

# Capital Projects Fund 2025 Annual Performance Report



State of Oklahoma  
2025 Performance Report

## Executive Summary

The Oklahoma Broadband Office (OBO) is using \$167,683,747 from the Capital Projects Fund (CPF) to address a significant digital divide that disproportionately affects Oklahoma's rural and low-income areas. The Oklahoma Broadband Governing Board determined that buildout of broadband infrastructure would be the best way to address the need for individuals to work and learn from home, access online health care, and support the continued post-COVID economic development in Oklahoma. The State is using CPF funding for the following: (1) Oklahoma Broadband Infrastructure Grant Program (OBIG) - \$159,299,559.65; and (2) OBO Recipient Admin - \$8,384,187.35. These dollar figures were approved by Treasury and calculated using the Treasury's guidance which allows for 5% of the award to be utilized for administrative purposes. Over the previous 12 months, the state has awarded grants to Internet service providers, and those companies have begun construction to serve over 26,000 homes and businesses. The Treasury approved OBIG CPF application documents and related resources are available here: <https://oklahoma.gov/broadband/grant- programs/capital- projects-fund.html>.

## Program Information

<b>Program Plan Number</b>	<b>Program Start Date</b>	<b>Program End Date</b>	<b>CPF Funds Per Grant</b>
<u>CPF - 5</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$2,150,563.75</u>
<u>CPF - 6</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$1,491,550.00</u>
<u>CPF - 9</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$3,590,546.97</u>
<u>CPF - 13</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$1,972,539.02</u>
<u>CPF - 21</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$766,924.88</u>
<u>CPF - 22</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$1,911,723.11</u>
<u>CPF - 27</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$3,262,874.58</u>
<u>CPF - 28</u>	<u>2/10/2025</u>	<u>1/8/2026</u>	<u>\$1,935,193.97</u>
<u>CPF - 30</u>	<u>1/22/2025</u>	<u>10/2/2026</u>	<u>\$1,288,022.97</u>
<u>CPF - 115</u>	<u>3/1/2025</u>	<u>9/1/2026</u>	<u>\$11,437,535.44</u>
<u>CPF - 124</u>	<u>3/1/2025</u>	<u>9/1/2026</u>	<u>\$18,346,434.63</u>
<u>CPF - 82</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$19,086,530.40</u>
<u>CPF - 84</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$2,392,249.24</u>
<u>CPF - 85</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$460,169.89</u>
<u>CPF - 88</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$3,312,377.54</u>
<u>CPF - 92</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$13,440,337.55</u>
<u>CPF - 94</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$7,378,800.01</u>
<u>CPF - 96</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$6,656,205.91</u>
<u>CPF - 97</u>	<u>2/7/2025</u>	<u>10/2/2026</u>	<u>\$1,714,988.58</u>
<u>CPF - 67</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$234,309.72</u>
<u>CPF - 74</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$3,400,204.97</u>
<u>CPF - 86</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$315,940.36</u>

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<u>CPF - 91</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$455,449.90</u>
<u>CPF - 102</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$5,326,367.54</u>
<u>CPF - 106</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$4,862,073.99</u>
<u>CPF - 113</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$4,328,386.25</u>
<u>CPF - 121</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$226,611.50</u>
<u>CPF - 123</u>	<u>3/1/2025</u>	<u>8/31/2026</u>	<u>\$73,619.25</u>
<u>CPF - 37</u>	<u>2/7/2025</u>	<u>6/27/2026</u>	<u>\$756,128.50</u>
<u>CPF - 35</u>	<u>2/7/2025</u>	<u>7/27/2026</u>	<u>\$1,243,112.92</u>
<u>CPF - 83</u>	<u>12/23/2024</u>	<u>4/30/2025</u>	<u>\$331,906.95</u>
<u>CPF - 103</u>	<u>12/23/2024</u>	<u>4/30/2025</u>	<u>\$326,459.25</u>
<u>CPF - 16</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$1,312,577.19</u>
<u>CPF - 17</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$1,124,137.50</u>
<u>CPF - 18</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$1,211,865.14</u>
<u>CPF - 19</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$1,353,456.20</u>
<u>CPF - 20</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$2,063,047.56</u>
<u>CPF - 31</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$2,527,923.64</u>
<u>CPF - 34</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$2,188,770.66</u>
<u>CPF - 41</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$1,461,367.30</u>
<u>CPF - 52</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$1,114,327.69</u>
<u>CPF - 72</u>	<u>3/1/2025</u>	<u>10/1/2026</u>	<u>\$2,203,330.89</u>
<u>CPF - 33</u>	<u>2/1/2025</u>	<u>5/31/2026</u>	<u>\$1,596,794.72</u>
<u>CPF - 89</u>	<u>2/1/2025</u>	<u>5/31/2026</u>	<u>\$3,415,306.14</u>
<u>CPF - 66</u>	<u>2/3/2025</u>	<u>12/23/2025</u>	<u>\$1,909,303.68</u>

### Uses of Funds

The OBO's intended use of funds is to administer a statewide last-mile broadband infrastructure expansion program.

