United States Government Accountability Office

Report to Congressional Requesters

April 2025

BROADBAND PROGRAMS

Agencies Need to Further Improve Their Data Quality and Coordination Efforts

GAO-25-107207

GAO Highlights

Highlights of GAO-25-107207, a report to congressional requesters

April 2025

BROADBAND PROGRAMS

Agencies Need to Further Improve Their Data Quality and Coordination Efforts

Why GAO Did This Study

Access to broadband is critical for employment, education, health care, and other daily activities. Yet millions of Americans lack broadband access, despite at least $44 billion in federal investment over the past decade across myriad programs managed by different agencies. Information on where broadband is not available is key to expanding access.

GAO was asked to review federal broadband efforts. This report examines (1) agencies' use of broadband availability information and the extent to which FCC ensures the quality of data in its National Broadband Map; and (2) the extent to which agencies' coordination of broadband funding programs aligns with GAO's leading practices for interagency collaboration, among other issues.

GAO reviewed documents and interviewed officials from FCC and other broadband funding agencies. GAO compared (1) FCC's practices for ensuring the quality of information in its National Broadband Map against relevant federal internal control standards and (2) interagency coordination efforts with leading practices for interagency collaboration.

What GAO Recommends

GAO is making 14 recommendations, including that FCC document and evaluate the effectiveness of its processes for ensuring the quality of the National Broadband Map's data, and that FCC, NTIA, USDA, and Treasury clearly define and document certain aspects of their coordination. FCC, NTIA, and Treasury agreed with GAO's recommendations; USDA neither agreed nor disagreed.

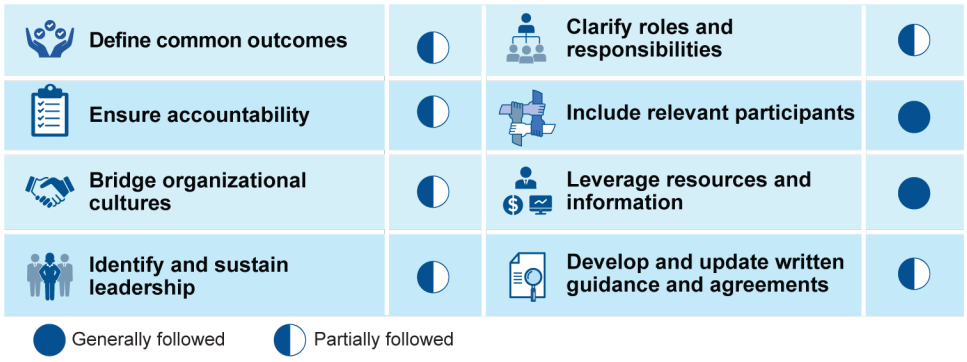
View GAO-25-107207. For more information, contact Andrew Von Ah at vonaha@gao.gov.

What GAO Found

Federal agencies rely on the Federal Communications Commission's (FCC) National Broadband Map as a key information source to target tens of billions of dollars in federal broadband funding by knowing where high-speed internet is already available. However, the accuracy of the broadband availability data on the map is uncertain. FCC has not documented or assessed the sufficiency of its processes for ensuring the information's accuracy. Without taking these steps, FCC cannot be assured its processes are sufficient to ensure the data's quality or that its staff are carrying out these processes consistently, increasing the risk that inaccurate data appear on the map. Inaccurate data could jeopardize agencies' ability to make the most efficient and effective funding decisions.

FCC, the National Telecommunications and Information Administration (NTIA), and the Departments of Agriculture (USDA) and the Treasury coordinate with each other to administer the bulk of federal funding for broadband deployment. GAO found that coordination efforts between these agencies generally followed two and partially followed six of eight leading collaboration practices (see figure).

Assessment of Interagency Coordination Efforts to Administer Federal Broadband Funding Compared with Leading Practices for Interagency Collaboration



Sources: GAO analysis of agency documentation and interviews; GAO icons. | GAO-25-107207

In particular, the agencies use various coordination methods, including regularly meeting and leveraging maps to share data to help avoid duplicate funding. The agencies also have some written agreements to guide coordination, such as an information-sharing memorandum. However, GAO found areas where the agencies have not clearly documented the scope of how coordination efforts will be implemented. For example, they have not clearly defined or documented key areas of their collaborative efforts, such as what "covered data" include when sharing information about their broadband deployment projects, as referenced in the memorandum. The agencies also have not established timelines for providing data on funded projects to the map used to display information on federally funded broadband projects, or documented a formal process for avoiding duplicate funding. Clearly defining, agreeing upon, and formally documenting guidance would better position the agencies to sustain their collaborative efforts, especially should changes in leadership or staff occur. It would also help ensure that billions of dollars in federal funding are spent efficiently and effectively to expand broadband access, including to areas with the greatest need.

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Abbreviations

BEAD	Broadband Equity, Access, and Deployment program
CPF	Capital Projects Fund
FCC	Federal Communications Commission
IIJA	Infrastructure Investment and Jobs Act
MOU	memorandum of understanding
NTIA	National Telecommunications and Information Administration
SLFRF	State and Local Fiscal Recovery Fund
TBCP	Tribal Broadband Connectivity Program
USDA	U.S. Department of Agriculture

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April 17, 2025

The Honorable John Thune
Majority Leader
United States Senate

The Honorable Ben Ray Luján
Ranking Member
Subcommittee on Telecommunications and Media
Committee on Commerce, Science, and Transportation
United States Senate

Broadband, or high-speed internet, is increasingly considered essential for employment, education, health care, and other activities in Americans' daily lives. Nevertheless, the Federal Communications Commission (FCC) reported that as of 2022, fixed broadband was unavailable to approximately 24 million Americans, despite at least $44 billion in federal investment from fiscal years 2015 through 2020.[1] To help bridge the "digital divide"—that is, the gap between those with and without access to broadband—Congress appropriated tens of billions of dollars in additional federal funding since 2020 for programs to support expanding broadband access. In particular, the Infrastructure Investment and Jobs Act appropriated nearly $65 billion for new and existing broadband programs.[2] However, increasing access to broadband remains an ongoing national challenge.

To effectively administer federal broadband funding, we have previously reported that federal agencies need to have a precise understanding of where broadband is already available, including location-specific characteristics of the service (e.g., speeds, internet service providers, and

[1]*Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Report, 39 FCC Rcd. 3247, 3367 (2024). FCC's report focused on Americans' access to fixed "advanced telecommunications capability," which FCC defined as fixed broadband providing 100 megabits per second (Mbps) download speed and 20 Mbps upload speed. Fixed broadband service generally refers to service that is fixed to a specific location, such as a home, as opposed to mobile broadband service. See also GAO, *Broadband: National Strategy Needed to Guide Federal Efforts to Reduce Digital Divide*, GAO-22-104611 (Washington, D.C.: May 31, 2022). In addition, agencies have obligated at least $33 billion in fiscal years 2021 through 2023 to support broadband since then.

[2]Pub. L. No. 117-58, 135 Stat. 429 (2021).

technology types), to target funds to areas with the greatest need.[3] However, we and others have reported that, historically, FCC data—the primary source of broadband availability information—overstated existing service.[4] In 2022, FCC launched its National Broadband Map as part of efforts to improve information on broadband availability.

In 2022, we inventoried federal programs that either must or can be used to support expanding broadband access, identifying more than 100 administered by 15 federal agencies, and documented the varied ways in which agencies coordinate to administer programs.[5] While many agencies provide funding to support broadband access, FCC, the National Telecommunications and Information Administration within the Department of Commerce (NTIA), and the Departments of Agriculture (USDA) and the Treasury administer the bulk of federal funding for deployment of new or enhanced broadband networks.

We have also reported that the role of states and territories in distributing federal broadband funds has increased in recent years with the creation of new programs that provide funds directly to them.[6] For example, the Broadband Equity, Access, and Deployment program (BEAD) provides approximately $42 billion to expand broadband access in all states and territories. Additionally, Treasury's Capital Projects Fund (CPF) is a $10 billion grant program available to states and territories, among other entities, that may be used for broadband infrastructure projects.

You asked us to review issues related to federal broadband programs.[7] This report examines (1) the sources of broadband availability information selected agencies use and the extent to which FCC ensures the quality of data in its National Broadband Map; (2) the extent to which selected agencies' efforts to coordinate their administration of broadband funding programs align with our leading practices for interagency collaboration;

[3]GAO, *Broadband: FCC Is Taking Steps to Accurately Map Locations That Lack Access*, GAO-21-104447 (Washington, D.C.: Sept. 28, 2021).

[4]See, for example, GAO, *Broadband Internet: FCC's Data Overstate Access on Tribal Lands*, GAO-18-630 (Washington, D.C.: Sept. 7, 2018); and Tyler Cooper, *Broadband Availability is Overstated in Every State,* BroadbandNow Research (Apr. 9, 2024).

[5]GAO-22-104611.

[6]GAO-22-104611. In this report, we refer to the 50 U.S. states, five U.S. territories, and the District of Columbia as states and territories.

[7]Senator Luján's request was in his role as Chairman of the Senate Committee on Commerce, Science, and Transportation's Subcommittee on Communications, Media, and Broadband in the 118th Congress, and Senator Thune's request was in his role as the Ranking Member of that subcommittee.

and (3) how selected agencies have coordinated with state and territory governments regarding broadband funding, and those governments' perspectives on that coordination.

To address these objectives, we focused on the four agencies specified above that administer the bulk of federal broadband funding and have formally agreed to coordinate and share data on broadband derived from their programs: FCC, NTIA, USDA, and Treasury. We focused on activities undertaken by these agencies since 2022, when we last reported on federal broadband programs broadly.[8] When reviewing their activities, we also focused on those programs whose main purpose is to fund broadband deployment and, among those deployment programs, those that had funds yet to distribute at the time of our review.[9] We also included Treasury's CPF and State and Local Fiscal Recovery Funds (SLFRF) programs in our review due to the significant amount of funds being used for broadband investment, although funding broadband is only one possible purpose of these programs.

To address our first objective, we reviewed documentation and interviewed officials from FCC, NTIA, USDA, and Treasury. For example, we reviewed program documentation to identify the sources of broadband availability information the agencies use when making funding decisions and other applicable documentation related to this information, such as data collection and review processes. To evaluate FCC's efforts to ensure the quality of the availability information in its National Broadband Map, we compared FCC's practices against relevant internal control standards related to monitoring controls and documenting responsibilities in policies.[10]

To address our second objective, we reviewed documentation and interviewed officials from FCC, NTIA, USDA, and Treasury. For example, we reviewed coordination-related documents, such as interagency agreements and memorandums. We compared the agencies'

[8]GAO-22-104611.

[9]This included FCC's High Cost program, NTIA's BEAD and Tribal Broadband Connectivity Program (TBCP), and USDA's ReConnect and Community Connect programs.

[10]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

coordination mechanisms and activities against the eight leading practices for interagency collaboration identified in our prior work.[11]

To address our third objective, in addition to reviewing documentation and interviewing officials from FCC, NTIA, USDA, and Treasury, we surveyed all states and territories. Specifically, to obtain their views on the four agencies' efforts to coordinate with them, we conducted a web-based survey of all state and territory broadband offices from August 8, 2024, through November 14, 2024. Fifty-one of 56 state and territory broadband offices completed our online questionnaire, which consisted of closed- and open-ended questions. We analyzed the responses to these questions using both quantitative and qualitative methods to produce summary statements, as well as to identify illustrative examples for reporting purposes.

Finally, to obtain additional information on all our objectives, we reviewed applicable statutes and agency program documentation, such as notices of funding opportunities. To gather additional perspectives, we interviewed representatives from 10 stakeholder organizations selected to obtain a variety of viewpoints from a cross-section of stakeholder interests. These views are not generalizable to those of all stakeholders, though they provided us with a variety of perspectives. Appendix I provides additional information on our objectives, scope, and methodology.

We conducted this performance audit from December 2023 to April 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Over a dozen federal agencies play a role in funding broadband, with some agencies administering programs that support broadband as their main purpose and others as one possible purpose. Aside from funding broadband deployment, some of these programs support other aspects of broadband access, such as making service affordable, providing devices, and building digital skills. See appendix II for additional information on the federal programs whose main purpose is to fund broadband deployment.

[11]GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, GAO-23-105520 (Washington, D.C.: May 24, 2023).

The four agencies that administer most of the broadband deployment funding vary in both the amount of support they provide and their focus areas. Specifically:

FCC. FCC's Universal Service Fund programs historically have provided the majority of federal broadband funding. The largest component of the Universal Service Fund is the High Cost program, which targets financial support to rural and high-cost areas for the deployment, operation, and maintenance of voice and broadband networks. For example, FCC's Enhanced Alternative Connect America Cost Model—a recently established mechanism within the High Cost program—will provide approximately $18 billion over 15 years for providers to deploy and maintain qualifying broadband service in locations across the U.S.

Additionally, FCC is responsible for maintaining maps that show where broadband is available and where the federal government has funded a broadband infrastructure deployment project.

- **National Broadband Map.** FCC launched this map in 2022 in response to requirements in 2020's Broadband DATA Act. The map displays location-level information on the availability of broadband service throughout the U.S., including mobile coverage.[12] Internet service providers submit broadband availability information through FCC's Broadband Data Collection twice a year, including the technology type and maximum advertised download and upload speeds they offer at each location. Previously, FCC collected and mapped provider-reported availability data at the census-block level, which resulted in overstated availability.[13] Specifically, as directed by FCC, providers reported an entire census block as served (i.e., broadband is available) even if some locations within that block lacked service. The Broadband DATA Act required that FCC change the way it collects and reports broadband data by directing FCC to collect more granular location-based data to display on its map. In addition, the act required FCC to (1) create a process for entities (e.g., state, local and tribal governments, consumers) to challenge the accuracy of the map and (2) verify information submitted by providers.
- **Broadband Funding Map.** FCC is also charged with collecting and publishing information on the Broadband Funding Map, which launched in 2023 in response to requirements in the Infrastructure Investment and Jobs Act. The act also requires federal agencies to

[12]To review FCC's National Broadband Map, see https://broadbandmap.fcc.gov/home.

[13]These data are referred to as the "Form 477 data" after the FCC form providers fill out to submit the data.

report relevant data to FCC for inclusion in the map. This map displays broadband infrastructure deployment projects funded by the federal government that began as early as January 2019. The map can display both completed and ongoing projects.[14]

NTIA. NTIA has two primary responsibilities with respect to federal broadband funding: it serves as the President's principal telecommunications policy advisor, and it administers its own funding programs. Specifically, NTIA is responsible for advising the President on telecommunications policies pertaining to economic and technological advancement.[15] In addition, the agency administers billions in federal funding appropriated for broadband expansion in recent major legislation. Most notably, authorized in 2021 by the Infrastructure Investment and Jobs Act, BEAD provides states and territories with approximately $42 billion to expand broadband access. To receive funding under BEAD, each state and territory is to create a proposal identifying each area in its jurisdiction lacking sufficient access to broadband, after which local governments, nonprofit organizations, and broadband service providers can challenge whether an area is sufficiently served. After adjudicating challenges, the state or territory creates a final proposal that specifies where it will use BEAD funds for broadband deployment projects. These BEAD proposals are commonly referred to as state plans. In addition, NTIA administers the Tribal Broadband Connectivity Program (TBCP), which provides approximately $3 billion to, among other things, expand access to and adoption of broadband service on tribal land.[16]

USDA. Within USDA, Rural Utilities Service programs provide funding for infrastructure in rural communities, including telecommunications services such as broadband. For example, the purpose of the ReConnect program is to expand broadband services to rural areas that lack sufficient access by awarding grants and low-interest loans to eligible service providers. In addition, the purpose of the Community Connect program is to help rural communities expand broadband service that fosters economic growth and other benefits.[17]

Treasury. Treasury administers two programs in response to the COVID-19 pandemic that have broadband deployment as one possible use of their funds. Specifically, SLFRF is a $350 billion program available to

[14]To review FCC's Broadband Funding Map, see https://fundingmap.fcc.gov/home.

[15]47 U.S.C. § 902(b)(2)(D).

[16]See app. II for additional broadband deployment programs administered by NTIA.

[17]See app. II for additional broadband deployment programs administered by USDA.

state, territory, local, and tribal governments to support their response to and recovery from the COVID-19 pandemic and whose funds may be used for broadband infrastructure investment.[18] In addition, CPF is a $10 billion grant program that provides funding to respond to the COVID-19 pandemic to states, territories, tribal governments, and freely associated states that may be used for broadband infrastructure projects.[19] Under both programs, recipients, not Treasury, select the individual projects for funding based on program eligibility requirements.

In light of the multiple federal agencies involved in administering federal broadband funding, federal statutes call for interagency coordination regarding broadband deployment. For example, the Broadband Interagency Coordination Act of 2020 directs FCC, NTIA, and USDA to enter into an interagency agreement—which the agencies established in June 2021—to coordinate and share information about funding for new broadband deployment projects under their respective programs.[20] In addition to this interagency agreement, in May 2022, FCC, NTIA, USDA, and Treasury entered into a memorandum of understanding (MOU) that established guidelines for sharing information about broadband deployment funding under their programs.[21]

The ACCESS BROADBAND Act, which was enacted in 2020, also specifies that any agency that offers a federal broadband support program should coordinate with NTIA's Office of Internet Connectivity and

[18]SLFRF recipients generally have until December 2026 to expend their program funds, which are available to cover obligations incurred by December 31, 2024.

