

STATE REVOLVING FUND
ADVOCACY



TOOLKIT



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Acknowledgements

This toolkit was developed with generous support from the Pisces Foundation and in partnership with the Clean Water for All Coalition. The content of this toolkit was informed by the insightful perspectives and expertise of many collaborators, including an exceptional Advisory Committee of state and local advocates and several technical reviewers with expertise in SRF implementation. River Network and Clean Water for All extend our deep gratitude to the following individuals for providing their time and energy to make this toolkit useful, accurate, and as meaningful as possible:

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SRF State Advocates Forum

Sections of this toolkit build on the collective expertise and content created by the SRF State Advocates Forum, a partnership between the Alliance for the Great Lakes, Environmental Policy Innovation Center, PolicyLink, and River Network. The purpose of the Forum is to connect advocates working on equitable SRF implementation and provide a space for peer learning and collaboration. [Complete this form](#) to learn more about the Forum and sign up to join our listserv and calls.

Who Should Use This Toolkit

This toolkit was developed to support state and local advocates interested in water infrastructure investment who are seeking to better understand the State Revolving Fund (SRF) process. Nonprofit and community-based water advocates have an opportunity to influence how new and recurring federal water infrastructure funds are distributed and to reform how SRF programs operate. This toolkit aims to build the capacity of advocates to influence, improve, and access the process of securing funding for communities who need it most and have historically not been able to access SRF dollars. The toolkit strives to be accessible to newcomers to this issue, providing background information on how SRFs work and actionable ideas for how to participate in SRF processes and advocacy. Whether you are working with your local utility, interacting with state agency employees, US Environmental Protection Agency (EPA) regional offices, your legislators, or some combination of these primary actors, this toolkit is meant to prepare you to understand:

- How SRF dollars are administered from the federal level down to the state and municipal levels,
- The basic functions of the SRF program and what kinds of projects are eligible under both the [Clean Water](#) and [Drinking Water SRFs](#), including changes from the [Bipartisan Infrastructure Law](#),
- The key process points, such as the development and release of the state [Intended Use Plan](#), and ways to engage in targeted advocacy around these points,
- Opportunities to improve the SRF program to better serve disadvantaged communities, especially small, low-wealth and communities of color, who have historically lacked access to SRF funding, and
- Where to find additional support via [technical assistance](#) and other resources.

How to Use This Toolkit

This toolkit can be used by both novice and more experienced advocates working on water infrastructure; some sections may be more relevant to you than others. For a comprehensive overview of the history and function of the SRFs, including opportunities to influence implementation and supporting tools and resources, you can download a full PDF version of the toolkit. In the PDF version, the entire toolkit is presented in one document, while the [online version](#) allows you to easily jump to whichever section(s) are relevant to you.



Text in **orange** boxes include **key term definitions**. These terms can also be found in our comprehensive [Glossary](#).



Each section contains **additional resources** for learning more about a specific topic. These resources have also been compiled in the [References](#) section. Case studies, advocacy examples, and recommendations for action are included throughout each section.



The **“Tools and Strategies”** section includes a compilation of talking points, contact information, sample letters, example comments, shareable downloadable graphics, and other advocacy strategies for you to use.



Need additional support?

Contact us by emailing infrastructure@rivernetwork.org and River Network staff will be happy to help you navigate the Toolkit and find supplemental information.



The Opportunity: Using Federal Funding to Address Critical Water Infrastructure Needs with the Bipartisan Infrastructure Law (BIL)

The passage of the Bipartisan Infrastructure Law (BIL) creates a historic moment for addressing water infrastructure challenges across the US.

For the past several decades, federal investment in water infrastructure has waned. With this decline in investment, many communities across the United States have struggled to properly maintain their water infrastructure—a critical resource for ensuring safe and affordable drinking water, wastewater, and stormwater services.

The cost of water for households has risen continuously throughout the US as local utilities try to make up for the loss in funding while maintaining their water systems' aging infrastructure. For the past two decades, [water and wastewater service bills have grown much faster than other household expenses](#), making water unaffordable for many. Additionally, issues of lead contamination and other harmful chemicals contaminating water supplies are most often addressed through investment in water infrastructure—such as lead service line replacement or enhanced water treatment technologies to address [emerging contaminants](#). These issues most often disproportionately impact small and low-wealth communities, as well as predominantly Black, Indigenous, Latinx, and other communities of color. Investment in water infrastructure is necessary for water equity—ensuring all have access to safe, affordable and resilient water and wastewater services.