The program objective is to provide internet service to areas that displayed a critical need for broadband infrastructure as a result of Covid-19. The funds were awarded to projects displaying an identified need, including those promoting work and learning from home, access to online healthcare, and support for Oklahoma's economic development.

Efforts during this reporting period have focused on monitoring financial and construction mobility of awarded companies. The OBO has 45 CPF projects underway across the state. Each project status is within one of five phases:

- Phase 1: Engineering Started
- Phase 2: Engineering Complete; Buildout Upcoming
- Phase 3: Buildout Started

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- Phase 4: Buildout Complete; Closeout Started
- Phase 5: Closeout complete

Through this reporting period no project has completed its closeout process (Phase 5).

OBO maintains a public-facing broadband dashboard that tracks all ARPA projects, including State and Local Fiscal Recovery Fund and Capital Projects Fund. The dashboard is updated every two weeks.

The dashboard can be accessed here:

<https://okbroadband.maps.arcgis.com/apps/dashboards/37867c333ad54974ab084cc5692e7ee1>

The OBO has weekly meetings with each awarded ISP for ongoing monitoring and compliance. The OBO continues to work with ISPs to document performance requirements, inputs and outputs, and other data that highlights key milestones accomplished for each CPF project. This information will be submitted to Treasury through subsequent Project and Expenditure Reports during the relevant reporting periods.

Activities conducted during the reporting period include:

- Updating the Oklahoma Broadband Map with the most recent FFC availability data to ensure a current representation of unserved and underserved locations in support of potential CPF grant subrecipients.
- Reporting quarterly to the US Treasury.
- Posting CPF awarded locations on OBO's website.
- Updating the OBO Broadband Dashboard to reflect the latest phase type for each project.

Program Plan Number	Project Status
CPF - 5	Phase 2: Engineering Complete/ Building Starting Soon
CPF - 6	Phase 2: Engineering Complete/ Building Starting Soon
CPF - 9	Phase 2: Engineering Complete/ Building Starting Soon
CPF – 13	Phase 2: Engineering Complete/ Building Starting Soon
CPF - 21	Phase 2: Engineering Complete/ Building Starting Soon
CPF - 22	Phase 2: Engineering Complete/ Building Starting Soon
CPF - 27	Phase 3: Building Started
CPF – 28	Phase 3: Building Started

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CPF - 30	Phase 1: Engineering Started
CPF - 115	Phase 1: Engineering Started
CPF - 124	Phase 1: Engineering Started
CPF - 82	Phase 1: Engineering Started
CPF - 84	Phase 3: Building Started
CPF - 85	Phase 1: Engineering Started
CPF - 88	Phase 3: Building Started
CPF - 92	Phase 1: Engineering Started
CPF - 94	Phase 1: Engineering Started
CPF - 96	Phase 1: Engineering Started
CPF - 97	Phase 3: Building Started
CPF - 67	Phase 1: Engineering Started
CPF - 74	Phase 1: Engineering Started
CPF - 86	Phase 1: Engineering Started
CPF - 91	Phase 1: Engineering Started
CPF - 102	Phase 1: Engineering Started
CPF - 106	Phase 1: Engineering Started
CPF - 113	Phase 1: Engineering Started
CPF - 121	Phase 1: Engineering Started
CPF - 123	Phase 1: Engineering Started
CPF - 37	Phase 1: Engineering Started
CPF - 35	Phase 1: Engineering Started
CPF - 83	Phase 4: Building Complete/ Closeout Started
CPF - 103	Phase 4: Building Complete/ Closeout Started
CPF - 16	Phase 1: Engineering Started
CPF - 17	Phase 1: Engineering Started
CPF - 18	Phase 1: Engineering Started
CPF - 19	Phase 1: Engineering Started
CPF - 20	Phase 1: Engineering Started
CPF - 31	Phase 1: Engineering Started
CPF - 34	Phase 1: Engineering Started
CPF - 41	Phase 1: Engineering Started
CPF - 52	Phase 1: Engineering Started
CPF - 72	Phase 1: Engineering Started
CPF - 33	Phase 1: Engineering Started
CPF - 89	Phase 1: Engineering Started
CPF - 66	Phase 1: Engineering Started