[19]The American Rescue Plan Act of 2021 established CPF to provide funding to states, territories, and tribal governments to carry out critical capital projects directly enabling work, education, and health monitoring, including remote options, in response to the public health emergency with respect to the COVID-19 pandemic. In addition, the statute also provides for payments to the freely associated states: the Federated States of Micronesia, Republic of the Marshall Islands, and Republic of Palau. 42 U.S.C. § 804. CPF recipients generally must expend their program funds by December 31, 2026.

[20]The Broadband Interagency Coordination Act of 2020 required FCC to submit to congressional committees a report on any findings and recommendations based on public comments regarding the effectiveness of the interagency agreement. Pub. L. No. 116-260, div. FF, tit. IX, § 904(b)(4), 134 Stat. 3214, 3215 (codified at 47 U.S.C. § 1308(b)(4)). In February 2023, FCC published its Report on the Effectiveness of the Broadband Interagency Coordination Act.

[21]The information-sharing MOU is intended to be a separate agreement and not to supersede or otherwise impact the terms of the interagency agreement established in 2021.

Growth.[22] The act requires that the coordination be consistent with certain goals, such as serving the largest number of unserved locations and ensuring that all residents have access to high-speed broadband.[23] Our prior work found that when more than one federal agency is working on the same broad area of national need, those federal efforts are fragmented, and there is risk of duplication or other inefficiencies.[24]

In addition to federal agencies, states and territories play a role in some federal broadband funding programs. As described above, NTIA's BEAD and Treasury's CPF programs provide funding directly to state and territory governments for expanding broadband access. State and territory governments are also eligible entities for USDA's ReConnect and Community Connect grant programs, though the majority of recent funding through these programs has been awarded to internet service providers and other local entities. Additionally, FCC has engaged with states and territories as part of its outreach efforts to implement its Broadband Data Collection, such as soliciting any early concerns states may have had with the transition to the National Broadband Map from FCC's previous methods of collecting and mapping broadband availability data.

Moreover, every state and territory has a centralized entity—commonly known as a state broadband office—that manages the state's overall broadband efforts. NTIA has led efforts to coordinate with states since at least 2009, including through supporting states' and territories' creation of these centralized entities. These entities can take different forms and vary in structure, size, and experience. For example, they may be offices, agencies, or task forces within a state's governor's office, public utility, or commerce department, or could be a stand-alone state entity. While some states established a state broadband office or like entity decades ago, many states and territories have recently done so as part of BEAD implementation. According to the 2022 BEAD notice of funding opportunity, states and territories are allowed to use BEAD planning

[22]The statute's definition of "federal broadband support program" does not include FCC's Universal Service Fund programs, but the statute separately requires that this office and FCC coordinate regarding federal broadband support programs and the Universal Service Fund's High Cost program.

[23]Pub. L. No. 116-260, div. FF, tit. IX, § 903, 134 Stat. 3210, 3210–13 (2020) (codified at 47 U.S.C. § 1307). The act also directed the Assistant Secretary to establish the Office of Internet Connectivity and Growth within NTIA to conduct this coordination.

[24]GAO, *2015 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits*, GAO-15-404SP (Washington, D.C.: Apr. 14, 2015).

funds for establishing, operating, or increasing the capacity of a broadband office that oversees broadband programs and broadband deployment. In addition, to receive BEAD funding, as described above, states and territories are responsible for identifying locations lacking sufficient access to broadband using FCC's National Broadband Map data and developing their own challenge process.

Agencies Rely on the National Broadband Map's Data, but FCC Has Not Documented or Evaluated Its Processes for Verifying the Data's Accuracy

Agencies Rely on the Map as a Key Source of Broadband Availability Information When Making Program Funding Decisions

For their programs, all four selected agencies (FCC, NTIA, USDA, and Treasury) rely to varying degrees on FCC's National Broadband Map as a key source of broadband availability information for identification of locations unserved by broadband, a critical step in making decisions about where to target funding and avoid overbuilding.[25]

First, for some broadband deployment programs, agencies rely almost exclusively on the National Broadband Map to select locations in which to fund deployment. For example, in 2023, FCC began using the map when identifying service locations for certain High Cost program mechanisms, as required by the Broadband DATA Act. Similarly, NTIA relies on the map extensively for BEAD implementation. For example, as required by the Infrastructure Investment and Jobs Act, NTIA allocated BEAD's $42 billion in funding across the states based on each state's number of unserved locations as displayed on the map. Further, the BEAD program required state and territory recipients to use the map to establish their initial lists of locations eligible for BEAD funding.

Second, for some other programs, agencies use the National Broadband Map in combination with one or more other information sources to identify where to target their funds. In particular, for both rounds of TBCP funding,

[25]Often called "overbuilding" in the context of broadband deployment, unplanned and possibly wasteful duplication can occur when separate programs fund deployment in the same area for the same population and purpose.

NTIA allowed Tribes applying for funding to self-certify that locations for which they were applying were unserved by broadband. However, in the second round, NTIA decided to validate Tribes' self-certifications by comparing them against information in the National Broadband Map and other agency data sources.[26] Moreover, according to USDA officials, USDA analyzes the map when assessing proposed projects for ReConnect and Community Connect but then compares the broadband availability information on the map with data from a variety of other sources, including states, program applicants, and USDA's own general field representatives.

In particular, USDA relies on its Service Area Validation process. Under this two-stage process, USDA first conducts a "desktop review" by analyzing geographic information system data, among other methods, to determine whether an applicant's proposed project area already has broadband available. Subsequently, if needed, a general field representative conducts an in-person site visit to attempt to verify the results of the desktop review.

Lastly, according to Treasury officials, Treasury does not require its CPF and SLFRF recipients to use the National Broadband Map when selecting broadband projects to fund. However, officials said they do encourage recipients to check the map in addition to leveraging other data sources.

FCC Has Tools to Ensure the Quality of the Map's Data but Has Not Formally Assessed Their Effectiveness or Documented Them

The Broadband DATA Act requires FCC to verify the accuracy and reliability of the broadband availability data that internet service providers submit to FCC and that populate the National Broadband Map.[27] FCC

[26]NTIA made this change in response to recommendations from the Department of Commerce Office of Inspector General that NTIA improve how it identifies duplication. Department of Commerce, Office of Inspector General, *Management Alert: NTIA's Reliance on Self-Certifications Increased Fraud Risk for the Tribal Broadband Connectivity Program* (July 10, 2023). Consistent with that office's report, we reported that weaknesses existed in NTIA's preaward process for identifying duplication in the first round of TBCP funding. GAO, *Tribal Broadband: Additional Assistance to Recipients Would Better Support Implementation of $3 Billion in Federal Grants*, GAO-24-106541 (Washington, D.C.: June 24, 2024).

[27]47 U.S.C. § 642(b)(4).

described to us the tools it uses to meet this statutory obligation: data validations, verifications, audits, and enforcement referrals.[28]

- **Validations.** All data submitted by providers undergo automated validations at the time the provider submits them to FCC's data collection system. These validations check that the data (1) meet the specifications set forth by FCC (e.g., a provider's entry in a data field must not exceed a certain number of characters); (2) do not contain any apparent errors (i.e., internal inconsistencies); and (3) do not display any anomalous patterns (which officials said could include, for example, showing greater-than-expected changes in availability for a certain technology type and speed threshold, as compared with the provider's most recent submission). If the system identifies an error or anomaly, it prompts the filing provider to either correct the issue or submit an explanation as to why the submission should remain unchanged. FCC staff review these explanations and, where needed, follow up with providers to request clarification. These inquiries can result in corrections to provider-submitted data. Ultimately, staff can withhold data from publishing if providers do not provide an adequate response to FCC inquiries, or staff identify clear errors.
- **Verifications.** According to officials, FCC typically initiates verifications as a result of referrals from third parties or staff reviews of provider data. For example, a state broadband office may report to FCC that it has received numerous complaints from consumers in a certain geographic area related to a provider not offering speeds it claims to offer in its advertisements.[29] Then, FCC requires the provider to submit additional information about its network infrastructure and service availability to substantiate availability claims. According to FCC documents, its staff initiated over 900 validation and verification inquiries from January 2023 through January 2024, resulting in updates to over 600 submissions.
- **Audits.** According to FCC officials, and as required by the Broadband DATA Act, FCC conducts random and targeted audits of provider data, which focus on the accuracy of a provider's reported availability

[28]FCC officials noted that the challenge process described above also contributes to improving the map's accuracy. FCC assessed and reported on the effectiveness of the challenge process. See Federal Communications Commission, *Report on the Broadband Data Collection Challenge Processes* (Washington, D.C.: July 3, 2024).

[29]FCC requires providers to report maximum advertised speeds for the National Broadband Map.

data and largely resemble the verifications described above.[30] As of December 2024, FCC had initiated seven audits—some of which have been closed—as officials have chosen to prioritize verifications instead.

- **Enforcement referrals.** FCC may refer entities for enforcement actions for (1) failing to make a Broadband Data Collection filing in accordance with FCC rules and instructions; or (2) willfully and knowingly, or recklessly, submitting inaccurate or incomplete information regarding the availability or quality of broadband service.[31] FCC officials told us that as of January 2025, they had made a number of referrals to the agency's Enforcement Bureau, resulting in two consent decrees, 11 citations, and 10 forfeitures.

Although the above tools represent meaningful efforts to assess and improve the reliability of providers' broadband availability data, the sufficiency of these efforts is not entirely clear. First, FCC can only carry out a limited number of verifications, audits, and enforcement referrals with its existing resources. In addition, except when FCC may use mobile drive testing conducted by an FCC contractor, verifications and audits rely on information provided to FCC by the same providers whose data are being questioned in the first place. For example, in response to a verification inquiry, mobile providers have the option to submit their own speed test data.

Further, FCC has reported that a substantial number of the challenges filed against fixed availability data (i.e., data that describe the availability of broadband to fixed locations, such as houses or stores) have been successful. Such successful challenges demonstrate that a nontrivial amount of inaccurate data ends up on the National Broadband Map despite FCC's validations, verifications, audits, and enforcement referrals. For example, between November 2022 and November 2023, filers submitted approximately 8 million challenges to the map's fixed availability data.[32] FCC accepted (i.e., it deemed a challenge to have sufficient evidence) and submitted to providers almost 4 million of those

[30]47 U.S.C. § 644. The act requires that FCC conduct regular audits of information submitted by providers to ensure the providers are complying with applicable requirements.

[31]*See* 47 C.F.R. § 1.7009(a)–(b). Enforcement actions can include investigations resulting in monetary penalties.

[32]According to FCC officials, during that time, there were approximately 850 million fixed broadband records on the map.

challenges, about half of which providers ultimately conceded, resulting in updates to the map.

Finally, stakeholders we interviewed—including industry groups, advocacy organizations, and others—raised significant concerns about the reliability of broadband availability data on the National Broadband Map, while acknowledging that the granularity of the data represents a marked improvement over FCC's prior, census-block approach. First, three stakeholders questioned whether providers should serve as the source of the data. For instance, one stakeholder suggested the data would be more reliable if FCC supplemented providers' data with data from other sources, while another stakeholder told us that an independent entity should provide the data, rather than providers.

Additionally, one stakeholder suggested providers have an incentive to overstate the service they offer to prevent competitors from having an opportunity to provide service in the same location. Further, six stakeholders offered reservations about the data, in particular that the data might tend to overstate broadband service. For example, three stakeholders expressed the view that providers' reporting of advertised speeds, as required by FCC's data specifications, rather than speeds users typically experience, likely results in overstating the quality of service. Another stakeholder pointed out that FCC allows a provider to report that it serves a location even if it does not actually serve it, as long as the provider claims it could begin serving that location within 10 business days.[33] This could lead to artificially inflating availability information. Finally, officials we spoke with from two major U.S. cities shared examples of providers in those cities overstating the coverage they offer.[34]

According to agency documents, FCC is continually refining its processes for validating, verifying, and auditing providers' broadband availability data and making enforcement referrals based on lessons learned, but officials said FCC has not formally assessed the effectiveness of these efforts. For example, staff told us they have added more granular final data checks to the automated validations. Moreover, staff have begun to

[33]Under the Broadband DATA Act, FCC is required to issue rules to collect information, including documentation of areas where a provider could provide service by performing "a standard broadband installation." 47 U.S.C. § 642(b)(2)(A)(i)(II). The act defines "standard broadband installation" to include "the initiation of fixed broadband internet access service through routine installation that can be completed not later than 10 business days after the date on which the service request is submitted." 47 U.S.C. § 641(14)(B).

[34]Separately, one federal agency official told us staff had found discrepancies between availability data on the map and their observations on the ground.

develop data-driven algorithms to help narrow the focus of verification inquiries to specific providers, technologies, and areas. While these efforts may have improved FCC's processes, they have not necessarily shed light on the *outcomes* of these processes. More specifically, FCC has not evaluated the extent to which its validations, verifications, audits, and referrals are sufficient in ensuring the accuracy and reliability of provider availability data, the original purpose of these processes.

Moreover, although FCC began collecting provider data in June 2022, officials told us FCC has not yet formally documented the procedures that staff must conduct to carry out the data validations, verifications, audits, and enforcement referrals. Specifically, as of December 2024, 4 years after first announcing that it would use these four tools to help ensure data quality, only various discrete components of these processes (e.g., a process for targeting providers for verification or audit), have been informally documented.

Federal internal control standards state that an agency's management should establish and operate monitoring activities to monitor the internal control system (in this case, validations, verifications, audits, and referrals) and evaluate the findings of those activities.[35] Management may conduct monitoring through ongoing monitoring activities, stand-alone evaluations, or both, and then must assess and document the results to identify internal control issues. This assessment enables management to determine the effectiveness of its controls and take needed steps to remediate identified deficiencies. Federal internal control standards also state that an agency's management should establish documented policies for the organization's internal control responsibilities.

FCC officials described its processes for data validations, verifications, audits, and enforcement referrals as a new workstream that continues to be informed by fresh rounds of data, citing this as the reason why FCC had not yet formally evaluated or finalized formal operating procedures for these processes. However, without evaluating the effectiveness of its validations, verifications, audits, and referrals processes, FCC cannot know the extent to which these processes are sufficient to ensure the accuracy of the data in the National Broadband Map. This, in turn, increases the risk that shortcomings of these processes, if any, may linger. Such risks could jeopardize federal agencies' ability to make efficient and effective federal funding decisions based on the availability data in FCC's National Broadband Map, as well as stakeholders' confidence in the data and those decisions. Evaluating the results of

[35]GAO-14-704G.

these activities could help FCC determine the right balance of activities, given available resources, or whether additional resources or controls are needed.

Ensuring that the processes are formally documented and consistently applied as soon as practicable is particularly important, given the new nature of this workstream, the role the data play in maximizing the efficiency of billions of dollars in funding across federal broadband programs, and the fact that data are to be continuously updated. Doing so also reduces the risk that if FCC staff leave the organization, information and knowledge on these new processes, which could be difficult to recover, would be lost.

Interagency Coordination Efforts Partially Followed Most Leading Collaboration Practices

We identified several key mechanisms and activities that FCC, NTIA, USDA, and Treasury use to coordinate with each other on their administration of federal broadband funding. As shown in figure 1 and discussed further below, we found that the agencies' interagency coordination efforts generally followed two, and partially followed six, of eight leading practices that we have previously identified as aiding collaborative efforts.[36] Our prior work has shown that these practices help agencies enhance and sustain collaboration and are useful for addressing complex issues, such as federal broadband funding.

[36]GAO-23-105520.

Figure 1: Extent to Which Interagency Coordination Efforts to Administer Federal Broadband Funding Follow Leading Collaboration Practices

Leading collaboration practices	Selected key considerations	Extent followed
Define common outcomes	• Have the crosscutting challenges or opportunities been identified? • Have the short- and long-term outcomes been clearly defined?	◐
Ensure accountability	• What are the ways to monitor, assess, and communicate progress toward the short- and long-term outcomes?	◐
Bridge organizational cultures	• Have strategies to build trust among participants been developed? • Have participating agencies established compatible policies, procedures, and other means to operate across agency boundaries? • Have participating agencies agreed on common terminology and definitions?	◐
Identify and sustain leadership	• Has a lead agency or individual been identified? • If leadership will be shared between one or more agencies, have roles and responsibilities been clearly identified and agreed upon? • How will leadership be sustained over the long term?	◐
Clarify roles and responsibilities	• Have the roles and responsibilities of the participants been clarified? • Has a process for making decisions been agreed upon?	◐
Include relevant participants	• Have all relevant participants been included?	●
Leverage resources and information	• Are methods, tools, or technologies to share relevant data and information being used?	●
Develop and update written guidance and agreements	• If appropriate, have agreements regarding the collaboration been documented? Note: A written document can incorporate agreements reached for any or all of the practices. • Have ways to continually update or monitor written agreements been developed?	◐

● Generally followed ◐ Partially followed

Sources: GAO analysis of agency documentation and interviews; GAO icons. | GAO-25-107207

Note: Generally followed – Interagency coordination mechanisms and activities followed most or all aspects of the selected key considerations that GAO examined for the leading practice. Partially followed – Mechanisms and activities followed some, but not most, aspects of the selected key considerations.