The Clean Water and Drinking Water State Revolving Funds (CWSRF and DWSRFs) represent the largest source of federal funding for water infrastructure. These funds are intended to support communities across the country by increasing their financial capacity to take on large water infrastructure projects, addressing everything from outdated and leaking pipes to increasing the storage capacity of their water treatment plants to ensure continuous delivery of safe and clean water to their residents.

This toolkit focuses solely on the SRFs and does not explore other available water infrastructure funding options. A municipality, wastewater system, or other entity may use other funding options instead of or in addition to the SRFs depending on their population size, project type, and/or financial capacity. To learn more about additional infrastructure funding opportunities, please see [River Network's Equitable Water Infrastructure Toolkit](#) as well as the list of programs below.

Here is a non-exhaustive list of other federal programs that can be used for water infrastructure projects:

- [Water Infrastructure Improvements for the Nation Act \(WIIN\) Grant Programs](#) US Environmental Protection Agency
- [Rural Decentralized Water Systems Grant Program](#) US Department of Agriculture
- [Grants for Rural and Native Alaskan Villages](#) US Department of Agriculture
- [Emergency Community Water Assistance Grants](#) US Department of Agriculture
- [Circuit Rider Program – Technical Assistance for Rural Water Systems](#), US Department of Agriculture
- [Water & Wastewater Disposal Grants to Alleviate Health Risks on Tribal Lands and Colonias](#), US Department of Agriculture
- [Water & Wastewater Disposal Loan Guarantees](#), US Department of Agriculture
- [Community Development Block Grant Program](#), US Department of Housing and Urban Development
- [Public Works and Economic Adjustment Assistance Programs](#), US Economic Development Administration

Explore the [Environmental Finance Center Network's Funding Sources](#) by state or territory for more water infrastructure funding options and learn more through the [EPA's Water Finance Clearinghouse](#), which includes program descriptions, application instructions, current funding levels, and contact information for local, state, and federal programs as well as foundation grants.



In practice, however, the communities most in need of investment in their water infrastructure regularly face barriers to accessing these dollars. While the SRFs are meant to support communities nationwide in addressing the most critical issues of water quality and access, the process has remained inaccessible to communities in need due to a range of systemic issues, including burdensome funding and financial capacity requirements for states and municipalities, lengthy and bureaucratic application processes, and a lack of transparency and opportunity for engagement in the process as a whole.

Increasing equitable infrastructure investment means ensuring more SRF dollars flow to communities in need and identifying and addressing current and historic barriers and opportunities to improve access. Social Justice Bonds can support efforts to increase equitable infrastructure investment by focusing on people over assets, including community oversight and evaluation, considering anti-displacement measures, and repairing historical discrimination embedded within municipal development practices. Learn more from [Activest](#) about this approach and [see Section 04](#) from their report considering questions about water and wastewater infrastructure.

To begin to address some of these issues, Congress passed the Infrastructure Investment and Jobs Act (IIJA), also referred to as the Bipartisan Infrastructure Law (BIL), in November 2021, marking a historic moment for water infrastructure. The BIL allocated roughly \$50 billion dollars for water infrastructure projects from 2022–2026 in addition to normal (base) funding levels for both the CWSRF and DWSRFs—meaning significantly more funding is available to address critical water infrastructure issues. BIL funding also comes with [several provisions to support more equitable outcomes](#)—including requirements to target disadvantaged communities, increasing forgivable loans, and more, detailed in the [Bipartisan Infrastructure Law: Changes to SRF Administration for 2022–2026 section](#). These additional dollars and equity-focused provisions in BIL are a direct result of the hard work of advocates pressing for long-sought improvements to water infrastructure funding over the past several years. These provisions lay the groundwork to increase equitable access to SRF funds and ensure communities most in need can improve their project qualifications and capacity.

However, while the BIL begins to address the historic barriers to entry described above for the most impacted communities, ensuring equitable outcomes of these programs requires strategic advocacy by state and local advocates. This toolkit provides a roadmap for navigating that process and holding decision-makers accountable to improving the SRF process toward more equitable, community-based outcomes.

What Is Equitable Water Infrastructure Investment?

