

NJBIDE Subgrantee

Compliance & Reporting Handbook (2026)

Table of Contents

NJBIDE Subgrantee	1
Compliance & Reporting Handbook (2026)	1
Section 1: Prevailing Wage & Labor Compliance	2
1.1 Statutory Authority & Definitions.....	2
1.2 Contractor Registration & Labor Integrity.....	2
Section 2: Subcontractor Disclosure & Transparency	2
Section 3: Compliance with the Prevailing Wage Act	3
Section 4: Reporting Schedule & Portals	3
Section 5: 2026 Reporting Calendar	4
Section 6: Reimbursement & Evidence Requirements	5
Section 7: Regulatory Compliance Statement	6
Section 8: Technical Milestones & Location Data	6
Section 9: Financial Drawdowns, Compliance & Closeout.....	7
Section 10: Property Management & Capital Asset Inventory	8
10.1 The "Commercial Practices" Exception	8
10.2 The "Federal Interest" Tag (Mandatory)	9
10.3 Federal Interest Period & Trust Relationship	9
10.4 Upgrades and Disposition.....	9
10.5 Encumbering Grant-Funded Property.....	9
Section 11: Support & Coordination	10

The purpose of this handbook is to provide guidance to **New Jersey Broadband Infrastructure Deployment Equity (NJBIDE)** pilot program subgrantees. Adherence to these guidelines is a condition of your grant agreement and ensures compliance with both State of New Jersey and Federal (U.S. Treasury) regulations.

Section 1: Prevailing Wage & Labor Compliance

All projects funded by the Board of Public Utilities under the New Jersey Broadband Infrastructure Deployment Equity (NJBIDE) program—whether executed by a Local Government Unit (LGU) subrecipient or an ISP contractor on a fixed subaward—must strictly comply with the New Jersey Prevailing Wage Act and the Public Works Contractor Registration Act.

1.1 Statutory Authority & Definitions

- **The New Jersey Prevailing Wage Act (N.J.S.A. 34:11-56.25 et seq.):** This Act mandates the payment of prevailing wage rates to workers employed in the performance of any construction undertaken in connection with Board of Public Utilities (BPU) financial assistance.
- **The Public Works Contractor Registration Act (N.J.S.A. 34:11-56.48 et seq.):** This Act requires all contractors, subcontractors, or lower-tier subcontractors who bid on or engage in the performance of prevailing wage work to register with the Department of Labor and Workforce Development (NJDOL). The Contractor Registration Certificate is issued to both the company and its responsible representatives.

1.2 Contractor Registration & Labor Integrity

- **Mandatory Registration:** Subgrantees must ensure that all vendors and subcontractors hold a valid Public Works Contractor Registration (PWCR) certificate at the time of the bid and maintain it throughout the duration of the contract.
- **The Workplace Accountability in Labor & Debarment Lists (N.J.S.A. 34:1A-1.16):** You are strictly prohibited from contracting with any entity listed on the NJDOL Debarment List or the Workplace Accountability in Labor List.
- **Low Bid Certification:** A written prevailing wage certification is required for any bid that is 10% or more below the next lowest bid.

Section 2: Subcontractor Disclosure & Transparency

Before any onsite work begins or any reimbursement for subcontracted labor is processed, the Subgrantees must submit a comprehensive list of all subcontractors involved in the project.

- **Retrospective Disclosure for Active Projects:** Subgrantees who have already commenced construction or infrastructure work prior to the issuance of this handbook must submit a complete list of all subcontractors utilized to date. This catch-up disclosure is due within 10 business days of receipt of this handbook.
- **Required Data Points:** Legal Business Name/DBA, 9-digit FEIN, PWCR Number, Scope of Work, and Estimated Contract Value. To submit this information, use the following form: “[Retrospective Disclosure for Active Projects](#)”.