Agencies Continue to Use Varied Coordination Mechanisms to Administer Federal Broadband Funding

FCC, NTIA, USDA, and Treasury use a variety of preexisting and new mechanisms to coordinate their administration of federal broadband funding. We previously reported in May 2022 on the various mechanisms the agencies use, and we found that they have continued to use and expand them since 2022.[37] In addition, agency officials told us about new mechanisms, such as the Broadband Funding Map.

[37]GAO-22-104611.

- **Information-sharing MOU.** In May 2022, FCC, NTIA, USDA, and Treasury entered into an MOU that established guidelines for the agencies to share information about broadband deployment funding under their programs. The MOU is the main mechanism these agencies use to share information about their existing and pending broadband deployment projects, according to agency officials. The agencies revised and extended the MOU in May 2024, which expires in 4 years and may be extended as agreed upon by the four agencies.
- **Biweekly coordinating meetings.** In 2022, Treasury joined the biweekly coordinating meetings that were already taking place among FCC, NTIA, and USDA to discuss broadband-related issues, such as new funding or avoiding duplicative funding.[38] As of December 2024, the four agencies continued to meet to share information about federal broadband funding. According to agency officials, these recurring meetings are the primary mechanism by which they build trust among each other.
- **Bilateral agency-to-agency coordination.** According to program funding notices and agency officials, FCC, NTIA, and USDA coordinate with each other directly prior to awarding broadband funding to help avoid duplication of funding. For example, FCC and USDA have coordinated on FCC's High Cost program and USDA's programs, such as Community Connect, which were established prior to 2022. Since 2022, the agencies have extended these efforts to include programs such as those established under the Consolidated Appropriations Act, 2021, and the Infrastructure Investment and Jobs Act. For example, the ReConnect funding notice for fiscal year 2024 states that USDA will coordinate with NTIA to ensure the program complements BEAD. Further, in July 2024, USDA's Rural Utilities Service and NTIA entered into an MOU to help coordinate the concurrent implementation of ReConnect's fifth round of funding and BEAD to avoid duplicative funding. Coordinated program implementation may help reduce the possibility of wasteful duplicative funding, which, as we noted in 2022, may increase with the number of broadband programs.[39]
- **Broadband Funding Map.** In May 2023, FCC published the first version of the Broadband Funding Map. The Infrastructure Investment and Jobs Act authorized the map to be the centralized, authoritative

[38]These meetings resulted from a combination of various efforts, such as the information-sharing MOU and the Broadband Interagency Coordination Act of 2020 and resulting 2021 Interagency Agreement, according to agency officials.

[39]GAO-22-104611.

source of data on federally funded broadband deployment projects. The map displays agency-provided, project-level data, including planned start and end dates, amount of funding awarded, network type, and expected speeds. Officials told us that the map provides a mechanism for agencies to share data with each other and that they can consult the map when coordinating on funding decisions.

In addition to these main coordination mechanisms, the four agencies also participate in other activities, such as the Broadband Coordination Group convened by the Executive Office of the President, which we discuss below.

Coordination Efforts to Administer Federal Broadband Funding Generally Followed Two of Eight Leading Practices

Key Considerations for Including Relevant Participants

- Have all relevant participants been included?

Source: GAO. | GAO-25-107207

We found that the agencies' coordination mechanisms and activities generally followed two leading collaboration practices: (1) including relevant participants and (2) leveraging resources and information.

- **Including relevant participants.** Leading practices state that collaborative efforts should include all relevant participants. As discussed above, the four agencies—FCC, NTIA, USDA, and Treasury—that administer most of the federal broadband funding use a variety of mechanisms to coordinate with each other. In addition to these mechanisms, the four agencies also meet monthly as part of the Broadband Coordination Group convened by the Executive Office of the President's National Economic Council.[40] As of December 2024, the Executive Office of the President told us that the group has convened at least 10 times to coordinate on a wide range of broadband issues, such as mapping and de-duplication of funding, since 2022. The American Broadband Initiative Federal Funding Workstream—co-chaired by NTIA and USDA—also meets biweekly to bring together FCC, NTIA, USDA, Treasury, and other federal agencies that have smaller pools of funding.[41] The group comprises over 20 federal agencies with broadband initiatives and allows them to share and learn about their efforts.

[40]The Broadband Coordination Group, which is co-chaired by the National Economic Council and NTIA, consists of White House staff and senior leaders from the four agencies. In 2021, the council started leading regular meetings to coordinate broadband funding related to the Infrastructure Investment and Jobs Act.

[41]The American Broadband Initiative Federal Funding Workstream, which is now referred to as the Federal Funding Workstream, is a voluntary effort that consists of membership from various agencies, such as the Appalachian Regional Commission, Department of Education, and Denali Commission. The ACCESS BROADBAND Act, Broadband Interagency Coordination Act, and Infrastructure Investment and Jobs Act codified much of the group's interagency coordination activities, according to USDA officials.

Key Considerations for Leveraging Resources and Information

- Are methods, tools, or technologies to share relevant data and information being used?

Source: GAO. | GAO-25-107207

- **Leveraging resources and information.** Leading practices state that to successfully address crosscutting challenges or opportunities, collaborating agencies must leverage technological resources. FCC, NTIA, USDA, and Treasury leverage the Broadband Funding Map and the National Broadband Map as tools to share relevant data to help avoid duplicate funding awards for new broadband deployment.[42] For example, USDA officials told us that the agency has submitted quarterly updates on new broadband investments to the Broadband Funding Map since its initial publication in May 2023. To better align Broadband Funding Map submissions, these officials said it is important to have program funding available for administrative purposes that could also be leveraged to cover key administrative expenses. Such expenses could include having staff with specialized skillsets that can analyze, share, and update geographic information system data in a timely and accurate manner.

Coordination Efforts to Administer Federal Broadband Funding Partially Followed Six of Eight Leading Practices

We found that the agencies' coordination mechanisms and activities partially followed six leading collaboration practices: (1) defining common outcomes, (2) ensuring accountability, (3) identifying leadership, (4) clarifying roles and responsibilities, (5) developing written guidance and agreements, and (6) bridging organizational cultures.

Defining Common Outcomes and Ensuring Accountability

FCC, NTIA, USDA, and Treasury have identified a shared goal in their efforts to administer federal broadband funding but have not defined specific outcomes or performance measures to track progress across programs. Leading practices state that collaborative efforts benefit from defining short- and long-term common goals and outcomes. In addition, these practices state that establishing ways to track and monitor progress toward the shared goals and outcomes, and using performance information to do so, is key to reinforcing accountability.

Key Considerations for Defining Common Outcomes

- Have the crosscutting challenges or opportunities been identified?
- Have the short- and long-term outcomes been clearly defined?

Source: GAO. | GAO-25-107207

- **Defining common outcomes.** The four agencies have not formally defined specific short- and long-term shared goals or outcomes. However, officials from each agency told us that, generally, their shared, overall goal is to provide universal, high-speed internet

[42]FCC has also developed guidance for the Broadband Funding Map that it shares with other federal agencies that may have reportable programs to help encourage reporting of additional data.

service to all Americans (e.g., NTIA's Internet for All initiative).[43] FCC and NTIA officials also said that each agency and program may have its own short- and long-term goals in line with their statutory mandates.[44] In addition, eight of 10 external stakeholders we interviewed agreed that the agencies have a common goal of providing universal broadband access, but individual programs may have different targeted goals largely due to various statutory requirements. Agency officials and seven stakeholders also told us that these statutory requirements, which may include different definitions (e.g., speed thresholds for broadband service provided by funded projects), or parallel program timelines, are a crosscutting challenge for programs.

Key Considerations for Ensuring Accountability

- What are the ways to monitor, assess, and communicate progress toward the short- and long-term outcomes?

Source: GAO. | GAO-25-107207

- **Ensuring accountability.** Officials from all four agencies said that, generally, they use the National Broadband Map to help track progress toward the overall goal of Internet for All. However, we found that the agencies have not established specific performance measures or metrics (e.g., an annual percent decrease in unserved locations) to track progress across all federal programs that fund broadband deployment. While NTIA publishes an annual Federal Broadband Funding Report to cover overall trends in federal broadband investments, outcomes, and economic impacts, it does not identify specific performance metrics.[45] Officials from FCC, NTIA, and

[43]The Internet for All initiative—a multiagency effort facilitated by NTIA—aims to connect everyone in America to affordable, reliable, high-speed internet through federal investments that expand broadband access or promote digital equity and inclusion. In addition, USDA and NTIA share a joint Agency Priority Goal Action Plan (fiscal years 2024 to 2025) related to providing broadband to all Americans. For example, one of the shared goals is to fund broadband infrastructure to 6,250,000 locations. FCC officials also noted FCC's unique role because, while FCC contributes to the Internet for All initiative, FCC is an independent commission following its mandates under the Telecommunications Act of 1996.

[44]For example, FCC has identified specific goals in its strategic plan for fiscal years 2022-2026, such as facilitating the deployment of broadband networks and evaluating the availability of broadband services across the country.

[45]NTIA officials said that the agency will measure and report on the long-term impacts of federal investment on economic factors, such as served locations, but is not responsible for the implementation of other broadband initiatives and does not establish performance metrics for other programs. Per the ACCESS BROADBAND Act, NTIA conducts an annual data call to agencies for the Federal Broadband Funding Report. FCC, USDA, and Treasury contribute data to the report. In August 2024, NTIA published the 2023 report showing fiscal year 2022 data reported by 13 agencies across 70 programs making investments in broadband. In addition, NTIA plans to use data collected through the Broadband Funding Map to report on fiscal year 2023 investments for the next report. National Telecommunications and Information Administration, *2023 Federal Broadband Funding Report: Investing in Internet for All* (Aug. 7, 2024).

USDA, however, said that agencies track progress toward their program-specific goals through funding award reporting requirements. For example, NTIA has postaward mechanisms to track progress of approved BEAD proposals, such as completed milestones, which is shared through a public dashboard.

To help ensure that agencies' programs are aligned, to the extent possible, with an overarching strategy and to minimize duplicative efforts, we previously recommended that the Executive Office of the President develop a national broadband strategy that includes clear goals and performance measures.[46] The office did not take a position on our recommendation and has not developed a strategy that includes all actions to implement the recommendation as of December 2024. Given this recommendation, we are not making an additional recommendation at this time. We will continue to monitor efforts to implement this recommendation, as well as the results of key federal programs that fund broadband deployment, as part of our ongoing work to help ensure accountability for the billions of dollars in funding.

Identifying Leadership and Clarifying Roles and Responsibilities

While FCC, NTIA, USDA, and Treasury have identified a leadership model, they have not collectively defined clear roles and responsibilities. Leading practices call for identifying a leadership model, such as a lead agency or shared leadership, to support oversight and decision-making capabilities of collaborative efforts. In addition, these practices state that clearly defining and agreeing on roles and responsibilities can help agencies organize their joint or individual efforts and overcome barriers when working across agency boundaries.

Key Considerations for Identifying and Sustaining Leadership

- Has a lead agency or individual been identified?
- If leadership will be shared between one or more agencies, have roles and responsibilities been clearly identified and agreed upon?
- How will leadership be sustained over the long term?

Source: GAO. | GAO-25-107207

- **Identifying leadership.** FCC, NTIA, USDA, and Treasury officials agreed that they share leadership but had varying perspectives on whether one agency may have the lead agency role in coordination efforts. Specifically, FCC, USDA, and Treasury officials said that NTIA is a leader, or that NTIA has a special role, given that it is the President's principal telecommunications advisor. However, NTIA officials told us that Congress has not statutorily mandated any agency as the main lead. NTIA facilitates coordination among relevant agencies as the principal advisor, but each agency works to lead and manage its own programs, according to NTIA officials. In addition, these officials told us that NTIA has strategic and statutory reasons to continue facilitating coordination. For example, the ACCESS

[46]GAO-22-104611.

BROADBAND Act directs NTIA to coordinate with other agencies to enhance efficiency and prevent duplication of federal funding.[47]

Key Considerations for Clarifying Roles and Responsibilities

- Have the roles and responsibilities of the participants been clarified?
- Has a process for making decisions been agreed upon?

Source: GAO. | GAO-25-107207

- **Clarifying roles and responsibilities.** FCC, NTIA, USDA, and Treasury officials said that each agency plays a role largely defined in the statutes authorizing or establishing each agency's programs. NTIA officials also noted that agency and program statutes come closest to defining responsibilities for the agencies. For example, FCC's role and responsibilities in developing the National Broadband Map and Broadband Funding Map were defined by the Broadband DATA Act and the Infrastructure Investment and Jobs Act, respectively.[48] However, while the agencies have taken some steps to further identify roles and responsibilities (such as through the information-sharing MOU), they have not clearly and collectively defined, agreed upon, or formally documented key areas of coordination efforts, as discussed further below.

To help ensure that coordination efforts are complementary and lower the risk of overlap and duplication in federal funding, we previously recommended that the Executive Office of the President develop a national broadband strategy, as discussed above, that also includes clear roles.[49] Given this existing recommendation, we are not making an additional recommendation at this time but will continue to monitor efforts to implement this recommendation.

[47]Generally, a grant fund recipient may not charge a cost to one program that is included as a cost or used to meet a cost-sharing or matching requirement of any other federally financed program. 2 C.F.R. § 200.403(f).

[48]Broadband DATA Act, Pub. L. No. 116-130, 134 Stat. 228 (2020); Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 60105, 135 Stat. 429, 1206 (2021).

[49]GAO-22-104611.

Developing Written Guidance and Agreements

Key Considerations for Developing and Updating Written Guidance and Agreements

- If appropriate, have agreements regarding the collaboration been documented? A written document can incorporate agreements reached for any or all of the practices.
- Have ways to continually update or monitor written agreements been developed?

Source: GAO. | GAO-25-107207

While FCC, NTIA, USDA, and Treasury have established some written guidance and agreements to guide their coordination efforts, the existing documentation does not clearly state the scope of some key collaborative efforts and how the agencies will implement them. In addition, the agencies have not clearly documented these key areas in other written guidance or agreements. Leading practices state that articulating agreements in formal documents, and developing ways to monitor and update those agreements, can strengthen participants' commitment to work together and help outline how collaborative efforts operate. These practices also state that documentation can provide consistency in the long term, especially when there are changes in leadership.

As discussed above, the four agencies have established the information-sharing MOU as the main mechanism to share information about their broadband deployment projects and guide their coordination efforts. When the MOU expired in May 2024, the agencies revised and extended it. With regard to monitoring this agreement, the MOU includes a provision stating that it may be revised or modified upon the written agreement of the agencies. NTIA officials told us that requests to update typically come up organically during coordination meetings or other such forums. In addition, Treasury officials noted that agencies periodically monitor the MOU for needed updates.

However, we found three key areas where the existing documentation does not clearly state the scope of, or discuss how the agencies will implement, the collaborative efforts. In addition, the agencies have not clearly defined, agreed upon, or documented these key areas in other written guidance or agreements. Specifically:

- **Defining covered data.** The MOU states that the agencies shall share information with each other about certain projects that have received, or will receive, funds for broadband deployment, including, but not limited to, "covered data." However, because the agencies have not clearly defined or documented what "covered data" include, it is unclear what data agencies have actually agreed to share. When we asked FCC, NTIA, USDA, and Treasury officials what "covered data" encompass, officials provided varied responses. While officials from all four agencies mentioned data related to the Broadband Funding Map, they also provided different explanations of what "covered data" include in practice. For example, FCC officials provided examples related to pending grant applications and data aiding in identifying overlaps during the preaward phase, which officials from the other agencies did not cite. In our analysis of agency documentation, we saw examples of variance in agencies sharing

data on funded project locations, pending applications, and percent overlap in proposed service areas.

Officials indicated that various factors played a role in not explicitly defining "covered data." For example, FCC officials said the type of data an agency shares may depend on how it collects information from program applicants or defines eligible areas (e.g., covered census blocks vs. proposed service areas). NTIA officials also noted that the agencies regularly share information about their projects and have open communication channels to address any concerns around sharing "covered data," such as providing data to assess potential duplication or additional information, as needed. USDA officials added that agencies having a certain level of flexibility when administering their programs under different statutory requirements is important, such as when considering how to define "covered data" to share information.

Clearly documenting an agreed-upon definition of "covered data," including the scope or type of data, would help ensure consistent information sharing about broadband deployment projects across agencies' programs and across years, especially if there are changes in leadership or new staff. For example, without a clear definition, one agency may continue to share information on funded awards and pending applications, while another agency may only share information on funded awards. Agreeing upon a clear definition of "covered data" could also allow the agencies to build needed flexibilities into the definition, which could also help to document expectations. Doing so is particularly important, as sharing information and data on each agency's projects is critical to agencies' ability to maximize the value and reach of the billions of dollars in federal spending committed toward expanding broadband access.

- **Submitting Broadband Funding Map data.** While each agency is responsible for providing data to FCC to update the map on a periodic basis, as directed by the Infrastructure Investment and Jobs Act, there are no specific and agreed-upon timelines for when agencies are to provide data on their funded projects (e.g., 2 weeks after an award is

funded).[50] FCC officials told us that the agency provides monthly reminders to encourage each agency to submit relevant data to the map, but the act does not require specific timelines or provide consequences for failing to submit data. When asked about the estimated frequency that each agency submits data, officials provided varying time frames, such as monthly or quarterly.[51] For example, NTIA submits data at least monthly on new awards or changes to existing awards, and USDA submits quarterly updates, according to officials from these agencies. USDA officials also noted that one agency does not report data until construction on the project is well underway or complete. In addition, Treasury officials told us that their reporting frequency to the map can vary for Treasury's programs based on the size of the funding recipient, such as quarterly or annually.