### Promoting Equitable Outcomes and Addressing Critical Needs

The OBO is funding areas lacking reliable access to reliable highspeed internet with a requirement of meeting symmetrical upload and download speeds of 100 Mbps. In addition, the OBO implemented affordability measures and considered adoption assistance in project selection. In establishing the program rules, the OBO followed the US Department of Treasury's program requirements along with 2 CFR 200 subrecipient selection and grants management requirements. Additionally, proposed investments owned, operated, or affiliated with local governments, non-profits, or tribes were encouraged in order to meet the needs of the community effectively.

The OBO published a layered map containing demographic and economic information to identify disadvantaged communities in the priority areas who may have critical needs. With regards to scoring of applications, the OBO created certain pass/fail criteria necessary for a project to be further considered for scoring. The pass/fail criteria were as follows:

1. Applicant provides fabric ID and addresses of locations currently unserved and underserved in the project service area.
2. Applicant provides evidence that communities identified to be served have a critical need for the project as is related to access, affordability, reliability, and/or consistency.
3. Applicant certifies that the project is designed to deliver, upon completion, service that reliably meets or exceeds symmetrical download and upload speeds of 100 Mbps (or 100/20 scalable with documented exceptions).
4. Applicant commits to provide at least one low-cost option (not ACP) providing at least 100/20 Mbps or greater sufficient for households with multiple users to simultaneously telework and engage in remote learning.
5. Applicant certifies participation in FCC's Affordable Connectivity Program committed to participating in the FCC Affordable Connectivity Program.
6. Applicant certifies that it shall comply, as applicable, with all federal labor and construction standard requirements as required by the Department of Treasury.
7. Applicant must complete project no later than 12/31/2026.
8. Applicant submits all other applicable documentation.

Following the pass/fail criteria applications were eligible to score up to 100 points in seven broad categories:

1. Number of Broadband Connections & Speeds – Up to 25 points
2. Matching Fund Amount – Up to 20 points
3. Project Readiness – Up to 15 Points
4. Project Sustainability – Up to 15 points
5. Community Support or Engagement – Up to 10 points

6. Economic Development and Community Impact – Up to 10 points
7. Broadband Adoption Assistance – Up to 5 points

The first category, “Number of Broadband Connections and Speeds,” evaluated the applications proposed improvements in broadband speed and number of connections to be served by the project. Speeds were evaluated based on anticipated broadband speed/scalability improvements from pre-existing broadband service levels to proposed service levels. The number of broadband connections were evaluated based on the number of total locations potentially served, broken down by the type of location (i.e., households, businesses, and community anchor institutions). Points were awarded for the eligible underserved and unserved locations.

The second category, “Matching Fund Amount,” was scored based on the percentage of the total eligible project cost that is being matched by the applicant. Applicants matching funds that exceed the minimum 25% match of eligible project costs resulted in a higher score. Any funding partner contributions were included in applicant matching funds for points. Preference was given to applicants who have financial commitments from qualified community partners (e.g., county, city, town, tribal entity, etc.).

The third category, “Project Readiness”, was evaluated on the applicant’s demonstration of their organizational capacity to initiate, construct, and launch the project. An applicant had to demonstrate how their project is “shovel-ready” and how quickly the applicant can begin construction following the grant award. Full points were awarded to applicants who have concretely demonstrated a comprehensive knowledge for – and detailed preparation for – the proposed project. Detailed preparation included providing the complete project schedule and financial requirements, including but not limited to, all budget materials in a detailed manner, with sources and uses of funds being realistic and eligible, all funding partners secured, documentation of project design and plans including scalable equipment, and all preconstruction requirements (e.g., construction permits, rights-of-way, etc.) identified and included in the detailed project timeline and schedule. Project implementation included the projects proposed speed tiers and service pricing, five-year service commitment, and proposed marketing strategies. The third category, “Project Sustainability,” was evaluated on the applicant’s demonstration of their strong internal capacity to effectively support and sustain their broadband infrastructure proposal. An applicant had to demonstrate project sustainability in four main areas: technical expertise, organizational support, financial viability, and future scalability. Technical expertise included prior experience in providing broadband services. Organizational support included how the organization will sustain broadband service delivery and maintenance. Financial viability included the applicants’ most current audited financial statements. Future scalability included how the applicant will scale broadband service delivery beyond the scope of the proposed project.