Section 3: Compliance with the Prevailing Wage Act

Under New Jersey law, all contractors and subcontractors working on NJBIDE-funded projects must strictly comply with the New Jersey Prevailing Wage Act (PWA). Public Works Contractor Registration (PWCR): Every contractor and subcontractor must hold a valid, unexpired Public Works Contractor Registration (PWCR) issued by the New Jersey Department of Labor and Workforce Development prior to engaging in or performing any project work. Subgrantees are responsible for verifying the active registration status of all entities performing construction activities on the project.

Official NJDOL PWCR Resources for Contractors:

- **Online Application Portal:** Contractors can apply for or renew their PWCR online by visiting njportal.com/lwd/pwcr.
- **Official FAQ & Reference Guide:** For a comprehensive guide on required documentation, fees, and processing times, contractors can visit the official [Public Works \(Contractor Registration\) FAQs](#).
- **Application Forms & Instructions:** The official forms and detailed step-by-step registration instructions are available via the [PWCR Contractor Registration document](#).

Section 4: Reporting Schedule & Portals

Subgrantees must navigate two primary reporting cycles. Please refer to your **Executed Grant Agreement** regarding your specific milestone schedule and opening dates.

Monthly Status Report

- **Due:** 5th business day of every month.
- **Submission:** Use [Monthly Form](#)
- **Focus:** High-level project updates and immediate risks.

Quarterly Performance Report

- **Due:** 10 business days after quarter-end.
- **Submission:** Use [Quarterly Performance Form](#)
- **Focus:** Progress against specific grant milestones.

Quarterly Expenditure Report

- **Due:** 60 calendar days after quarter-end.
 - **Portal:** Use [NJBPU IGX Grant Management Portal](#)
 - **Rule:** You **must** initiate a report even if you have **\$0 expenditure** to report.
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Section 5: 2026 Reporting Calendar

Month	Report Due	Period Covered	Deadline	Submission Form
April	Monthly Status Report	Mar-26	5-May-26	Monthly Form
	Quarterly Performance	Q1 (Jan–Mar)	10-Apr-26	Quarterly Form
	Quarterly Expenditure	Q1 (Jan–Mar)	4/1/26 to 5/31/26	NJBPU IGX Portal
May	Monthly Status Report	Apr-26	5-May-26	Monthly Form
June	Monthly Status Report	May-26	5-Jun-26	Monthly Form
July	Monthly Status Report	Jun-26	5-Jul-26	Monthly Form
	Quarterly Performance	Q2 (Apr–Jun)	10-Jul-26	Quarterly Form
	Quarterly Expenditure	Q2 (Apr–Jun)	7/1/26 to 8/31/26	NJBPU IGX Portal
August	Monthly Status Report	Jul-26	5-Aug-26	Monthly Form
September	Monthly Status Report	Aug-26	5-Sep-26	Monthly Form
October	Monthly Status Report	Sep-26	5-Oct-26	Monthly Form
	Quarterly Performance	Q3 (Jul–Sept)	10-Oct-26	Quarterly Form
	Quarterly Expenditure	Q3 (Jul–Sept)	10/1/26 to 11/30/26*	NJBPU IGX Portal
November	Monthly Status Report	Oct-26	5-Nov-26	Monthly Form
December	Monthly Status Report	Nov-26	5-Dec-26	Monthly Form
	Quarterly Performance	Q4 (Oct–Dec)	10-Jan-27	Quarterly Form
	Quarterly Expenditure	Q4 (Oct–Dec)	10/1/26 to 11/30/26*	NJBPU IGX Portal

*** IMPORTANT NOTE:** To ensure sufficient BPU processing time, all final reimbursement requests must be submitted no later than November 30, 2026. In strict adherence to U.S. Treasury guidelines, no grant disbursements will be made beyond the December 31, 2026 Period of Performance expiration date.

Section 6: Reimbursement & Evidence Requirements

To receive payment, you must provide "Substantiating Evidence" as required by [2 CFR § 200.302](#) and [§ 200.403](#).

1. **Invoices:** Detailed vendor invoices showing dates, services, and costs.
2. **Proof of Payment (Cleared Funds):**

Note: Subgrantees must have already disbursed funds to a vendor before seeking reimbursement from the State.