According to NTIA and USDA officials, it is challenging to keep the data on funded and revised awards up to date and to coordinate funding decisions without updated data. As discussed above, the agencies leverage the Broadband Funding Map to share data with each other and sometimes consult the map when coordinating on funding decisions. Thus, NTIA and USDA officials suggested that setting agreed-upon timelines for submitting data on funded awards, including any changes to awards, would aid coordination. FCC officials told us that the agencies have held preliminary discussions about developing written guidance, to include timelines for data submission, but the agencies are focusing on other aspects of coordination at this time. In addition, in its September 2024 report on proposals to improve broadband program alignment, NTIA recommended that agencies create programmatic documents that include data reporting requirements for the Broadband Funding Map and for NTIA's data collection obligations under the ACCESS

[50]The Infrastructure Investment and Jobs Act requires that FCC, in consultation with relevant federal agencies, ensure the map is updated on a periodic basis but not less frequently than once every 180 days. The act includes a separate provision requiring that each federal agency that provides funding for broadband infrastructure deployment report relevant data to FCC on a periodic basis, but this provision does not include more specifics on the timeline for reporting such data. This reporting requirement applies to more agencies than just NTIA, USDA, and Treasury. Pub. L. No. 117-58, § 60105(e), 135 Stat. at 1207.

[51]FCC officials told us that the Broadband Funding Map system is designed to encourage federal agencies to submit or update data on their projects quarterly, but it is not a requirement, and agencies may also submit data more frequently than quarterly when they have updated information.

Broadband Act.[52] While acknowledging that it may take time to collect the data, the report stated that an accurate map is crucial to ensuring effective federal funding, including to prevent duplicative funding.

Moving forward, agreeing upon a definition of "covered data" and documenting compatible procedures on when to provide those data, could strengthen the agencies' commitment to submit timely broadband deployment data and ensure that the map reflects up-to-date information on funded awards, including changes to awards. Doing so would also better position agencies to coordinate effectively to maximize federal dollars, in part, by reaching areas with the greatest need, such as areas that may have not received prior funding.

- **Establishing a de-duplication process.** Officials from FCC, NTIA, and USDA told us that they have not established a formal process to de-duplicate their funding prior to making decisions about projects to fund.[53] Rather, these officials said the agencies generally follow a high-level process, authored by NTIA, for de-conflicting and resolving potentially duplicative funding situations. NTIA provided us with a written description of the process, which outlined five steps, but stated that it is not an official, agreed-upon process.[54] Similarly, USDA

[52]NTIA's report provided an overview of existing statutory authorities; current efforts to promote alignment, such as in data sharing; and administrative and legislative solutions. For example, NTIA proposed that Congress could include regular reporting requirements consistent with the Broadband Funding Map data standards for new federal programs that fund broadband-related activities, such as deployment. National Telecommunications and Information Administration, *Proposals to Improve Broadband Program Alignment, in response to* GAO-22-104611*, Broadband: National Strategy to Guide Federal Efforts to Reduce Digital Divide* (Sept. 6, 2024).

[53]In addition, Treasury officials noted that the agency has not participated in preaward coordination to help prevent duplicative funding for CPF and SLFRF because Treasury does not choose what projects to fund for these programs. Rather, the state, territory, local, or tribal government recipients of funds choose in accordance with program requirements. Further, the CPF and SLFRF guidance notes that recipients should ensure program funding is not used for costs that will be reimbursed by other federal or state funding streams. However, Treasury officials noted that Treasury does actively work with FCC, NTIA, and USDA to coordinate on de-duplication of funding for those agencies' programs (e.g., BEAD, ReConnect), as needed.

[54]The five steps include (1) analyzing applicant project areas with current and pending federally funded projects and consulting with state broadband offices or tribal entities; (2) sharing its duplication analysis with other federal agencies; (3) holding discussions with the agencies to identify duplication areas; (4) working with the applicants/potential grantees to adjust grant applications, as appropriate; and (5) reviewing all potential grantee project areas again and providing other agencies 15 days to review the final potential grants for duplication prior to final award.

officials told us that the agency views NTIA's written description as more of a set of guiding principles and is not required to take all the steps listed. Agencies may also use documentation provided by relevant entities in conjunction with this process to coordinate with federal and state partners, as USDA did when we observed its staff applying the de-duplication process for a Community Connect application. In addition, NTIA developed internal standard operating procedures to document coordination and de-duplication practices for BEAD and TBCP's second round of funding.

Further, FCC and NTIA officials said that the agencies have considered documenting more formal procedures on de-duplication, potentially through a revised, more detailed MOU or best practices document, but did not provide additional information, supporting documentation, or a time frame.[55] NTIA's September 2024 report on proposals to improve broadband program alignment also recommended that agencies consider revising the information-sharing MOU to establish a single, consistent, formalized de-duplication review process.[56]

Clearly defining, agreeing upon, and documenting a formal de-duplication process would better position the agencies to resolve potentially duplicative funding decisions and facilitate the timely announcements of awards. Doing so could also help avoid project delays or increased costs for awarded projects, such as in instances when duplication is identified postaward. And, ultimately, it could help ensure that federal funding benefits areas that lack high-speed internet, such as unserved or underserved areas.

[55]NTIA officials said that they had developed a proposed MOU to help enhance coordination, which included additional steps for agencies to follow to minimize duplication. As of January 2025, these officials noted that the MOU is not under active consideration by the other three agencies, given potential upcoming changes in leadership.

[56]Specifically, NTIA recommended that agencies enshrine a de-duplication process in an MOU, such as including a review period for other agencies to coordinate efforts before the funding agency makes the final award. National Telecommunications and Information Administration, *Proposals to Improve Broadband Program Alignment, in response to* GAO-22-104611.

Bridging Organizational Cultures

Key Considerations for Bridging Organizational Cultures

- Have strategies to build trust among participants been developed?
- Have participating agencies established compatible policies, procedures, and other means to operate across agency boundaries?
- Have participating agencies agreed on common terminology and definitions?

Source: GAO. | GAO-25-107207

FCC, NTIA, USDA, and Treasury have made progress in bridging organizational cultures but have not fully established compatible policies and procedures, as noted above. Leading practices state that creating common terminology and definitions, undertaking activities to build trust, and developing compatible policies and procedures help agencies coordinate effectively across agency boundaries.

To help bridge organizational cultures, FCC, NTIA, USDA, and Treasury officials acknowledged that the agencies have taken steps to understand each other's varied terminology for their programs, some of which is required by statute. As noted above, broadband speed thresholds for buildout can differ across programs, as can the unit of analysis when reporting information and what constitutes an "unserved status."[57] According to officials from all four agencies, they are aware of the differences across the agencies and within programs and generally understand how another agency applies those terms through conversations and documentation, such as program statutes and notices of funding opportunities. For example, officials understand that USDA uses "de-confliction," while the other agencies use "de-duplication" to describe processes around avoiding overlapping funding. Further, officials said the biweekly meetings and all other coordination mechanisms the agencies use have contributed toward building mutual trust.

Establishing ways to operate across agency boundaries, such as through developing a common understanding of key terms and compatible policies, can help address cultural differences and strengthen trust. Therefore, addressing the gaps we identified in the agencies' coordination efforts could further bridge their organizational cultures.

[57]For example, a reporting unit of analysis may be "households" versus "premises." For determining whether an area has broadband service, TBCP is required to consider whether a broadband provider has an "enforceable build out commitment" to deploy qualifying broadband service in that area. 47 U.S.C. § 1705(a)(14) (referencing such commitments in the definition of "unserved"). The Infrastructure Investment and Jobs Act, however, does not include similar language in its definition of "unserved" for BEAD. *See* 47 U.S.C. § 1702(a)(1)(A). NTIA recommended that Congress consider aligning definitions of broadband infrastructure between the Infrastructure Investment and Jobs Act and the ACCESS BROADBAND Act. National Telecommunications and Information Administration, *Proposals to Improve Broadband Program Alignment, in response to* GAO-22-104611.

State Broadband Offices Have Varied Perspectives on Federal Broadband Funding Coordination Efforts

Selected Agencies Coordinate with State Broadband Offices Using a Variety of Similar Methods and on Common Topics

We found that FCC, NTIA, USDA, and Treasury all coordinate with states and territories through a broad range of methods that were similar across the agencies, and on several common topics.[58] According to officials from all four agencies, the purpose of this coordination is to help states navigate federal broadband programs. These officials told us that their coordination activities with states and territories—which two characterized as extensive—are either loosely guided by statute or occur on a more ad hoc basis based on the programs' focus and states' needs.

- **FCC.** For instance, the Broadband DATA Act requires that FCC provide technical assistance through tutorials and webinars to state, local, and tribal government entities regarding the National Broadband Map challenge process. While FCC's broadband funding programs are mostly directed toward eligible telecommunications carriers (such as eligible internet service providers), it coordinates with states and territories for the Broadband Data Collection. FCC conducts outreach with states and territories for this effort to educate them on the challenge process and to facilitate communication about specific concerns.
- **NTIA.** As another example, the ACCESS BROADBAND Act and BEAD statutory requirements guide NTIA's coordination activities with state broadband offices. For example, the ACCESS BROADBAND Act requires NTIA's Office of Internet Connectivity and Growth to connect with communities that need access to broadband; hold regional workshops across the country to share best practices for promoting broadband access and adoption; and coordinate with state agencies, as applicable, when carrying out these efforts. In addition, the Infrastructure Investment and Jobs Act requires that NTIA provide technical support and assistance to eligible entities (i.e., states and

[58]Coordination in this section refers to actions initiated by FCC, NTIA, USDA, or Treasury with state broadband offices in the form of communication, guidance, technical assistance, and other activities related to applying for, receiving, and administering federal broadband funding.

territories) on a variety of issues to facilitate their participation in BEAD.

- **USDA.** In contrast, USDA's coordination with states and territories is mostly ad hoc. While USDA program funding recipients are typically internet service providers, USDA officials told us that they coordinate with state broadband offices occasionally, such as to prevent duplication or overlap with other federal funding in a state. Officials also told us that coordination with state broadband offices has increased throughout 2024, such as through the general field representatives who engage directly with states on broadband issues.
- **Treasury.** Treasury officials told us they coordinate extensively with states and territories, which are the CPF funding recipients.

As shown in table 1 and described below, the agencies use a variety of similar methods to coordinate, both individually and jointly, with state broadband offices.

Table 1: FCC, NTIA, USDA, and Treasury Methods of Coordination with State and Territory Broadband Offices on Federal Broadband Programs

Method	Example	Used individually	Used jointly
Agency office hours: Use designated time to answer state broadband office questions and share information in a collaborative space	FCC officials host virtual office hours to provide specific guidance to state officials, who can attend on an as-needed basis. NTIA also hosts office hours that other agencies may attend.	FCC, NTIA, and Treasury	✓
Assigned point-of-contact: Designate specific staff to have frequent communication and visibility with state offices	NTIA and USDA use specific positions (program officers and general field representatives, respectively), while FCC and Treasury assign individuals for each state broadband office.	FCC, NTIA, USDA, and Treasury	✗
Email communication: Provide programmatic updates, information, and answer questions	Treasury communicates with state offices through a program-specific inbox to answer a variety of questions on policy, requirements, and reporting. NTIA includes FCC program information in its emails to states to deliver timely joint updates.	FCC, NTIA, USDA, and Treasury	✓
In-person events: Host or attend conferences and events to share information and answer questions	NTIA hosts, and federal agencies attend, in-person events with state offices. Federal agencies also attend other organizations' conferences and events.	FCC, NTIA, USDA, and Treasury	✓
Newsletters: Share a range of information in one place	Treasury and NTIA produce newsletters for their programs. FCC has provided information to NTIA for its newsletters.	FCC, NTIA, USDA, and Treasury	✓
Phone calls: Communicate and coordinate with state broadband offices on specific issues or to answer questions	FCC called broadband leaders in every state and territory as a first step in coordination between FCC and the states for its Broadband Data Collection.	FCC, NTIA, USDA, and Treasury	✓

Method	Example	Used individually	Used jointly
Public notices: Share information and receive comments on federal broadband programs	USDA uses the public notice filing process to review information about projects and facilitate de-duplication efforts with applicants, such as between its ReConnect program and NTIA's Broadband Equity, Access, and Deployment program.	FCC, NTIA, USDA, and Treasury	✗
Recurring meetings: Convene state and territory officials multiple times per year to discuss programs and relevant topics	NTIA's State Broadband Leaders Network meets once per month.	FCC, NTIA, and Treasury	✓
Virtual events: Host or attend virtual meetings and other events	FCC has hosted virtual events for states regarding FCC programs and data reporting to its National Broadband Map.	FCC, NTIA, USDA, and Treasury	✓
Webinars: Host meetings about a program, such as ahead of a notice of funding opportunity deadline	Treasury conducts webinars when there is new guidance for the Capital Projects Fund and State and Local Fiscal Recovery Fund programs, such as when it publishes new FAQs and answers on its website.	FCC, NTIA, USDA, and Treasury	✓
Written guidance: Publish application guidance, frequently asked questions, and technical assistance on website	Treasury issued a user guide for program recipients, including information on reporting requirements. NTIA created a technical assistance website, providing a one-stop shop for NTIA programmatic support.	FCC, NTIA, USDA, and Treasury	✗

Legend: ✓ = Yes and ✗ = No

Source: GAO analysis of documentation and interviews with officials from the Federal Communications Commission (FCC), National Telecommunications and Information Administration (NTIA), and Departments of Agriculture (USDA) and the Treasury. | GAO-25-107207

Officials from all the agencies characterized some of their coordination with states and territories as a joint federal effort. For example, officials from all four agencies coordinate with state offices through NTIA's State Broadband Leaders Network, which is a network of state broadband office practitioners (such as directors) that NTIA convenes to provide a forum to coordinate and share information on broadband programs. FCC, USDA, and Treasury officials attend the State Broadband Leaders Network gatherings or provide program materials for these events. Additionally, while USDA officials told us they do not host recurring coordination events, USDA officials have participated in NTIA's events to coordinate with state offices. FCC and NTIA have also partnered during office hours. For example, FCC officials told us that they have partnered with NTIA officials to facilitate a discussion about how to use FCC's National Broadband Map in the state challenge processes for BEAD.

The agencies generally coordinate through these various means with state broadband offices on a set of similar topics. See table 2 for a description of these topics.

Table 2: FCC, NTIA, USDA, and Treasury Topics of Coordination with State and Territory Broadband Offices on Federal Broadband Programs

Topic	Description
Application guidance	The agencies provide information and support to help guide state broadband offices and applicants through their program applications and requirements for broadband deployment and infrastructure projects.
Broadband availability data maps	FCC and NTIA coordinate with state offices to assist in the data collection efforts for FCC's National Broadband Map and state challenge process for the Broadband Equity, Access, and Deployment program, respectively.
Matching funds[a]	The agencies administer several programs that allow the use of matching funds. Treasury has provided additional guidance for matching funds from its Capital Projects Fund with other programs.
Preventing duplicative funding	The agencies coordinate with state offices to help ensure that no duplicative funding occurs across federal programs and locations.
Service areas/project locations	The agencies provide guidance to applicants as they determine which areas to fund and share more information about projects set to receive federal funds in the area or that may potentially be in a proposed project area.
Timelines of competing federal funding	The agencies provide guidance on timelines for notices of funding opportunities. At times, more than one agency's program will have an open notice of funding opportunity, which may require state offices and applicants to determine which program to apply for and where to propose a project, based on each federal broadband program's respective timeline.
Environmental requirements (e.g., environmental permitting and clearances)	The agencies may provide coordination to help state offices navigate environmental requirements of a project, such as the National Environmental Policy Act, that states and applicants may have to meet to fund and begin construction on a project.

Source: GAO analysis of documentation and interviews with officials from the Federal Communications Commission (FCC), National Telecommunications and Information Administration (NTIA), and Departments of Agriculture (USDA) and the Treasury. | GAO-25-107207

[a]Recipients of federal awards generally may not use funds from a federal award to pay the matching contribution required by another award program, unless the program's authorizing statute specifically provides for such use. 2 C.F.R. § 200.306(b)(5). For example, the Infrastructure Investment and Jobs Act specifically allows for recipients to use funds provided from certain federal programs as matching funds. Pub. L. No. 117-58, § 60102(h)(3)(B), 135 Stat. 429, 1198–99 (2021).

Given programmatic differences, not all agencies coordinate on each topic. For example, FCC and NTIA work with state offices on broadband availability data maps because of their responsibilities with the National Broadband Map and the BEAD challenge process, respectively. Treasury officials said they coordinate with both state offices and other federal agencies in helping states navigate how to use funds from Treasury's CPF and SLFRF programs as matching funds for other federal broadband programs, such as BEAD. In addition, given these programmatic differences, the level of coordination with state broadband offices may vary. For example, USDA officials highlighted that their coordination with state and territory governments may have been less than some other

agencies' coordination because their funding recipients are typically other entities, like internet service providers. Similarly, FCC officials told us that, prior to states establishing their state broadband offices, FCC often worked closely with other state entities, specifically state public utility commissions.