The fourth category, “Community Support or Engagement,” was evaluated on the applicant’s

demonstration of the proposed projects community support and the critical need the project is addressing. Community support was demonstrated by evidence of how the impacted community has participated and informed the design, implementation, and/or operation of the proposed project. Applications included a letter of support or commitment from the appropriate community, local government, and/or tribal entity. Evidence of the critical need this proposed project is addressing related to broadband access, affordability, and reliability. To be awarded the full points, an applicant was required to provide strong evidence of community support or engagement and strong evidence to explain why it was a critical need and how the proposed project will address the need.

The fifth category, “Economic Development and Community Impact,” was evaluated on the applicant’s demonstration of how this proposed project will impact the economic development and community enhancement of the service area. Evidence that the proposed project area will serve the economically distressed was shown by unemployment, poverty, or population decline based on most recent data from the Qualified Census Tracts, CDC’s Social Vulnerability Index, ACP eligibility data, etc. Applicants were required to identify the number of households, businesses, farms, agricultural-use customers, and other significant community anchor institutions and educational facilities in the proposed project area which may benefit from the improved broadband service. For businesses and community anchor intuitions customers, applicants were required to identify how improved broadband speeds and coverage will benefit the economic development of the proposed area.

The sixth and final category, “Broadband Adoption Assistance and Project Completion,” was evaluated on demonstration of the necessary broadband adoption strategies that are in place and/or will be used to assist in the success of the overall proposed project along with affirmation that the project will be completed prior to December 31, 2026. Broadband adoption activities included providing prospective customers with digital literacy training and/or technical support required to successfully adopt and utilize broadband service. Project completion was evaluated on the applicant’s demonstration in their application that they have the organizational capacity to initiate, construct, and launch the project. Evidence to be considered in determining this comprehensive knowledge and preparation included detailed budget materials that outline the funding for the project including a detailed funding schedule, and preconstruction documentation (e.g., construction permits, rights-of-way, etc.) including certified engineering design and diagrams. Any application that did not successfully demonstrate the project can be completed prior to December 31, 2026, did not move forward. On either a monthly or quarterly basis, depending on risk level, all subrecipients are required to submit reporting in alignment with Treasury requirements, including but not limited to locations served, expenditure reports, and additional financial and programmatic reporting as determined by the OBO with Treasury’s guidance. Subrecipients are required to submit an annual performance report to the OBO detailing their accomplishments, speeds, subscriber data, and other required information. This information will be used to ensure project



completion within the Treasury's guidelines and will be included in future Treasury reporting.

### Labor

Applicants were required to describe their workforce development considerations, including the use of project labor agreements, and indicate whether the project plan will either directly employ the workforce to ensure high labor standards or if it will have policies and procedures in place to ensure contractors and subcontractors meet high labor standards. All Recipients (including subawardees) of federal funds were required to complete financial, performance, and compliance reporting as required by the Grant Agreement, 2 CFR § 200.328, 2 CFR § 200.329, and as outlined in the Coronavirus Capital Projects Fund Compliance and Reporting Guidance.<sup>17</sup> Recipients were required to maintain accounting records for compiling and reporting accurate financial data in accordance with appropriate accounting standards and principles. The OBO requires the subawardees to track, monitor, and detail specific project information throughout the duration of the project. In further compliance with the Treasury, the OBO requires quarterly programmatic and expenditure reports for each project.

### Community Engagement

With the guidance of the Oklahoma Broadband Governing Board and the industry perspective from the Oklahoma Broadband Expansion Council, the OBO is well positioned with stakeholder involvement. Meetings of the Governing Board and Expansion Council were open to the public and included discussion on broadband related topics including the CPF grant program. With its stakeholders, the OBO is able to reach ISPs, economic development organizations, non-profits, and local and Tribal government officials. In addition, the OBO have continued its partnerships with County Extension Agents and the State Regents for Higher Education, among others.

In addition to the above efforts by the OBO, each OBIG applicant was required to submit evidence of community support and engagement with its submission. The OBIG scoring criteria allocated up to 5 points for community support and engagement. Applicants received 0 points for limited (minimum) evidence of three community support letters, 2.5 points for sufficient evidence of three community support letters and one community support meeting, and 5 points for submission of strong evidence consisting of five letters of community support and three community support meetings. Community support letters typically came from state and local government officials, community groups, and anchor institutions within the project area. For projects to be conducted on Tribal lands applicants were required to submit evidence of consultation with Tribal officials.

The state will also conduct a speed test to validate identified broadband access gaps and provide a benchmark which will be used to evaluate the program's end results.