- a) Copies of bank statements or the front and back of cleared checks.
- b) For municipalities, counties, and authorities, your Chief Financial Officer (CFO) may submit a Certified General Ledger (GL) report as an allowable form of evidence. The GL must clearly show the date of the transaction, the vendor's name, the check/wire number, and the specific NJBIDE budget line item to which the expense was charged.

- c) **Electronic Funds Transfer (EFT):** For payments made via ACH or wire, please provide the electronic confirmation receipt or a bank statement highlighting the transaction.
3. **Certified Payroll:** Required for all construction/infrastructure labor. Use the [Prevailing Wage Hub](#) for certified payroll submissions. Submissions to the BPU (“Public Body”) send to broadband@bpu.nj.gov and copy elena.thaxton@bpu.nj.gov.
4. **U.S. Treasury BSL Template:** On a quarterly basis and as you pass the required number of Broadband Serviceable Locations, you must submit via email the [CPF1a Broadband Infrastructure Location U.S. Treasury Template](#) to broadband@bpu.nj.gov and elena.thaxton@bpu.nj.gov
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Section 7: Regulatory Compliance Statement

Subgrantees are subrecipients of federal funds from the **U.S. Department of the Treasury Capital Projects Fund (CPF)**. All costs must be **allowable, allocable, and reasonable** under 2 CFR Part 200. Failure to maintain proper source documentation or comply with NJ Prevailing Wage standards may result in the denial of reimbursement or the "claw back" of previously disbursed funds.

Section 8: Technical Milestones & Location Data

Triggered by project progression.

Following mobilization, subgrantees will be paid on a percentage completion milestone basis. As your project advances, you are required to report on specific Broadband Serviceable Location (BSL) milestones to validate your deployment.

- **Mobilization Milestone:** The initial 10% payment milestone is triggered upon the mobilization of equipment and personnel to the construction site, which must occur within 60 days of the agreement execution date.
- **Deployment Milestones:** You must submit formal location data as you hit the remaining completion targets: 10%, 35%, 60%, 85%, and 100% of locations passed. Specific milestone targets can be found in your executed grant agreement.
- **Engineer's Certification:** Payment for completed milestones requires an [Engineer's Certification](#) that verifies both the project's percentage of completion and the delivered broadband speeds.

- **CPF Location Data Upload:** Submit the mandatory Location Data Template, detailing Fabric IDs, technology types, and delivered speeds for all passed locations.
- **Monthly Site Inspections:** Subgrantees must submit inspection locations via our GIS data collection tool.
 - *Submission Method:* [Access the Survey123 Site Inspection Portal](#)

NJBIDE Deployment Map: *[Under Construction]* An interactive GIS map will be available here to display completed and in-progress BSLs across the state for awardee reference.

Section 9: Financial Drawdowns, Compliance & Closeout

Important notice regarding grant disbursements and final obligations.

The Office of Broadband Connectivity (OBC) actively monitors compliance. Timely reporting is a mandatory requirement of your grant agreement, regardless of expenditure activity.

- **Drawdown Holds:** If a Subgrantees fails to submit required monthly/quarterly reports, or if there is a significant discrepancy between forecasted and actual expenditures without justification, BPU may place a hold on all financial drawdowns.
- **Single Audit & Risk Assessments:** Local Government Unit (LGU) Subgrantees that expend \$1,000,000 or more in Federal awards during their fiscal year must conduct a Single Audit. For-profit contractors are exempt from the Single Audit requirement but remain subject to BPU risk assessments, continuous monitoring, and post-award closeout processes as outlined by U.S. Treasury guidance.
- **Federal Interest & Affordability:** The Federal Interest Period lasts until December 31, 2034. During this time, the Subgrantees must maintain the infrastructure and participate in federal programs (like the ACP or equivalents) that provide low-income consumers with broadband subsidies.
- **Project Closeout:**
 - The entire project must be completed no later than December 31, 2026. All final requests for reimbursement must be submitted no later than November 30, 2026. No reimbursements will be processed or paid beyond December 31, 2026.