State Broadband Offices Have Varied Perspectives on the Effectiveness and Helpfulness of Federal Agency Coordination

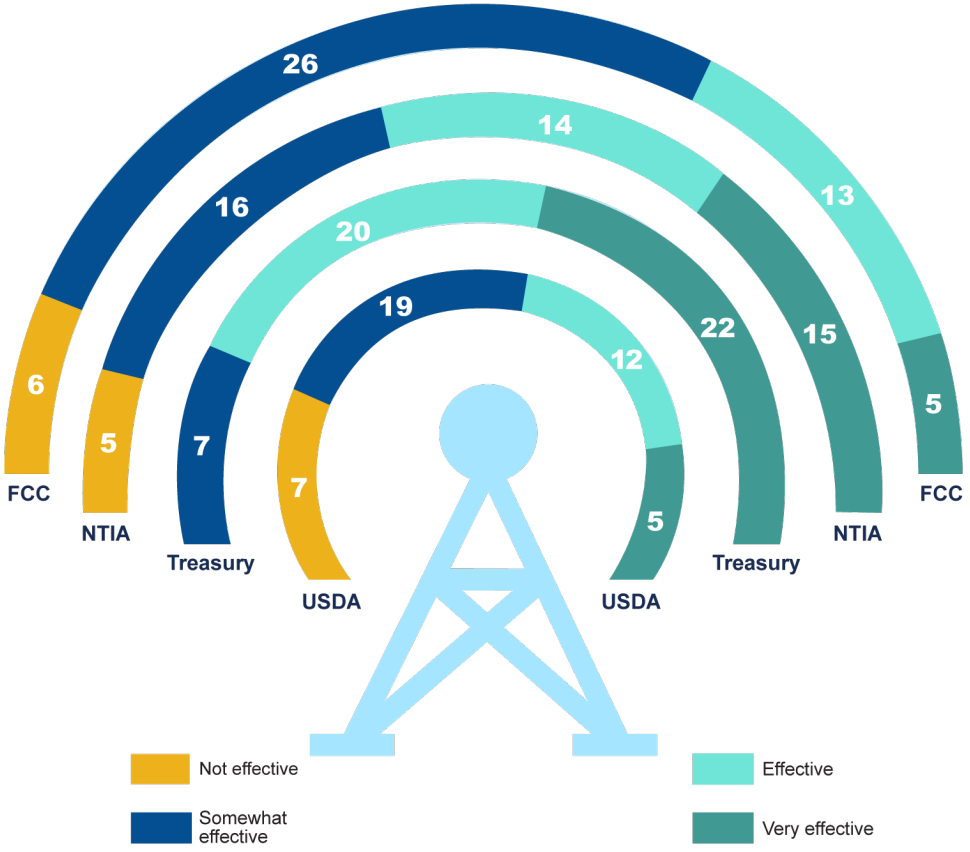
State broadband offices we surveyed provided their perspectives about specific aspects of the federal agencies' coordination on federal broadband funding. As described below, the state offices that responded to our survey reported on how effective they viewed overall coordination, as well as their satisfaction with agencies' expertise and timeliness; how helpful they viewed the different methods agencies used to coordinate; and how effective they viewed coordination on the different topics on which agencies provided coordination.[59]

Overall coordination. When asked how they would characterize overall agency coordination efforts, most state broadband offices responded they would characterize Treasury officials' coordination as effective or very effective, and many responded that NTIA officials' coordination was effective or very effective (see fig. 2).[60] In contrast, many state offices responded that they would characterize FCC and USDA officials' coordination as effective or somewhat effective.

[59]We conducted a survey of broadband offices in 56 states and territories and received 51 responses.

[60]We use "most" to indicate 40-51 states, "many" for 26-39, "some" for 13-25, and "few" for one-12. For questions on satisfaction, we used a five-point scale. For clarity in reporting, we established two combined categories. For dissatisfied, we combined "very" dissatisfied and "somewhat" dissatisfied to report dissatisfied. "Neither satisfied or dissatisfied" is the neutral response, and we combined "somewhat" satisfied and "very" satisfied into the satisfied response.

Figure 2: State and Territory Broadband Office Views on Federal Agency Coordination with States and Territories on Federal Broadband Programs



Source: GAO analysis of survey results. | GAO-25-107207

Note: Fifty-one of 56 state and territory broadband offices completed our survey on state and territory views of coordination by the Federal Communications Commission (FCC), National Telecommunications and Information Administration (NTIA), and Departments of Agriculture (USDA) and the Treasury. Of those 51, one did not respond to this question. USDA and Treasury responses will not total 50 due to "not applicable" responses.

Expertise. In general, state broadband offices indicated they are satisfied with agency officials' expertise in facilitating coordination with them on federal broadband programs. Specifically, most state broadband offices are satisfied with Treasury coordinating officials' expertise, many are satisfied with FCC and NTIA officials' expertise, and the majority of the offices that indicated coordinating with USDA are satisfied with USDA

officials' expertise.[61] For instance, one office responded that Treasury officials' overall expertise has been instrumental in advancing its broadband goals. Further, the office stated that the insights that Treasury officials provided helped it identify its priorities and align its initiatives with available funding and helped it effectively address its unique challenges. This office also mentioned the expertise of NTIA officials as an aspect of coordination that has made the process of working with federal broadband funding seamless.

Timeliness. In general, the majority of state broadband offices reported they are satisfied with the speed with which coordinating officials from three of the four federal agencies responded to their offices' questions, inquiries, and requests. Specifically, most state offices are satisfied with Treasury officials' timeliness; many are satisfied with FCC and NTIA officials' timeliness; and, of those who indicated they have coordinated with USDA, about one-third responded they are satisfied with USDA officials' timeliness.

Methods and topics. We found that overall, state broadband offices characterized the various methods FCC, NTIA, and Treasury used to coordinate as helpful or very helpful, while they had mixed views on the helpfulness of USDA officials' methods of coordination. Among the most helpful methods identified by state broadband offices were assigned points-of-contact; opportunities to interact through in-person, recurring, and virtual meetings; and phone and email correspondence. However, offices had mixed views on the effectiveness of agency coordination on specific topics. For example, across responses for FCC, NTIA, and USDA, some or many offices responded that coordination from the agencies on preventing duplicative funding, service areas/project locations, and navigating timelines of competing federal funding was not effective, or somewhat effective. In contrast, many state offices responded that the application guidance that NTIA and Treasury provided was effective, or very effective.

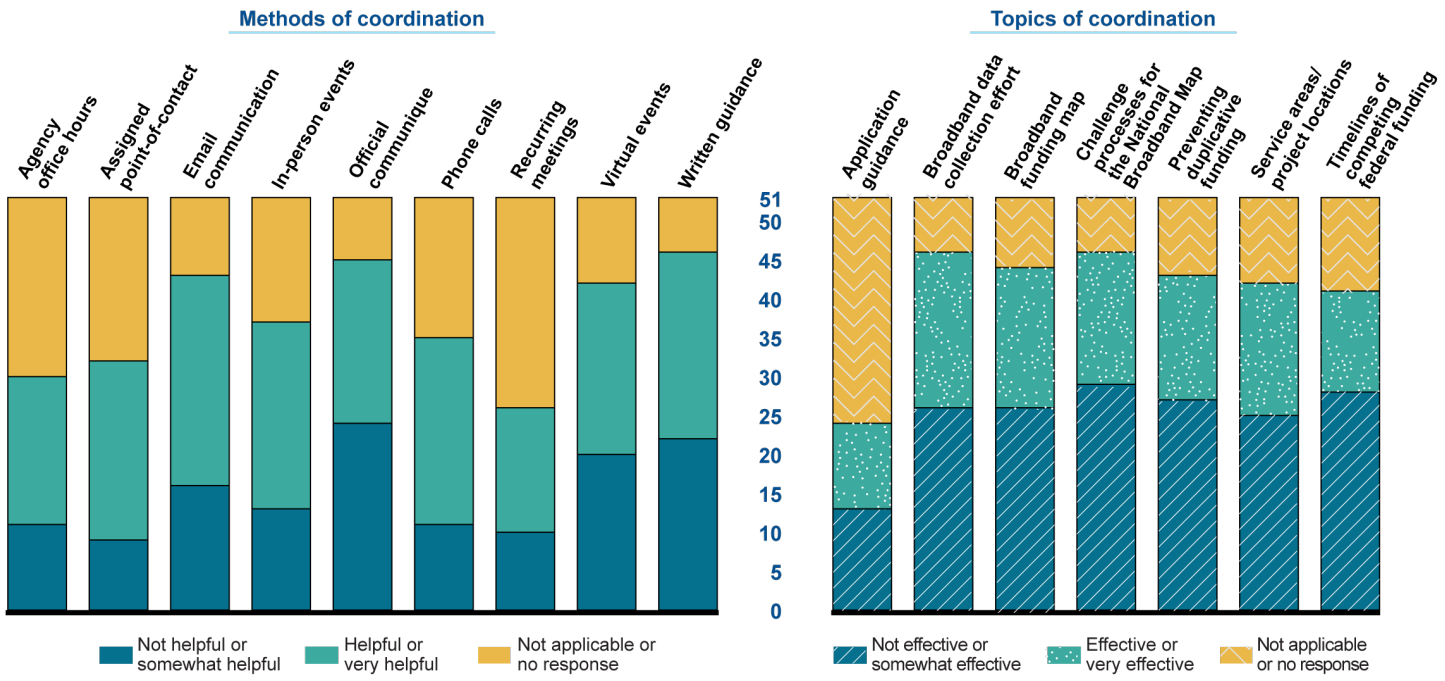
Additional detail on state broadband offices' perspectives on the methods used and the effectiveness of the topics addressed by each of the four

[61]As stated above, USDA coordination with state broadband offices is typically more ad hoc, as its awardees tend to be providers. For multiple questions in our survey, a portion of states responded "not applicable" to coordinating with USDA. Thus, for a given question, the responses regarding USDA typically come from fewer than half of the total survey respondents. For expertise, while 19 of 51 state offices responded "not applicable" to USDA coordinating officials' expertise, 19 of the 32 that did respond reported that they were satisfied with USDA officials' expertise.

federal agencies, as well as their perspectives on the benefits and challenges they experienced coordinating with each agency, follows.

FCC. State broadband office views on the helpfulness of FCC's coordination methods varied, as shown in figure 3. For example, for five of nine methods, some offices responded "not applicable" to having coordinated with FCC officials; still, eight of nine methods received higher responses characterizing the methods as helpful or very helpful rather than not helpful or somewhat helpful. In contrast, many state offices called FCC's coordination on nearly all topics of coordination not effective, or somewhat effective.

Figure 3: State and Territory Broadband Office Views on FCC Coordination with States and Territories on Federal Broadband Programs



Source: GAO analysis of survey results. | GAO-25-107207

Note: Fifty-one of 56 state and territory broadband offices completed our survey on state and territory views of Federal Communications Commission (FCC) officials' coordination with their offices.

One State Broadband Office's Comment from the Survey:

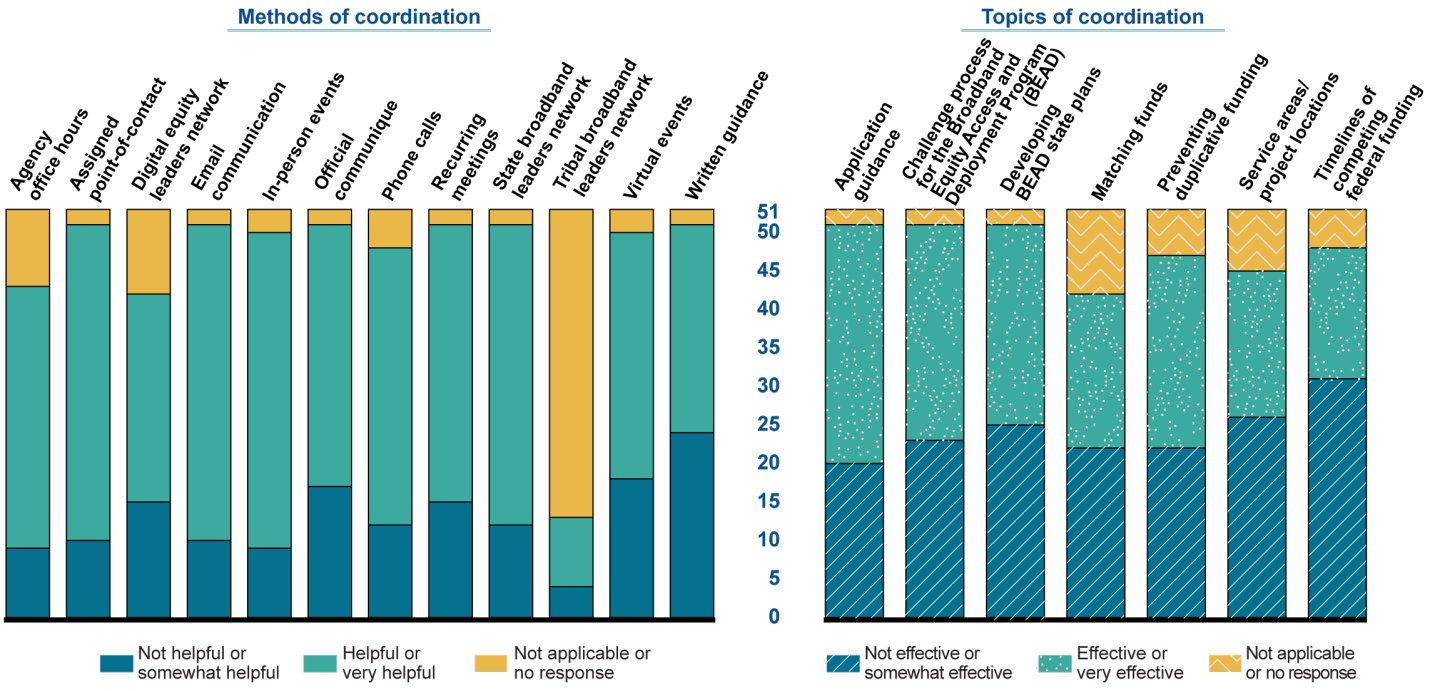
"The Federal Communications Commission's decision to use [a contractor] for the National Broadband Map created challenges because they made data proprietary rather than public. [The contractor] makes it difficult to access data and share it with various stakeholders to inform broadband program decisions and outcomes."

Source: GAO. | GAO-25-107207

When asked about the benefits of FCC's coordination, one state office responded that FCC communication has been a benefit to their office in navigating the map challenge processes. Another state office noted that FCC assistance was helpful when coordinating on the map ahead of NTIA determining BEAD allocations. However, in commenting on any challenges experienced with FCC's coordination, 17 state offices cited challenges with the National Broadband Map challenge process, or accuracy of data in that map or the Broadband Funding Map. For example, one state office responded that coordination with FCC was difficult in discussing what evidence would be considered for map challenges, such as other forms of evidence beyond specific addresses, especially when a provider had admitted to overstating coverage for its entire area within the state. In addition, one office commented that guidance and consistent meetings with FCC were sparse initially but that coordination has improved since 2023.

NTIA. Many state broadband offices responded that almost all of NTIA's coordination methods are helpful, or very helpful, as shown in figure 4. In addition, many state offices characterized NTIA's coordination on the topics of application guidance, the BEAD challenge process, and developing BEAD state plans effective, or very effective. However, many state offices characterized NTIA's coordination on the topics of timelines of competing federal funding and helping them determine service areas and project locations as not effective, or somewhat effective.

Figure 4: State and Territory Broadband Office Views on NTIA Coordination with States and Territories on Federal Broadband Programs



Source: GAO analysis of survey results. | GAO-25-107207

Note: Fifty-one of 56 state and territory broadband offices completed our survey on state and territory views of National Telecommunications and Information Administration (NTIA) officials' coordination with their offices.

One State Broadband Office's Comment from the Survey:

"Because the Broadband Equity, Access, and Deployment program (BEAD) is new, [the National Telecommunications and Information Administration] is still creating guidelines for many aspects of the program. States that are further along in the process could benefit from clear guidance on program requirements. Because broadband offices are hiring new staff, in-person training resources are needed for staff to learn federal requirements. The BEAD Challenge Process was more intensive than imagined. Clear guidelines at the outset could have saved time and resources. The interval between submission and approval is lengthy."

