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# INTERNET FOR ALL

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## Use of Funds for Workforce Development

Broadband Equity, Access, and Deployment  
(BEAD)



U.S. Department of Commerce  
National Telecommunications and Information Administration

## Introduction

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There may be different scenarios in which an Eligible Entity can use BEAD funds for certain workforce development activities in advance of or simultaneously with last-mile deployment projects. As with any proposed use of funds, whether the specific activities contemplated by the Eligible Entity are classified as deployment or non-deployment activities depends on the facts particular to that Eligible Entity's proposal. The Eligible Entity should categorize its costs in the way that most appropriately reflects the activities to be undertaken. It is always the Eligible Entity's responsibility to demonstrate that a proposed activity is an eligible use of BEAD funds under the relevant use of funds category in the program's Notice of Funding Opportunity (NOFO).

*This document is intended solely to assist recipients in better understanding the BEAD program and the requirements set forth in the Notice of Funding Opportunity (NOFO) for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in this document.*

## Uses of BEAD Funds for Workforce Development

### Scenario 1

*An Eligible Entity may demonstrate that certain workforce costs could be an **eligible deployment use of funds***

Certain workforce costs are an allowable use of funds when incurred in connection with last-mile broadband deployment projects, as specifically described in the eligible uses of funds in connection with last-mile broadband deployment projects listed on page 39 of the NOFO. These funds must be competitively sub-granted in compliance with the BEAD NOFO requirements for deployment projects. Eligible Entities proposing such uses of funds must explain in Initial Proposal Requirement 8 any special processes for the selection of workforce subgrantees that will not be included in the broader deployment subgrant process, including the application of subgrantee qualification requirements or how it will integrate workforce into the overall subgrantee selection process for deployment projects.

### Scenario 2

*An Eligible Entity may demonstrate that other workforce costs could be an **eligible non-deployment use of funds***

Other workforce costs may be an allowable non-deployment use of funds. As described in the introduction, the burden is on the Eligible Entity to explain how any such proposed activity would fall within the list of eligible non-deployment uses of BEAD funds on pages 39-40 of the NOFO. For non-deployment uses, an Eligible Entity may conduct a competitive subgrant process but may also engage in these activities itself.

Under this approach, if an Eligible Entity seeks to use BEAD funds for workforce costs in advance of or simultaneously with last-mile deployment projects upon approval of the Initial Proposal, the Eligible Entity must, as described in page 46 of the BEAD NOFO, demonstrate “to the satisfaction of the Assistant Secretary that the Eligible Entity has a plan to meet the unserved and underserved location broadband deployment commitments set forth in the Eligible Entity’s Final Proposal. . . .”

Thus, *in the Initial Proposal*, an Eligible Entity that seeks to fund workforce activities as a non-deployment use of funds prior to or simultaneously with last-mile broadband deployment projects must:

- ✓ Set forth its plan to ensure coverage of all unserved and underserved locations to the satisfaction of the Assistant Secretary<sup>1</sup>;
- ✓ Demonstrate that it will have sufficient funds to cover both its deployment obligations and the proposed workforce activities; and
- ✓ Articulate why it needs to begin workforce activities prior to the submission of the final proposal.

<sup>1</sup> If necessary, Eligible Entities may seek a waiver of this NOFO provision consistent with NTIA’s waiver guidance.

**Eligible entities should keep in mind that proposed activities in either scenario are still subject to the approval of the Assistance Secretary as part of his broader consideration of an Initial Proposal.**