- A Close-out Project Performance Report (template is under construction), are due no later than 60 calendar days after project completion.
 - Upon completion of NJBIDE projects, Subgrantees are required to provide data on speed tiers offered and corresponding non-promotional prices, including associated fees, for each speed tier of broadband service. Data should be emailed to the broadband@bpu.nj.gov and a copy to elena.thaxton@bpu.nj.gov using the [Speed and Pricing Template](#).
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Section 10: Property Management & Capital Asset Inventory

Under standard federal Uniform Guidance ([2 CFR § 200.313](#)), the rules for managing equipment and capital assets acquired with federal funds are highly prescriptive. However, recognizing the unique scale of broadband infrastructure, the U.S. Treasury issued supplemental guidance on May 17, 2023, providing significant flexibilities for Capital Projects Fund (CPF) Subgrantees.

All NJBIDE subgrantees (both LGUs and ISP Contractors) must adhere to the following property management standards regarding the U.S. Treasury's "Federal Interest."

10.1 The "Commercial Practices" Exception

Treating a massive fiber-optic network like standard federal equipment (which typically requires a biennial physical inventory of every asset) is impractical. Therefore, subgrantees are permitted to satisfy the federal equipment management requirements by applying their own standard commercial practices in the normal course of business.

- **Allowable Systems:** You may use your existing commercial inventory controls, tracking software, and loss prevention procedures to manage the network assets. You are not required to adopt federally specific inventory software.

10.2 The "Federal Interest" Tag (Mandatory)

The major condition for using your own commercial practices is that your inventory controls and real property records **must** clearly indicate the applicable federal interest.

- **Requirement:** Your internal asset tracking system must have a mechanism to legally tag, label, or categorize all NJBIDE-funded infrastructure (e.g., fiber lines, huts, routers) as possessing a U.S. Treasury Federal Interest.

10.3 Federal Interest Period & Trust Relationship

While you hold title to the property, the federal government retains a legal interest in the infrastructure to ensure it continues to serve its intended public purpose.

- **Duration:** For the NJBIDE program, the Federal Interest Period lasts until **December 31, 2034**.
- **Trust Requirement:** Pursuant to **2 CFR 200.316**, you must hold the agreement property in trust for the beneficiaries of the broadband infrastructure project for the entire duration of the Federal Interest Period.

10.4 Upgrades and Disposition

During the Federal Interest Period, the U.S. Treasury allows for the modernization of the network without requiring complex federal approval processes for every equipment change.

- **Routine Upgrades:** You may dispose of property in the ordinary course of business (e.g., replacing out-of-date equipment to upgrade the network) provided that the same level of service is maintained without material interruption.
- **Inherited Interest:** Any new or upgraded property that replaces the original NJBIDE-funded equipment automatically becomes subject to the same Federal Interest requirements through December 31, 2034.

10.5 Encumbering Grant-Funded Property

Subgrantees (including ISPs and LGUs) may not pledge, lien, or otherwise encumber NJBIDE-funded broadband infrastructure as collateral for a loan without prior federal approval. If a subgrantee intends to encumber project property, they must immediately notify the BPU. Specific legal documents (such as an Intercreditor Agreement and UCC-1 filings) must be drafted to protect the U.S. Treasury's Federal Interest and must be submitted to the BPU for U.S. Treasury approval **prior** to execution by the subgrantee or their lending institution.

Section 11: Support & Coordination

The OBC Project Management Team is here to support you in delivering high-speed, equitable broadband to all New Jerseyans.

If you require technical assistance with the IGX/SAGE portals, have questions regarding the reporting templates, or need to schedule a consultation with the compliance team, please contact us:

- **Primary Email:** broadband@bpu.nj.gov
- **CC:** elena.thaxton@bpu.nj.gov

Note: For official site inspections and compliance meetings, our team will coordinate directly with your designated Project Manager