, make-ready work, and rights-of-way necessary to serve the location are complete.
- **The network is connected to operational upstream backhaul** capable of delivering BEAD-required service levels, or grantee demonstrates that upstream backhaul exists or is actively being built.
 - *Note: Upstream backhaul must be operational at the time locations are reported as passed, but is not required to be fully scaled, fully redundant, or engineered for ultimate peak demand at interim deployment milestones.*
- A location may be counted as passed regardless of whether the occupant has ordered or activated service, meaning meeting this milestone is agnostic to customer subscription.

Passed Location (Fixed Wireless) - A BEAD location that is within the coverage area of an activated fixed wireless network, such that the location is capable of being connected following installation of a standard customer-premises receiver antenna, without additional network construction. A fixed wireless location may be reported as *passed* for milestone reimbursement purposes when all of the following conditions are met:

Required Conditions (Fixed Wireless)

- **Tower and vertical infrastructure are constructed** and/or leased, meaning:
 - Wireless towers and/or vertical assets (e.g., monopoles, building rooftops, etc.) have been constructed and/or lease agreements executed.
 - The number and placement of towers (and vertical assets) are consistent with the approved network design.
 - *Note: The physical infrastructure may differ from the original network design so long as the project achieves the performance requirements specified in the grant agreement, provided that the physical infrastructure meets all environmental and historic preservation requirements for BEAD and is authorized by the Decision Memo.*

Required Conditions (Fixed Wireless) Cont.

- **Required network electronics are installed and operational**, meaning:
 - Required network electronics, including base stations, radios and antennas, are installed, powered and operational.
 - The number and configuration of base stations, radios, and antennas installed are sufficient to serve the locations being reported as passed and are consistent with the approved network design.
 - Full deployment of all base stations contemplated in the approved network design is not required at interim deployment milestones.
- **Wireless network activation and testing complete**, meaning the wireless network has been commissioned and tested, including RF and network testing, and is capable of delivering the performance requirements specified in the grant agreement.
- Each location reported as passed can be **connected using a standard customer-premise receiver antenna installation**.
 - *Note: Installation of individual receiver antennas and other premise-level equipment is not required for a location to be considered passed.*
- **Permitting and regulatory compliance is complete**, meaning all permits and authorizations required to construct the wireless infrastructure and emit radio-frequency signals are in place.
- **Upstream backhaul is functional**, meaning:
 - Vertical assets are connected to operational upstream backhaul capable of delivering BEAD-required service levels.
 - *Note: Upstream backhaul must be operational at the time locations are reported as passed, but is not required to be fully scaled, fully redundant, or engineered for ultimate peak demand at interim deployment milestones.*
- **A location may be counted as passed regardless of whether the occupant has ordered or activated service**, meaning meeting this milestone is agnostic to customer subscription.

As-built Documentation - A set of updated plans documenting a facility or equipment exactly as it was constructed, capturing all final changes, deviations, and details from the original design. These drawings must show the true location of elements like pipes, wiring, walls and other obstacles and serve as the official record upon project completion. These drawings must be signed by the contractor.

Field Validation - Involves ensuring that BEAD projects are built in line with project specifications and stipulations in the grant agreement. The IOB contracts with a field validation vendor, who coordinates with the internet service provider to conduct visual verification, network performance testing, and other validation of project implementation.

Disbursement of Grant Funds

The timeline for the grantee's request for payment and the IOB's disbursement of funds are below:

- **Timeline for grantee disbursement request:**

- For Pre-deployment & Deployment milestones: All grantees can submit disbursement requests **as frequently as once per month**. Submitting a disbursement request through the Illinois BEAD Portal will prompt the grantee to upload evidence, which will generate a disbursement request.
- For Reporting milestones: All grantees must submit all reports each quarter, including milestone progress updates through the Periodic Performance Report (PPR). Submission of reports for the two quarters ending March 31 and September 30 generates a disbursement request.

Type of Reporting	Generates Disbursement?	Required Documents	Timeline
Reporting with Expense Documentation	Yes	• PPR • PFR • General Ledger • Expense documentation as requested from the IOB	Reporting for January – March, due April 10 Reporting for July – September, due October 10
Reporting without Expense Documentation	No	• PPR • PFR • General Ledger	Reporting for April – June, due July 10 Reporting for October – December, due January 10

- **Timeline for receiving disbursements:**

- Disbursement frequency:
 - Maximum frequency – IOB will process disbursements up to once per month, aggregating a grantee's disbursement requests across milestones; to request disbursement, a grantee will submit associated milestone evidence, and ensure relevant reports are up-to-date (i.e., location-level updates)
 - Minimum frequency - If grantees do not submit pre-deployment or deployment milestone evidence, they will receive disbursements every 6 months, following the submission of reporting for periods ending March 31 and September 30.
 - *The 6-month timeframe for disbursements based on reporting are intended to accommodate letter of credit waiver requirements, though will be available to all grantees. This is reflected in milestone 17 in the table above.*
- Disbursement process: Once grantees submit a disbursement request and corresponding milestone evidence, submissions are reviewed by IOB. Once approved by IOB, disbursement requests are sent to the Comptroller for processing.

- **Conditions for payment of final deployment disbursements:**

- The final 4 deployment disbursements (totaling 29%) are subject to change based on grantee compliance with state requirements throughout the grant cycle. In the event that requirements have not been met, IOB may withhold final payments.
- The last deployment disbursement (11%) will be provided after grant closeout, to include the completion of all federal and state compliance requirements, as listed above³.

- **Additional disbursement considerations:**

- Disbursements will be made only for fully completed milestones, with the exception of milestone 5, which may be split up to align with NEPA sub-projects.
- No disbursements will be made until the grant agreement between the grantee and IOB is executed.
- If a grantee opts to secure a performance bond for some or all of their projects, a grantee cannot receive disbursement until the grantee has provided the performance bond documentation to IOB, which must be within 60 days of grant agreement execution.
- If applicable, changes to the scope of work of the project that affects location counts during the period of performance will require a reassessment of the deployment phase payouts.

The process to request disbursement will be covered in forthcoming grantee trainings.

For more information and templates, please visit the [BEAD Grantee Resource Hub](#).