Equity in water infrastructure investment addresses the historic harm and disinvestment in communities facing some of the biggest water challenges, including water affordability and water safety. To achieve equitable infrastructure investment, work must be done to acknowledge historic injustice and bring corrective justice to communities that have suffered neglect, disinvestment, and other systemic inequities as a result of policy design.

EQUITABLE WATER INFRASTRUCTURE INVESTMENTS ARE:

+ Directed by the community toward public health and clean, safe, affordable, and accessible water

+ Supportive of the quality and ecological integrity of our streams, rivers, lakes, and other waterways



+ Distributed intentionally to support low-income and communities of color most at-risk from environmental harms and historic lack of investment

+ Enhance the long-term and technical and fiscal health of water systems, utilities, and wastewater systems

This graphic originally appeared in the River Network report [Building Blocks of Trust: Creating Authentic and Equitable Relationships between Community Organizations and Water Utilities](#)

What Does Advocacy Look Like in This Space?

While opportunities to advocate for water equity go beyond the SRFs, this toolkit focuses on how to influence the system of SRF administration toward equity. Advocacy recommendations throughout each section of the toolkit describe opportunities to make improvements to the SRF process in order to increase access to this funding by communities with the greatest need. Advocacy strategies discussed in this guide include, but are not limited to:

- Identifying specific areas for improvement toward equity, including revising [disadvantaged communities \(DAC\) definitions](#), improving state formulas for principal loan forgiveness, and other statewide changes that will increase the amount available to and manageable by impacted communities.
- Engaging in public comment periods for your state's Intended Use Plan—where funded projects are identified by each state's [SRF program administrator](#).
- Proactive relationship building and communication with your state's SRF administrator, local water utility, or Regional EPA SRF Program representative regarding your community's water infrastructure needs and concerns.
- Addressing community-based economic opportunities such as workforce and contractor training and development through infrastructure projects and community engagement initiatives.

