



## **ARPA Closeout Policy Addendum**

### **1. Purpose**

This addendum establishes a clear distinction between projects that have completed physical and engineering milestones and those that have finalized all administrative and fiscal requirements (i.e., financial closeout reporting). This distinction is necessary to meet reporting obligations to the U.S. Department of the Treasury regarding the status of ARPA State and Local Fiscal Recovery Fund (SLFRF) and Capital Projects Fund (CPF) grants.

### **2. Category Definition: Projects Substantially Complete with Third-Party Engineer Certification**

A project shall be classified and reported to the U.S. Treasury under this category when it meets all of the following criteria:

- **Substantial Completion Achieved:** According to the Treasury guidance, substantial completion is defined as the date for which the Project can fulfill the primary operations that it was designed to perform, delivering services to end-users.<sup>1</sup> This is satisfied upon third party engineering certification.
- **Engineer Certified:** The subrecipient Internet Service Provider (ISP) has successfully obtained and provided the **Independent Third-Party Engineer Certification of Project Completion**. This includes the signed-and-sealed certification by an Oklahoma-certified professional engineer in good standing, along with the required "As-Built" maps, performance/speed test results, and documented service offerings.
- **Awaiting Financial Closeout:** The project has **not** been financially closed out with the Oklahoma Broadband Office (OBO). This means the OBO is still holding the required 10% retainage of the total grant award, and final financial reconciliation, internal technical/site validation, or U.S. Treasury final approval is still pending.

### **3. Reporting and Financial Status Matrix**

To clarify the operational workflow for these projects prior to final closure, the following matrix outlines their status:

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<sup>1</sup> Coronavirus Capital Projects Fund U.S. Department of the Treasury.  
<https://home.treasury.gov/system/files/136/Allocations-Methodology-States-Territories-Freely-Associated-States.pdf>



<b>Project Milestone Status</b>	<b>Engineering Status</b>	<b>OBO Financial Status</b>	<b>U.S. Treasury Reporting Classification</b>
<b>Substantially Complete</b>	<b>Certified</b> by an Independent Third-Party Oklahoma PE	<b>10% Retainage Withheld</b> ; final expenditure review or Treasury approval pending	<b>"Projects substantially complete with third party engineer certification"</b>

#### **4. Obligations and Retainage**

Projects designated under this category remain subject to all internal OBO validation controls. The 10% retainage will continue to be withheld by the OBO and will not be disbursed to the ISP until:

1. The OBO completes its internal fiscal and technical reviews (including GIS mapping validation and physical site visits, if triggered).
2. A formal Project Closeout Meeting is conducted with OBO leadership.
3. The U.S. Treasury officially reviews and approves the submitted closeout documentation during the quarterly reporting cycle.