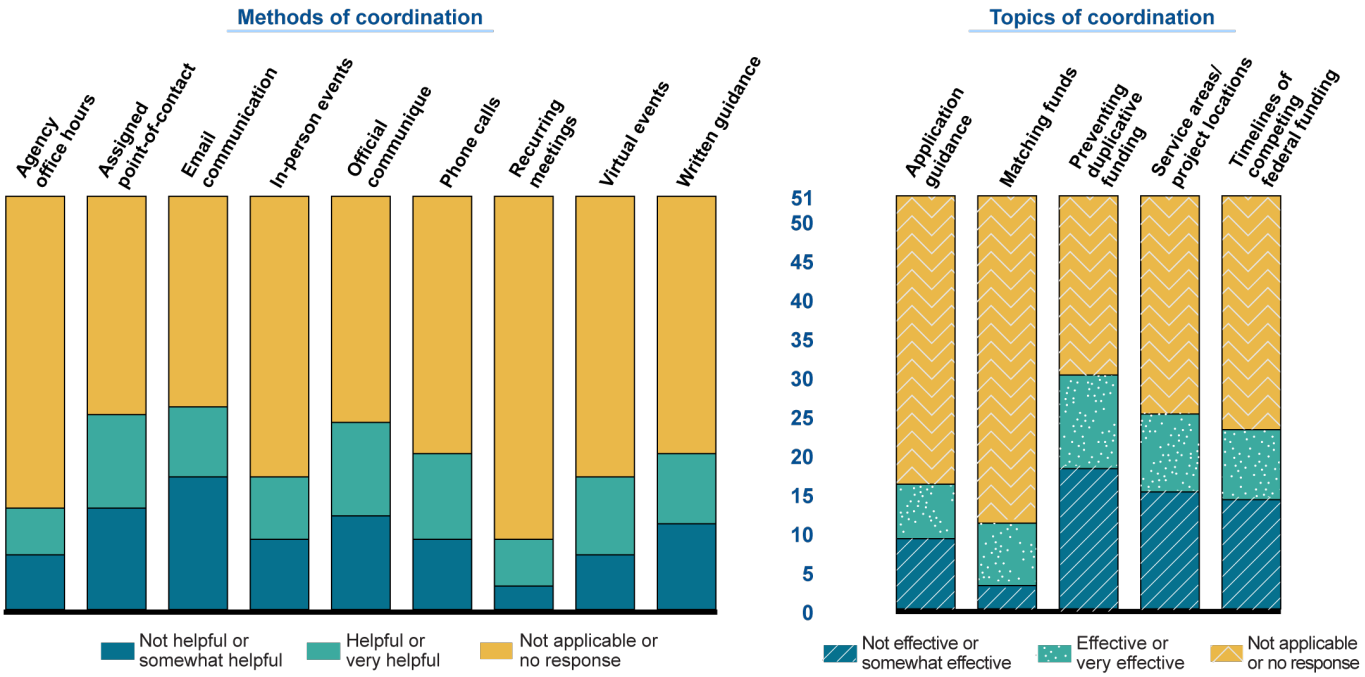
Source: GAO. | GAO-25-107207

When asked about the benefits of coordination from NTIA, one state office cited the convenings of the State Broadband Leaders Network. Another state mentioned its designated NTIA federal program officer as a benefit to coordination. In contrast, when asked about challenges of coordination with NTIA, 22 state offices cited delayed, inconsistent, or unclear BEAD guidance as a challenge. In addition, 14 offices cited long BEAD implementation timelines, or delayed approval processes, as challenges. For example, one state office commented that NTIA issued guidance after certain aspects of the BEAD program had already been approved and did not have guidance as to how state offices could revise their state BEAD plans to accommodate the changes. Another office also noted that approval delays have been a challenge, citing that it took 10 months for NTIA to approve its BEAD initial state plan.

USDA. State broadband office perspectives were varied on the helpfulness of USDA's coordination methods. About one-third or more of offices indicated "not applicable" to questions about USDA (see fig. 5). Of the nine methods, state offices' responses on helpfulness for those that did respond were almost evenly distributed on nearly all methods. In addition, more state offices generally responded that USDA's coordination across topics was either not effective, or somewhat effective, as compared with those that reported it was effective, or very effective. The topics that were most frequently reported as not effective or somewhat effective were preventing duplicative funding, navigating service areas and project locations, and timelines of competing federal funding.[62]

[62]While there were more "not applicable" responses from state offices regarding coordinating with USDA on all topics, those that did respond gave higher responses for not effective, or somewhat effective.

Figure 5: State and Territory Broadband Office Views on USDA Coordination with States and Territories on Federal Broadband Programs



Source: GAO analysis of survey results. | GAO-25-107207

Note: Fifty-one of 56 state and territory broadband offices completed our survey on state and territory views of Department of Agriculture (USDA) officials' coordination with their offices.

One State Broadband Office's Comment from the Survey:

"The coordination and communication for [the 5th round of] ReConnect to avoid overlapping funding was greatly improved compared to previous ReConnect and [other Rural Utilities Service] awards."

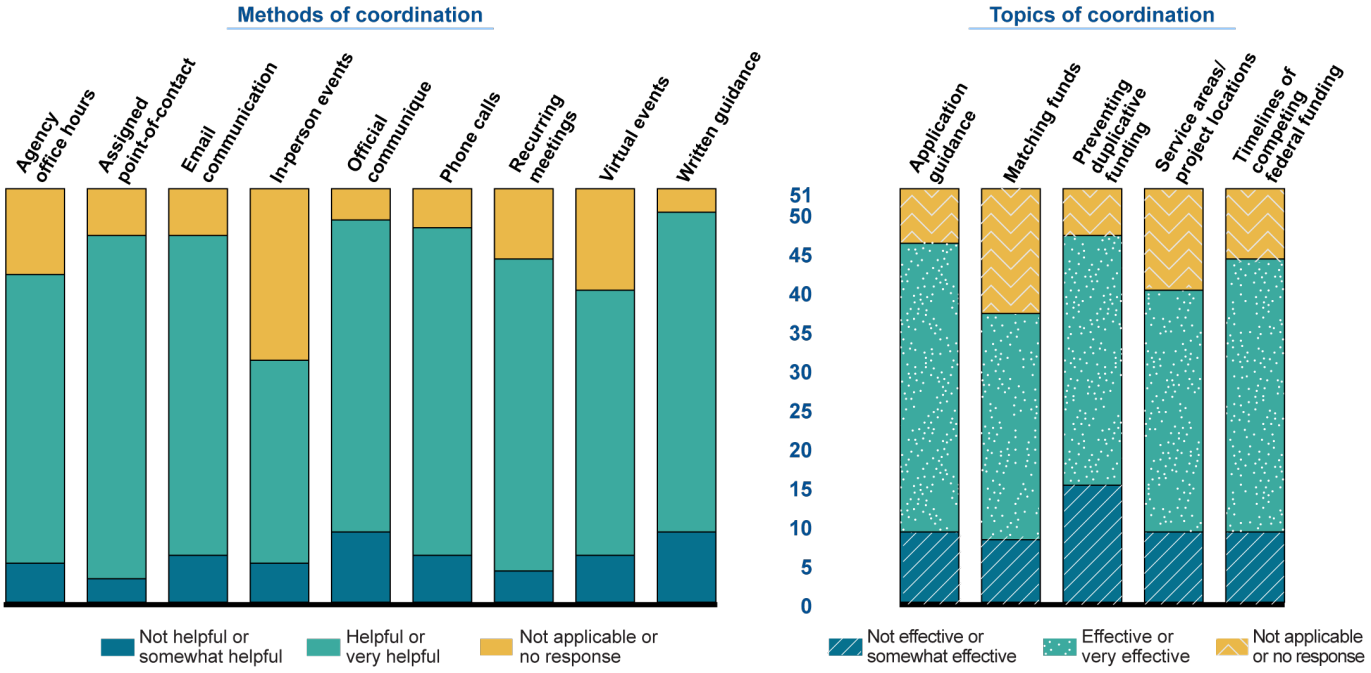
Source: GAO. | GAO-25-107207

When asked about benefits of coordination from USDA, one state office commented that it has been beneficial that USDA directly sends emails with deadlines and the location files it needs to review its state's projects. Another state office identified coordination with the general field representative as a benefit, stating that the representative has been in constant coordination with its office about USDA programs. However, state offices also cited challenges with USDA's coordination. For example, one state office commented that USDA's coordination did not help it navigate the overlapping timelines of ReConnect and BEAD, especially for understanding where funded ReConnect projects would be located to avoid duplicative or overlapping funding once BEAD is implemented. Although some state offices provided comments on the challenges of coordinating with USDA, one office commented that coordination had improved in recent months prior to our survey.

Treasury. Most state broadband offices responded that six of nine methods Treasury uses to coordinate with them are helpful, or very helpful, and many reported the other three of nine methods were helpful,

or very helpful, as shown in figure 6. In addition, many state offices called Treasury's coordination on all the specified topics effective, or very effective, particularly application guidance, preventing duplicative funding, and timelines of competing funding.

Figure 6: State and Territory Broadband Office Views on Treasury Coordination with States and Territories on Federal Broadband Programs



Source: GAO analysis of survey results. | GAO-25-107207

Note: Fifty-one of 56 state and territory broadband offices completed our survey on state and territory views of Department of the Treasury officials' coordination with their offices.

One State Broadband Office's Comment from the Survey:

"We have a great point of contact with Treasury who is typically available to answer questions and provides helpful guidance. They seem to have a good team who works well together and we benefit from that."

Source: GAO. | GAO-25-107207

When asked about the benefits of Treasury's coordination, one state office identified clear program guidance as a benefit of the coordination Treasury officials provided. Further, one office said Treasury's guidance on CPF program compliance and reporting requirements has streamlined its processes, allowing it to focus more on implementation and community impact. Nine state offices mentioned that the flexibility of CPF and SLFRF program requirements were beneficial to coordinating with Treasury. Further, at least one office noted that Treasury's programs allowed more

autonomy for states to develop their programs or quickly release funds.[63] In contrast, in commenting on challenges with Treasury's coordination, one state office commented that one challenge was that guidance came out more than a year after the program was established and it had already issued its CPF funds.

In addition, state broadband offices provided suggestions for improving the agencies' coordination, including the following:

- **FCC.** One state office suggested that FCC include state broadband offices' input in developing its programs, beyond the public comment process. Another office suggested that FCC provide a more defined role for the point of contact, such as for its different efforts (e.g., the Broadband Data Collection and High Cost program). Another office suggested greater accountability for internet service providers in reporting broadband availability data to FCC's National Broadband Map.
- **NTIA.** One state office suggested that NTIA expedite the release of its guidance, with another office commenting that guidance should be drafted well in advance of the next stage of the BEAD program. In addition, one office suggested that NTIA shorten its review and approval timelines as a way to improve the overall program. Further, several offices suggested that NTIA recognize states' expertise and listen to states' needs or provide more flexibility to allow states to design policy solutions.
- **USDA.** One state office suggested that USDA increase coordination directly with state broadband offices, with another office suggesting that USDA provide continued communication with the state offices before making awards. Another state office commented that USDA previously required a certification from the state broadband office for ReConnect projects planned in the state, which enhanced coordination among state and federal agencies and promoted awareness of potential projects.
- **Treasury.** One state office suggested that Treasury clarify the closeout process for SLFRF and CPF. Two other state offices focused

[63]The flexibility and autonomy states referenced are likely influenced by the underlying statutes establishing the CPF and SLFRF programs. For example, as explained by Treasury officials, the state, territory, or local government recipients of CPF or SLFRF funds choose which projects to fund. For the other main programs discussed in this report besides NTIA's BEAD program, the funding agency chooses the projects. Additionally, the CPF and SLFRF programs do not include as many requirements for the states as BEAD, which includes requirements, such as for states to implement a challenge process. *See* 42 U.S.C. §§ 802–04 (CPF and SLFRF) and 47 U.S.C. § 1702 (BEAD).

their suggestions on more specific aspects of coordination. Specifically, one state office suggested that Treasury continue aligning its programs with other federal agencies' programs to ensure that award areas do not overlap. The second state office suggested that Treasury facilitate opportunities for states to engage with each other around challenges and best practices associated with implementing CPF-funded programs, similar to NTIA's State Broadband Leaders Network.

Despite these suggestions, several state broadband offices also commented in their responses to our survey that agency coordination efforts have been improving within the dates we conducted the survey. Indeed, agency officials told us that they recognize the importance of coordinating with the state offices and will continue to coordinate and enhance efforts with them. For example, FCC officials told us that they recognize the importance of coordinating with states and territories on the agency's broadband mapping efforts and are continuously incorporating lessons learned in doing so. NTIA officials told us they welcome the suggestions to improve coordination that state broadband offices provided in our survey as NTIA continues to implement BEAD and other programs. Similarly, USDA officials told us they continue to take steps to enhance coordination with states on federal broadband funding, such as by identifying a point of contact for each state and territory. Finally, Treasury officials told us that they view their coordination with states and territories for CPF and SLFRF as a success but that Treasury may not have a role in future broadband funding, since these programs are ending.

In addition to federal coordination with states and territories on federal broadband programs, we have previously reported that Tribes are also affected by the fragmented nature of federal broadband programs, including those administered by FCC, NTIA, USDA, and Treasury.[64] Through responses to our survey, we found that many state broadband offices are coordinating with Tribes on federal broadband programs. Specifically, some state offices shared that they have worked with Tribes to provide technical assistance or guidance, such as for NTIA's Tribal Broadband Connectivity Program or USDA's ReConnect program. In addition, NTIA maintains the Tribal Broadband Leaders Network to facilitate coordination with the tribal community. Officials from the four agencies also told us that they coordinate with Tribes through other avenues, such as through other federal agencies and nongovernmental

[64]GAO, *Tribal Broadband: National Strategy and Coordination Framework Needed to Increase Access*, GAO-22-104421 (Washington, D.C.: June 22, 2022).

organizations. However, three stakeholders we interviewed told us that sustainability of broadband networks over time remains a challenge in the tribal community, with one stating that this issue requires enhanced federal coordination with Tribes. To address the sustainability of tribal broadband networks, we previously recommended that NTIA provide technical assistance to Tribes throughout the TBCP funding period to support recipients that are unable to implement their financial sustainability plans.[65]

Conclusions

Since 2020, Congress has appropriated tens of billions more dollars to further expand broadband access and bridge the nation's digital divide. While FCC, NTIA, USDA, and Treasury have had success in increasing the number of people with access to broadband, millions of Americans remain without service. The agencies—and the billions of dollars they oversee for broadband deployment—require reliable broadband availability data to effectively and efficiently select deployment projects to fund or otherwise administer their programs. While the primary source of those availability data for most of these agencies is FCC's National Broadband Map, FCC has not formally documented or evaluated the validation, verification, audit, and referral processes it uses to ensure the quality of those data. Not documenting or evaluating the data's quality controls adds both to the risk that agencies leveraging these data cannot effectively target funding to areas that lack high-speed internet and to users' existing concerns about the data's reliability.

Additionally, as FCC, NTIA, USDA, and Treasury continue to coordinate with each other to administer the billions in federal funding for broadband deployment, they can benefit from enhancing some of the mechanisms they use to coordinate. Specific enhancements include defining "covered data" in their information-sharing MOU; establishing timelines on when to provide data on funded awards to the Broadband Funding Map; and—in the case of FCC, NTIA, and USDA—a formal process for their de-duplication of federal funding. Clearly agreeing upon and formally documenting written guidance in these three areas would better position the agencies to sustain their collaboration, manage fragmented federal broadband efforts, and ensure that the considerable federal broadband funding is spent efficiently and effectively.

Recommendations for Executive Action

We are making a total of 14 recommendations, including six to FCC, three to NTIA, three to USDA, and two to Treasury. Specifically:

[65]GAO-24-106541.

The Chair of FCC should, for its Broadband Data Collection, formally document FCC's internal policies and procedures for conducting validations, verifications, and audits of the broadband availability data FCC collects and making enforcement referrals. (Recommendation 1)

The Chair of FCC should assess and document the results of its Broadband Data Collection monitoring to identify any deficiencies in its data validations, verifications, audits, and enforcement referrals processes. (Recommendation 2)

The Chair of FCC should take steps to remedy any deficiencies it identifies in FCC's monitoring of Broadband Data Collection validations, verifications, audits, and enforcement referrals. (Recommendation 3)

The Chair of FCC, in collaboration and agreement with NTIA, USDA, and Treasury, as appropriate, should clearly define and document the scope of what "covered data" (as referenced in the agencies' information-sharing MOU) includes. (Recommendation 4)

The Chair of FCC, in collaboration and agreement with NTIA, USDA, and Treasury, as appropriate, should clearly define and document timelines for agencies to submit data on funded awards to the Broadband Funding Map, including any changes to awards. (Recommendation 5)

The Chair of FCC, in collaboration and agreement with NTIA, USDA, and Treasury, as appropriate, should clearly define and formally document the agencies' broadband funding de-duplication process. (Recommendation 6)

The NTIA Administrator, in collaboration and agreement with FCC, USDA, and Treasury, as appropriate, should clearly define and document the scope of what "covered data" (as referenced in the agencies' information-sharing MOU) includes. (Recommendation 7)

The NTIA Administrator, in collaboration and agreement with FCC, USDA, and Treasury, as appropriate, should clearly define and document timelines for agencies to submit data on funded awards to the Broadband Funding Map, including any changes to awards. (Recommendation 8)

The NTIA Administrator, in collaboration and agreement with FCC, USDA, and Treasury, as appropriate, should clearly define and formally document the agencies' broadband funding de-duplication process. (Recommendation 9)

The Secretary of Agriculture, in collaboration and agreement with FCC, NTIA, and Treasury, as appropriate, should clearly define and document

the scope of what "covered data" (as referenced in the agencies' information-sharing MOU) includes. (Recommendation 10)

The Secretary of Agriculture, in collaboration and agreement with FCC, NTIA, and Treasury, as appropriate, should clearly define and document timelines for agencies to submit data on funded awards to the Broadband Funding Map, including any changes to awards. (Recommendation 11)

The Secretary of Agriculture, in collaboration and agreement with FCC, NTIA, and Treasury, as appropriate, should clearly define and formally document the agencies' broadband funding de-duplication process. (Recommendation 12)

The Secretary of the Treasury, in collaboration and agreement with FCC, NTIA, and USDA, as appropriate, should clearly define and document the scope of what "covered data" (as referenced in the agencies' information-sharing MOU) includes. (Recommendation 13)

The Secretary of the Treasury, in collaboration and agreement with FCC, NTIA, and USDA, as appropriate, should clearly define and document timelines for agencies to submit data on funded awards to the Broadband Funding Map, including any changes to awards. (Recommendation 14)

Agency Comments and Our Evaluation

We provided a draft of this report to FCC and the Departments of Commerce, Agriculture, and the Treasury for review and comment. We received written comments from FCC, USDA, and Treasury, which are summarized below. FCC, NTIA, USDA, and Treasury also provided technical comments, which we incorporated as appropriate.