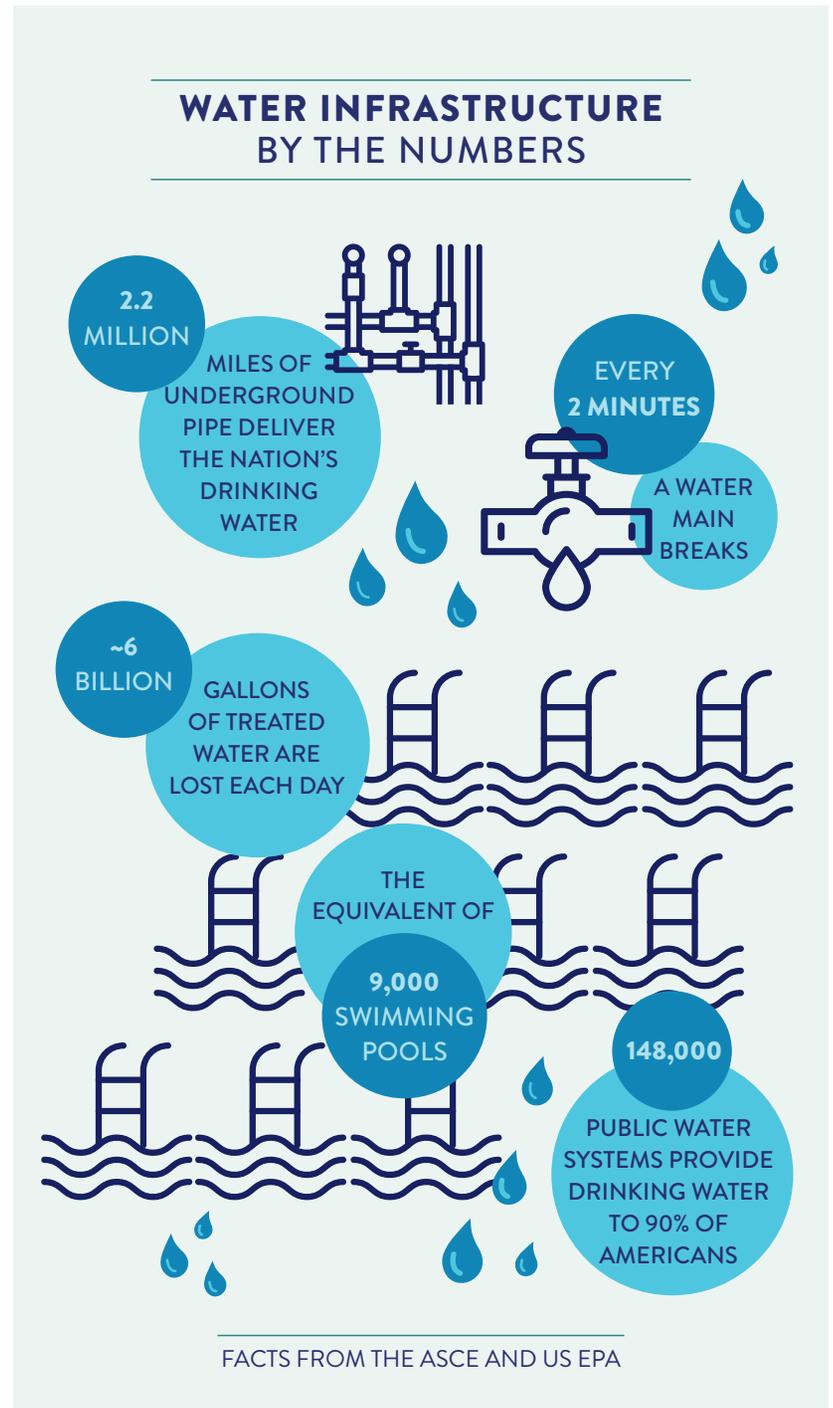


Introduction: Historical Context & America's Water Infrastructure Challenges

Inequitable & Inadequate Water Infrastructure Investment

Water infrastructure like pipes, tanks, and pumps are often out of sight and out of mind. This hidden infrastructure is meant to deliver safe drinking water to our homes and businesses and take away wastewater for treatment. It funnels stormwater out of streets and helps reduce the risks of flooding and intense storms. However, decades of underinvestment have led the country to an increasingly critical situation. According to the [American Society of Civil Engineers](#) (ASCE), the federal government's share of total capital spending in the water sector decreased from 63% in 1977 to just 9% in 2017. As a result, the burden of maintaining systems shifted towards communities, leading to rising water and sewer rates for customers, causing affordability problems as utilities struggle to upgrade and replace failing infrastructure. An ASCE [economic study](#) in 2020 found that without investment in drinking water and wastewater infrastructure, the *annual* investment gap will grow to \$434 billion by 2029. In November 2021, Congress passed the [Bipartisan Infrastructure Law](#) (BIL) to help address this growing need. **While the BIL provides a significant step in the right direction by allocating over \$50 billion for water and wastewater infrastructure projects over five years (2022-2026), more still needs to be done to ensure sustained investment over time.**

Between 2022 and 2026, Clean Water and Drinking Water State Revolving Funds will provide states, tribes, and territories with increased levels of funding to tackle pressing infrastructure needs. Historically, larger drinking water systems serving majority-white populations have been more successful in their bids for SRF funding. Small communities and communities with larger proportions of people of color have been [less likely to receive assistance](#) when they [do apply](#), and oftentimes do not apply for SRF funds due to both financial and non-financial capacity and process constraints. The [legacy of redlining](#), racial segregation, and discriminatory lending practices are evident today in the maintenance needs of water infrastructure in low-wealth communities that struggle to adequately finance projects and secure needed technical expertise. Aging infrastructure increases a community's likelihood of experiencing lower water quality, less efficient systems, and threats ranging from contamination to exacerbated flooding or water scarcity. It is past time to achieve equitable water infrastructure investment. In an effort to make funds more accessible to overburdened communities, 49% of the funding through BIL will be provided as grants and forgivable loans to disadvantaged communities (DACs). This Congressional directive to give about half of the funding as [additional subsidization](#) is a notable departure for a program that has primarily functioned as a low-interest loan program.