In its comments, reproduced in appendix III, FCC agreed with our six recommendations and described its plans to address each one. For example, regarding our second recommendation related to assessing and documenting the results of its Broadband Data Collection monitoring, FCC noted it will develop documented processes to ensure the results of verifications and audits are recorded and used to identify deficiencies in these processes, including opportunities for improvement. Regarding our fourth recommendation related to clearly defining and documenting the scope of covered data, FCC noted it will work with the other agencies to memorialize a common definition that can be applied across separate, statutorily mandated broadband programs.

In its comments, reproduced in appendix IV, USDA neither agreed nor disagreed with our three recommendations. USDA's Rural Utilities Service provided information to, according to the letter, clarify the report's general finding with respect to USDA's interactions with states and territories. USDA noted that state broadband offices that responded to our survey about agencies' coordination with states and territories had mixed

feedback about USDA. USDA stated the key difference between it and some of the other agencies in our review is that USDA makes funding awards directly to broadband providers as opposed to states. USDA noted that, despite this, it shares information about its awards during the entire application and award process and has taken steps to expand those efforts. For example, according to USDA, in the past year USDA provided every state broadband office with a listing of submitted applications and proposed funded service areas for review. Our report notes the differences in agencies' funding recipients and acknowledges this as a distinction in relation to coordination with states and territories. Our report also acknowledges that USDA officials told us that coordination with the state offices has increased throughout 2024 and that they continue to enhance coordination.

In its comments, reproduced in appendix V, Treasury agreed to address our two recommendations. In particular, Treasury stated it will address the recommendations by providing FCC, NTIA, and USDA with copies of relevant funding recipient program guidance. According to Treasury, this guidance includes information on what data Treasury collects from recipients and on what cadence, information which Treasury considers to be the covered data that it shares with other agencies and reports to the Broadband Funding Map. Treasury further noted that it believes this existing guidance is sufficient to address the recommendations. Given that the other agencies rely on shared data, including Treasury data, to maximize the value of their broadband funding, we continue to believe that it is important for Treasury to be part of conversations with the other agencies to provide clarity on what data it can provide and when. For example, although Treasury may not wish to change the content or frequency of its recipient reporting requirements, as stated in its comments, it can still clarify on what timeframes it can provide this data for inclusion on the map after its internal reviews and revision period.

The Department of Commerce did not provide written comments. NTIA, however, in its technical comments, stated that it agreed with our three recommendations and will prepare a formal action plan upon issuance of our final report.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 11 days from the report date. At that time, we will send copies to the appropriate congressional committees; the Chair of FCC; the Secretaries of Commerce, Agriculture, and the Treasury; and other interested parties. In addition, the report will be available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at vonaha@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix VI.

//SIGNED//

Andrew Von Ah
Director, Physical Infrastructure

Appendix I: Objectives, Scope, and Methodology

This report examines (1) the sources of broadband availability information selected agencies use and the extent to which the Federal Communications Commission (FCC) ensures the quality of data in its National Broadband Map, (2) the extent to which selected agencies' efforts to coordinate their administration of broadband funding programs align with our leading practices for interagency collaboration, and (3) how selected agencies have coordinated with state and territory governments regarding broadband funding and those governments' perspectives on that coordination.

We focused our review on the four federal agencies that signed a memorandum of understanding (MOU) in 2022 stating that they would share information with each other regarding broadband derived from their funding programs: FCC, the National Telecommunications and Information Administration (NTIA), and the Departments of Agriculture (USDA) and the Treasury. We reviewed activities undertaken by these agencies since 2022, when we last reported on federal broadband programs broadly.[1] When reviewing the agencies' activities, we focused on those programs whose main purpose is to fund broadband deployment and, among those deployment programs, those that had funds yet to distribute at the time of our review.[2] This included FCC's High Cost program; NTIA's Broadband Equity, Access, and Deployment (BEAD) and Tribal Broadband Connectivity programs; and USDA's ReConnect and Community Connect programs.[3] We also included Treasury's Coronavirus Capital Projects Fund (CPF) and State and Local Fiscal Recovery Funds (SLFRF) programs due to the significant amount of funds being used for broadband investment, although funding broadband is only one possible purpose of these programs.

To address all three objectives, we reviewed documentation and interviewed officials from FCC, NTIA, USDA, and Treasury. For example, we reviewed documentation related to their broadband funding programs to identify the sources of broadband availability information the agencies use when making funding decisions, particularly FCC's National Broadband Map and information supplied by program applicants or

[1]GAO, *Broadband: National Strategy Needed to Guide Federal Efforts to Reduce Digital Divide*, GAO-22-104611 (Washington, D.C.: May 31, 2022).

[2]In contrast, broadband deployment is only one possible use of some programs' funds, and other programs fund broadband affordability or some other broadband-related activity.

[3]We derived information on the programs whose main purpose is to fund broadband deployment from our inventory of federal broadband programs detailed in GAO-22-104611.

recipients. We also reviewed documents related to this availability information, such as data collection and review processes, policies, and procedures. We reviewed coordination-related documents (such as interagency agreements and memorandums, meeting minutes and agendas, and correspondence) and agency program documentation, such as orders, guidance, and notices of funding opportunities. We reviewed our previous reports on federal broadband programs and applicable statutes, such as those that established recently created federal broadband programs and those that mandated our selected agencies to take actions related to broadband availability data and interagency coordination.

To address our first objective, due to USDA's use of general field representatives to conduct on-the-ground reviews for some of its program applicants, we also conducted a site visit to observe an example of a USDA official reviewing the quality of broadband availability information supplied by applicants. Specifically, we observed a USDA official reviewing applicant information for a potential project located in southwest Virginia. We selected this area for in-person observation due to the presence of our staff who work in relatively close proximity to the project location. To evaluate FCC's efforts to ensure the quality of the broadband availability data FCC collects from internet service providers for use in the National Broadband Map, we compared FCC's practices against relevant federal internal control standards related to monitoring controls and documenting responsibilities in policies.[4]

To address our second objective, we compared the agencies' coordination mechanisms and activities against the eight leading practices for interagency collaboration that we identified in our prior work.[5] Each of these practices contains key considerations, and we analyzed whether the mechanisms and activities taken together reflected the relevant considerations. On the basis of these assessments, we determined each practice to be either generally followed, where the mechanisms and activities followed most, or all, aspects of the key considerations that we examined, or partially followed, where the mechanisms and activities followed some, but not most, aspects of the key considerations examined. Specifically, two analysts reviewed the evidence related to each selected practice and independently provided a

[4]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

[5]GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges,* GAO-23-105520 (Washington, D.C.: May 24, 2023).

rating as to whether interagency coordination efforts generally followed, partially followed, or did not follow each practice.

To address our third objective, we surveyed all 50 states, five U.S. territories, and the District of Columbia (hereafter, states and territories). Specifically, to gather state and territory government views on the coordination they have received from these four agencies for the purposes of federal broadband programs, we conducted a web-based survey of all state and territory broadband offices from August 8, 2024, through November 14, 2024. Fifty-one of 56 states or territories completed the online questionnaire.[6]

To minimize errors arising from differences in how questions might be interpreted and to reduce variability in responses due to misinterpretation, we conducted pretests with officials from five states and territories. We selected the pretest participants to reflect variability in the following characteristics: entity type (office, agency, etc.), geographic representation, tribal governments present in geographic area, and at least one territory. We revised our survey based on feedback we obtained during these discussions. To reduce nonresponse bias, we followed up by phone or email with states and territories that had not responded to the survey to encourage them to complete it. After closing the web survey, we reviewed the 51 completed questionnaires to check for data entry errors, missing values, and unclear responses.

Our survey contained a mixture of closed- and open-ended questions. We analyzed the responses to the closed-ended questions to report counts. For the open-ended questions, we reviewed the responses for illustrative examples or recurring comments. We conducted a content analysis of states' responses to the question about challenges experienced with FCC and NTIA. We conducted this analysis of responses to this question and for these two agencies due to the issues we found during the course of audit work for our first and second objective related to FCC's mapping efforts (which are detailed in this report) and due to the BEAD program representing approximately $42 billion in federal funding. Therefore, we determined it prudent to review states' responses related to these areas.[7]

[6]The state broadband offices from Alaska, Guam, Nevada, New York, and Texas did not respond to our survey.

[7]We did not conduct a complete content analysis of states' responses for the question about challenges with Treasury and USDA because Treasury has obligated all CPF and SLFRF funding, and due to the ad hoc nature of USDA's coordination with states and territories and the presence of more "not applicable" responses related to USDA.

Finally, to gather additional perspectives on all our objectives, we interviewed representatives from 10 stakeholder organizations selected to obtain a mixture of research, advocacy, industry, and governmental organizations. Because stakeholders vary in their expertise with various topics, not every stakeholder provided an opinion on every topic. Accordingly, their views are not generalizable to those of all stakeholders, though they provided us with a variety of perspectives. See table 3 for a list of the stakeholder organizations we interviewed.

Table 3: Stakeholder Organizations Interviewed and Organization Type

Organization	Type
Benton Institute for Broadband and Society	Advocacy
BroadbandNow	Research
The Internet and Television Association (NCTA)	Industry
National Association of Telecommunications Officers and Advisors (NATOA)	Municipal
National Digital Inclusion Alliance (NDIA)	Advocacy
National Governors Association (NGA)	State
National Tribal Telecommunications Association (NTTA)	Tribal
The Pew Charitable Trusts	Research
The Rural Broadband Association (NTCA)	Industry
Tribal Ready	Tribal

Source: GAO. | GAO-25-107207

We conducted this performance audit from December 2023 to April 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Basis, Purpose, and Reported Appropriations and Obligations for Selected Federal Broadband Programs

This table lists federal programs that (1) support broadband as their main purpose, (2) provide funds for broadband deployment, and (3) received appropriations and obligated funds in fiscal years 2021 through 2024. Additionally, due to the significant amount of funds available from Department of the Treasury programs, the table also includes Treasury programs that (1) support broadband as one possible purpose, (2) provide funds for broadband deployment, and (3) received appropriations and obligated funds in fiscal years 2021 through 2024. While the programs in this table provide funds for broadband deployment, some of these programs also provide funds for other uses, such as increasing broadband affordability.

Table 4: Basis, Purpose, and Reported Appropriations and Obligations for Selected Federal Broadband Programs

Program	Amounts appropriated for fiscal years 2021–2024	Amounts obligated in fiscal years 2021–2023	Statutory basis	Purpose or goals stated by agency
National Telecommunications and Information Administration				
Broadband Equity, Access, and Deployment Program (BEAD)	$42.45 billion	$255.8 million	Infrastructure Investment and Jobs Act (IIJA) § 60102[a]	“The BEAD Program provides new federal funding . . . for broadband planning, deployment, mapping, equity, and adoption activities.” Notice of Funding Opportunity, NTIA-BEAD-2022.
Enabling Middle Mile Broadband Infrastructure Program	$1 billion	$979.998 million	IIJA § 60401[b]	“The purpose of the grant program is to expand and extend middle mile infrastructure to reduce the cost of connecting areas that are unserved or underserved to the internet backbone.” Notice of Funding Opportunity, NTIA-MMG-2022.
Tribal Broadband Connectivity Program (TBCP)	$3 billion	$1.865 billion	Consolidated Appropriations Act, 2021, div. N, § 905(c) (as amended by IIJA § 60201)[c]	“The purpose of the TBCP is to improve the quality of life, spur economic development and commercial activity, and create opportunities for remote employment, online entrepreneurship, remote learning, and telehealth by expanding broadband access and by providing digital training and inclusion programs to Native American communities.” Notice of Funding Opportunity, NTIA-ICG-TBCPO-2023-2008098.
Broadband Infrastructure Program	$300 million	$282.875 million	Consolidated Appropriations Act, 2021, div. N, § 905(d)[d]	“The purpose of the Broadband Infrastructure Program is to provide federal funding to deploy broadband infrastructure to eligible service areas of the country.” Notice of Funding Opportunity, NTIA-Broadband-Infrastructure-Program-2021.

Program	Amounts appropriated for fiscal years 2021–2024	Amounts obligated in fiscal years 2021–2023	Statutory basis	Purpose or goals stated by agency
Federal Communications Commission[e]				
High-Cost Program	$17.881 billion	$14.305 billion	47 U.S.C. § 254	"The goals are: (1) preserve and advance universal availability of voice service; (2) ensure universal availability of modern networks capable of providing voice and broadband service to homes, businesses, and community anchor institutions; (3) ensure universal availability of modern networks capable of providing advanced mobile voice and broadband service; (4) ensure that rates for broadband services and rates for voice services are reasonably comparable in all regions of the nation; and (5) minimize the universal service contribution burden on consumers and businesses." 26 FCC Rcd. 17663 (2011).
E-rate Program	$9.671 billion	$9.157 billion	47 U.S.C. § 254	"The three goals we adopt for the E-rate program are: (1) ensuring affordable access to high-speed broadband sufficient to support digital learning in schools and robust connectivity for all libraries; (2) maximizing the cost-effectiveness of spending for E-rate supported purchases; and (3) making the E-rate application process and other E-rate processes fast, simple and efficient." 29 FCC Rcd. 8870 (2014).
Rural Health Care Program: Health Care Connect Fund	$1.785 billion	$2.180 billion	47 U.S.C. § 254	"The goals are (1) increasing access to broadband for [health care providers], particularly those serving rural areas; (2) fostering the development and deployment of broadband health care networks; and (3) maximizing the cost-effectiveness of the program." 27 FCC Rcd. 16678 (2012).
U.S. Department of Agriculture[f]				
Rural eConnectivity [ReConnect] Program	$3.512 billion	$3.969 billion[g]	Consolidated Appropriations Act, 2018, div. A, § 779[h]	ReConnect "provides funding in the form of loans, grants, and loan/grant combinations for the costs of construction, improvement, or acquisition of facilities and equipment needed to facilitate broadband deployment in rural areas. One of the essential goals of the Program is to expand broadband service to rural areas that do not have sufficient access to broadband." 7 C.F.R. § 1740.1(a).

Program	Amounts appropriated for fiscal years 2021–2024	Amounts obligated in fiscal years 2021–2023	Statutory basis	Purpose or goals stated by agency
Telecommunications Infrastructure Program	$2.62 billion[i]	$194.446 million	7 U.S.C. § 935(d)(2)	"The program's purpose is to furnish and improve telecommunications services, including a wide array of telecommunications related services, in rural areas." Rural Utilities Service, 2021 USDA Budget Explanatory Notes, Congressional Justifications.
Community Connect Grant Program	$125 million	$57.157 million	7 U.S.C. § 950bb-3	"The purpose of the Community Connect Grant Program is to provide financial assistance in the form of grants to eligible applicants that will provide, on a 'community-oriented connectivity' basis, broadband service that fosters economic growth and delivers enhanced educational, health care, and public safety benefits." 7 C.F.R. § 1739.1(a).
Appalachian Regional Commission				
Central Appalachia and North Central/North Appalachia Broadband Programs	$100 million[j]	$44.6 million	40 U.S.C. §§ 14321, 14509	"ARC invests in projects that promote the productive and strategic use of broadband and other telecommunications infrastructure to increase connectivity and strengthen economic competitiveness." ARC, Broadband Construction Projects Guidance (2024).
Denali Commission				
Alaska Broadband Program	$2 million[k]	$2.216 million	Denali Commission Act of 1998, § 305[l]	"Eligible projects include those that address the lack of affordable broadband and the structural challenges of providing affordable broadband in rural Alaska." Funding Opportunity Announcement, DC-WP-23-001 (2023).
Department of the Treasury[m]				
Coronavirus Capital Projects Fund	$10 billion	$9.988 billion	42 U.S.C. § 804	"The American Rescue Plan Act of 2021 (American Rescue Plan) established the $10 billion Capital Projects Fund to provide funding to states, territories, and Tribal governments to carry out critical capital projects directly enabling work, education, and health monitoring, including remote options, in response to the public health emergency with respect to the Coronavirus Disease (COVID–19). The focus of the Capital Projects Fund on the continuing need for connectivity in response to the COVID-19 pandemic complements the broader range of uses, including for broadband infrastructure, of the American Rescue Plan's separate $350 billion Coronavirus State and Local Fiscal Recovery Funds." Treasury, Statement on Purpose and Process (May 2021).

Program	Amounts appropriated for fiscal years 2021–2024	Amounts obligated in fiscal years 2021–2023	Statutory basis	Purpose or goals stated by agency
Coronavirus State and Local Fiscal Recovery Funds (SLFRF)	$350 billion	$349.883 billion	42 U.S.C. §§ 802–03	"The purpose of the SLFRF funds is to mitigate the fiscal effects stemming from the COVID–19 public health emergency, including by supporting efforts to stop the spread of the virus." "Specifically, the [act] provides that SLFRF funds may be used…(d) To make necessary investments in water, sewer, or broadband infrastructure." 87 Fed. Reg. 4338 (Jan. 27, 2022).
New Markets Tax Credit Program	$20 billion[n]	$15 billion[o]	26 U.S.C. § 45D	"These investments are expected to result in the creation of jobs and material improvement in the lives of residents of low-income communities. Examples of expected projects include financing small businesses, improving community facilities such as daycare centers, and increasing home ownership opportunities." Internal Revenue Service, New Markets Tax Credit, LMSB-04-0510-016 (May 2010).

Source: GAO analysis of relevant statutes, regulations, and agency information. | GAO-25-107207

[a]Infrastructure Investment and Jobs Act (IIJA), Pub. L. No. 117-58, § 60102, 135 Stat. 429, 1182–1205 (2021).

[b]IIJA, Pub. L. No. 117-58, § 60401, 135 Stat. at 1231–38.

[c]Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, div. N, § 905(c), 134 Stat. 1182, 2138–39 (2020) (as amended by IIJA, Pub. L. No. 117-58, § 60201, 135 Stat. at 1208–09).

[d]Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, div. N, § 905(d), 134 Stat. at 2139–42.

[e]The Federal Communications Commission programs listed are part of the Universal Service Fund, which was authorized as a permanent, indefinite appropriation (i.e., appropriations that, at the time of enactment, are for an unspecified amount and that remain available without further congressional action) based on the fund's receipts. This table lists the total receipts reported by Federal Communications Commission officials for fiscal years 2021 through 2024 as the amounts appropriated. Commission officials also noted that some of the reported obligations exceed the appropriations due to carry-over funds or the Universal Service Fund's exemption from the Antideficiency Act.

[f]This table does not include the U.S. Department of Agriculture's Rural Broadband Program, which agency officials stated was inactive since the fiscal year 2019 application window because of insufficient funds in some years and in anticipation of potential changes in the next reauthorization.

[g]The ReConnect Program includes grants and loans. As explained by department officials, the amount reported as obligated is greater than the amount appropriated because these appropriated funds are not used for the amount a loan recipient borrows. Instead, these appropriated funds cover the loans' subsidy costs, which represent the cost of the loan program. The subsidy costs are calculated based on factors such as the loan disbursements, repayments of principal, interest, and estimated defaults. *See* 2 U.S.C. § 661a(5). Consistent with Office of Management and Budget guidance, the department borrowed funds from Treasury to cover the obligations for the loans' principals. *See* OMB Cir. No. A-11, § 185.2(c).

[h]Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, div. A, § 779, 132 Stat. 348, 399.

[i]Unlike the ReConnect Program, which received lump-sum appropriations for loans' subsidy costs and for grants, the Telecommunications Infrastructure Program received appropriations for the loans' subsidy costs and separate appropriations for the principal amounts to be offered as loans. This table reports the appropriations for the amounts available to be loaned.

[j]These programs are funded through the Appalachian Regional Commission's lump-sum appropriations received in the annual appropriations acts. The numbers reported in this table represent the program breakdown from these lump-sum appropriations for the Central Appalachia and North Central/North Appalachia Broadband Programs, which, according to the Appalachian Regional Commission, is based on congressional guidance from reports accompanying the annual appropriations acts.

[k]These programs are funded through the Denali Commission's lump-sum appropriations received in the annual appropriations acts. The numbers reported in this table represent the program breakdown from these lump-sum appropriations for the Alaska Broadband Program. According to Denali Commission officials, the amount obligated is greater than the amount reported as appropriated because the Denali Commission used carry-over funds from previous years.

[l]Denali Commission Act of 1998, Pub. L. No. 105-277, div. C, tit. III, § 305, 112 Stat. 2681-637, 2681-639–40 (codified as amended at 42 U.S.C. § 3121 note).

[m]This table does not include Treasury's Coronavirus Relief Fund, which originally received $150 billion in appropriations for fiscal year 2020. Treasury obligated approximately $115 million under this program during fiscal years 2021 through 2023, after delays from court orders and for administrative flexibility.

[n]The amount of tax credits available under this program each year is subject to statutory limitations. The amount appropriated reflects the tax credit limitation of $5 billion for each of calendar years 2021 through 2024. The tax credit is also available with a $5 billion limitation for calendar year 2025, in addition to any carryover of unused tax credits under the program from the previous year.

[o]This amount obligated includes the total credits allocated for calendar years 2021 through 2023.

Appendix III: Comments from the Federal Communications Commission

Federal Communications Commission
Washington, D.C. 20554

March 14, 2025

Andrew Von Ah
Director, Physical Infrastructure
Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Mr. Von Ah:

We have reviewed GAO's draft report, "Broadband Programs: Agencies Need to Further Improve Their Data Quality and Coordination Efforts." As the GAO Report notes, the FCC's National Broadband Map is a key source of broadband availability information that enables the FCC and other federal and state agencies to identify locations unserved by broadband when making decisions about where to target broadband deployment funding. We agree with GAO that the Map's reliability and accuracy is therefore important, and that validations, verifications, and audits will play an essential role in assuring the quality of the data. We also agree that interagency coordination is critical to ensuring that the billions of dollars in federal funding committed to broadband deployment achieve their statutory objectives.

The report's first recommendation is, "[t]he Chair of the FCC should, for its Broadband Data Collection, formally document its internal policies and procedures for conducting validations, verifications, audits, and enforcement referral processes." We agree with this recommendation and are taking the following actions to implement it. FCC staff have continued efforts to document the agency's policies and procedures including through an ongoing series of focused process review and documentation meetings. As previously shared with GAO, the FCC also has an open notice and comment rulemaking proceeding that will help to establish additional audit and verification procedures. This review of the processes will be formalized, supplemented with any newly-established Commission rules, and documented consistent with the GAO standards for Internal Control in the Federal Government (Green Book).

The report's second recommendation is, "[t]he Chair of the FCC should, assess and document the results of its Broadband Data Collection monitoring to identify any deficiencies in its data validations, verifications, audits, and enforcement referral processes." We agree with this recommendation and will develop documentation processes to ensure that the results of validations, verifications, audits, and enforcement referrals are recorded and used to identify deficiencies in these processes and opportunities for process improvement.

While we agree that the Commission has more work to do in documenting results and its assessment processes, the FCC has been reviewing the results and assessing the effectiveness of BDC data validations and enforcement referrals to identify process deficiencies. One indicator of the success of these efforts is the steady and dramatic decline in the number of availability challenges filed against the data shown on the map. As GAO notes in the report, approximately 8 million availability challenges were filed between the initial map release in November 2022 and October 2023. This represents challenges to just under 1% of the total services reported as available in the BDC. Between November 2023 and October 2024, just over 2 million availability challenges were filed, representing challenges to just under 0.25% of the total services reported. As of the end of January 2025, under 10,000 challenges have been filed against the June 2024 availability data currently shown on the map.

The report's third recommendation is, "[t]he Chair of the FCC should, take steps to remedy any deficiencies it identifies in its monitoring of Broadband Data Collection validations, verifications, audits, and enforcement referrals." We agree with this recommendation and consistent with resources available to the Commission will continue to undertake steps to remedy any deficiencies identified.

The report's fourth recommendation is, "[t]he chair of FCC, in collaboration and agreement with NTIA, USDA, and Treasury, as appropriate, should clearly define and document the scope of what 'covered data' (as referenced in the agencies' information sharing MOU) includes." We agree with this recommendation and are taking the following actions to implement it. As part of our ongoing, regular coordination meetings, the agencies have held preliminary discussions to define "covered data." To date, the Commission and other agencies have effectively shared data related to the enforceable commitments of our federal broadband funding recipients, including information related to potential defaults or descoped funding awards. Notwithstanding our effective sharing of data, the Commission will work with the other agencies to memorialize a common definition "covered data" that can be applied across our separate, statutorily mandated broadband programs.

The report's fifth recommendation is, "[t]he Chair of FCC, in collaboration and agreement with NTIA, USDA, and Treasury, as appropriate, should clearly define and document timelines for agencies to submit data on funded awards to the Broadband Funding Map, including any changes to awards." We agree with this recommendation and are taking the following actions to implement it. As part of our ongoing coordination, the agencies have regularly discussed the development of best practices that include suggested timelines for data submissions to the BFM.

The report's sixth recommendation is, "[t]he Chair of FCC, in collaboration and agreement with NTIA, USDA, and Treasury, as appropriate should clearly define and formally document the agencies' broadband funding deduplication process." We agree with this recommendation and are taking the following actions to implement it. The agencies are scheduled to discuss the written memorialization of processes and procedures for the deduplication of our federal broadband programs, thus maximizing the most efficient use of federal funds.

Thank you for the opportunity to comment on GAO's recommendations for the Commission.

Sincerely,

/s/ Trent B. Harkrader

Trent B. Harkrader
Acting Chief, Wireline Competition Bureau
Federal Communications Commission

/s/ Jean L. Kiddoo

Jean L. Kiddoo
Chair, Broadband Data Task Force
Federal Communications Commission

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Appendix IV: Comments from the U.S. Department of Agriculture

United States Department of Agriculture

Rural Development

Rural Utilities Service

1400 Independence Ave SW
Room 4121 Stop 1590
Washington, DC 20250

Voice 202.690.4673

SUBJECT: GAO Draft Report: Broadband GAO 107207

TO: Andrew Von Ah
Director, Physical Infrastructure
U.S. Government Accountability Office

FROM: Christopher McLean
Acting Administrator
Rural Utilities Service

CHRISTOPHER MCLEAN
Digitally signed by CHRISTOPHER MCLEAN
Date: 2025.03.26 14:35:18 -04'00'

Thank you for the opportunity to comment on GAO's Draft Report on Broadband Programs and finding that agencies need to improve their data quality and coordination efforts. In addition to our comments below, the attached draft report contains technical comments.

While we appreciate GAO's review and feedback regarding broadband efforts and federal interagency coordination, RUS would like to clarify the general finding of the report with respect to federal coordination efforts with the U.S. States and territories, specifically USDA's interaction with them.

The report's assessment indicates that NTIA and Treasury generally have positive relationships and feedback from the majority of State broadband offices, while the few States that did respond to GAO's questionnaire had mixed feedback about coordination with USDA.

First and foremost, the key difference between USDA's broadband programs and those of the NTIA and Treasury is that the latter agencies do not implement their broadband awards. The NTIA and the Treasury work closely with the States because they provide federal funding directly to the States, who in turn implement the program and obligate funding. In contrast, USDA's awards are made directly to broadband providers across the 50 States and America's territories. While USDA's funding does not go directly to States, that does not suggest that there is no interaction with them. To the contrary, USDA shares information about its awards during the entire application and award process and we have taken steps this year to expand on those efforts.

As an initial step, USDA publishes the proposed service areas of every applicant on its online mapping tool as required by the Rural Electrification Act. Once applications are chosen as viable, the agency starts a 45-day public notice response whereby the public and existing service providers can provide confidential information to the agency with respect to the proposed service areas.

Additionally, as required under our coordination agreements with NTIA, Treasury, and the FCC, USDA provides detailed information to our federal partners regarding the applications that are received and notifies them in advance of any award being obligated to ensure there is no existing federal award that has been made in the same area.

This past year USDA also took additional steps to increase its coordination with State broadband offices. USDA provided every State broadband office with a listing of every application that was submitted along with a geospatial map of the proposed funded service area and notified State broadband offices at least 30 days in advance of obligating any award in order to give State broadband offices an opportunity to notify the agency if there was any conflict. As a result, two-way coordination with the States is done through USDA's public notice process and its interaction with its federal partners and State broadband offices.

These new steps are in addition to the long-standing environmental clearance process which engages state agencies, and the regulatory proceedings required of our awardees in many states.

Enclosure

Appendix V: Comments from the Department of the Treasury

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

March 17, 2025

Andrew Von Ah
Director, Physical Infrastructure
U.S. Government Accountability Office
441 G Street, NW
Washington, D.C. 20548
Via Email

Mr. Von Ah:

Thank you for the opportunity to review the Government Accountability Office's (GAO) draft report entitled *Broadband Programs: Agencies Need to Further Improve Their Data Quality and Coordination Efforts* (the Draft Report). The Draft Report reviews federal broadband efforts including the agencies' use of broadband availability information and the extent to which agencies' coordination of broadband funding programs aligns with GAO's leading practices for interagency collaboration and contains two recommendations for the Department of the Treasury (Treasury), which Treasury responds to below. Treasury values GAO's analysis and has provided technical comments under separate cover.

In 2021, Congress passed the American Rescue Plan Act (ARPA), which established the Coronavirus State and Local Fiscal Recovery Funds ("SLFRF") program and the Capital Projects Fund ("CPF") to be administered by Treasury. Through these programs, Congress appropriated $350 billion and $10 billion respectively to States, territories, localities, and Tribal governments for eligible uses that include broadband infrastructure. Throughout 2021 and 2022, Treasury fully implemented these programs through its Office of Capital Access, which published extensive guidance on broadband uses[1] and provided support to recipients. As noted in the Draft Report, recipients reported that "Treasury officials' overall expertise has been instrumental in advancing its broadband goals" and "insights that Treasury officials provided helped it identify its priorities and align its initiatives with available funding, and helped it effectively address its unique challenges."

Although not required, Treasury collaborated with other agencies administering broadband funding. Specifically, Treasury entered into the Memorandum of Understanding (MOU) to share information with other agencies regarding broadband derived from their funding programs, established requirements for recipients to report information on their uses of funds that would allow Treasury ARPA-funded projects to be displayed on the Federal Communications

[1] SLFRF Final Rule at 4443, https://www.govinfo.gov/content/pkg/FR-2022-01-27/pdf/2022-00292.pdf; CPF Guidance for States, Territories, or Freely Associated States https://home.treasury.gov/system/files/136/Capital-Projects-Fund-Guidance-States-Territories-and-Freely-Associated-States.pdf; Supplementary Broadband Guidance, https://home.treasury.gov/system/files/136/SLFRF-and-CPF-Supplementary-Broadband-Guidance.pdf).

Commission's (FCC) National Broadband Funding Map (BFM)[2], and have regularly provided the data collected through recipient reporting to the FCC for inclusion in the BFM. Indeed, as of March 5, 2025, the BFM reflects over 1 million locations funded by CPF and SLFRF.

The Draft Report recommends that the Secretary of the Treasury, in collaboration and agreement with FCC, NTIA, and USDA, as appropriate, should (1) clearly define and document the scope of what 'covered data' (as referenced in the agencies' information sharing MOU) includes and (2) clearly define and document timelines for agencies to submit data on funded awards to the Broadband Funding Map, including any changes to awards.

Treasury supports the goal of interagency information-sharing on these issues and, accordingly, will address these recommendations by providing FCC, NTIA, and USDA with copies of the Treasury's relevant guidance for required reporting for CPF and SLFRF recipients. This guidance details: (i) the data that recipients submit regarding SLFRF- and CPF-funded broadband projects,[3] which is what Treasury considers to be "covered data" under the MOU, and (ii) the cadence on which recipients are required to submit it. As reflected in the guidance, SLFRF recipients report on either a quarterly or an annual basis and CPF recipients report on a quarterly basis. Treasury transmits the broadband data that it receives on these established cadences to the FCC for inclusion on the map after it has gone through the appropriate internal reviews and any applicable revision period has passed. Given that Treasury established its reporting requirements years ago, changing either the content or frequency is not reasonable or feasible. In sum, Treasury believes that its existing program guidance is sufficient to address the recommendations.

Since the passage of ARPA, Treasury has worked collaboratively with its agency partners to increase broadband connectivity and to collect and share detailed information about uses of ARPA funds for broadband infrastructure, which can be used to inform other broadband funding projects. Treasury's efforts and achievements are well summarized in the Draft Report. We thank GAO for its work on this engagement and for the opportunity to review and respond to the report and recommendations.

Sincerely,

Gregory Till
Acting Chief Program Officer
Office of Capital Access

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[2] https://fundingmap.fcc.gov/home

[3] SLFRF-Compliance-and-Reporting-Guidance.pdf (see pg. 44, I.3. Broadband Projects); https://home.treasury.gov/system/files/136/Revised-CPF-State-Guidance.pdf ; https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fhome.treasury.gov%2Fsystem%2Ffiles%2F136%2FCPF1ABroadbandInfrastructureLocationData.xlsx&wdOrigin=BROWSELINK (Broadband Infrastructure Project Location Data Template); https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fhome.treasury.gov%2Fsystem%2Ffiles%2F136%2FCPFSpeedAndPricingTemplate.xlsx&wdOrigin=BROWSELINK (Speed and Pricing Data Template).

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Nalylee Padilla (Assistant Director), Ned Malone (Analyst in Charge), Tammy Beltran, Melanie Diemel, Gina Hoover, Delwen Jones, Gabe Nelson, Krishana Perry, and Mike Soressi made key contributions to this report.

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