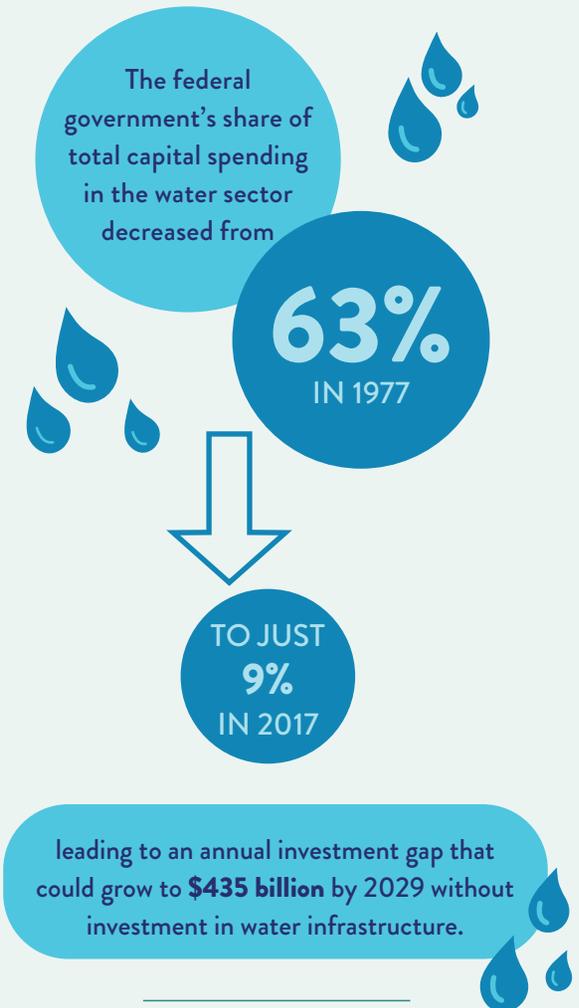


An Overview of SRFs

The Creation of Clean Water & Drinking Water SRFs

Both the Clean Water SRF (CWSRF) and Drinking Water SRF (DWSRF) were established as part of larger federal water quality and protection policies beginning in the 1980s. The CWSRF was established in 1987 as an amendment to the Clean Water Act (CWA). This program replaced the [EPA's Construction Grants Program](#), established in 1972 under the CWA, which delivered grants directly to municipalities for much of our nation's current water infrastructure, including [sewage treatment, pumping stations, and more](#). The creation of the CWSRF shifted this program to a revolving loan program for water infrastructure, administered by states, territories, and tribes and focused on surface water quality and CWA compliance.

The creation of the DWSRF followed in 1996 as an amendment to the [Safe Drinking Water Act \(SDWA\)](#) and provides a revolving loan program for states, territories, and tribes to focus funding water infrastructure projects aimed at drinking water quality and delivery as well as compliance with the SDWA. Congress appropriates money each year to both the DWSRF and CWSRF, however the need for investment in water infrastructure nationwide far outweighs the funding that is available. Additionally, the transition from a grant to loan program, and requirements for state matches in federal funds, have increased state and local financial capacity requirements, placing additional burdens on paying for infrastructure investments on the communities in need.



FACTS FROM THE ASCE

The SRF Process: Funding & Administration

Funding for SRF programs is appropriated by Congress annually to the EPA which distributes [capitalization grants](#) to states and territories and their SRF-administering agencies—typically state environmental agencies. In some states, the DWSRF program is operated by a health agency, and some states operate their SRFs as a partnership between a financial agency and an environmental or health agency. For example, in Oregon, the DWSRF is a partnership program between Business Oregon and the Oregon Health Authority, while the state’s CWSRF is operated by the Oregon Department of Environmental Quality. Some states use interagency [funding committees](#) to review applications. To find out which agencies administer SRF programs in your state, [go to this page](#).

Each state and territory receives a specific amount of funding determined by US EPA’s allotment formulas for both the CWSRF and DWSRF. However, these formulas do not necessarily reflect an accurate assessment of need and advocates have been pushing changes that ensure funding is more appropriately disbursed. For more details on the disbursement of CWSRF and DWSRF dollars, see the [Appendix, Table 1](#).

STATE REVOLVING FUND PARTNERSHIP

The State Revolving Fund (SRF) program is administered by three partner agencies. Colorado statute directs the Colorado Department of Public Health and Environment, Water Quality Control Division; the Colorado Water Resources and Power Development Authority; and the Colorado Department of Local Affairs, Division of Local Government (DLG) to jointly operate the program. These agencies administer the program with common goals approved and supported by the Water Quality Control Commission and the authority board of directors.

Agency responsibilities		
Division	Authority	DLG
<ul style="list-style-type: none"> Primacy agency. Program administration. Technical review and advisory role. Manages fund set-asides. Federal reporting. 	<ul style="list-style-type: none"> Financial structure. Manages budgets and investments. Disburses funds. Federal and state reporting. Provides a state match. Loan portfolio monitoring. 	<ul style="list-style-type: none"> Conducts financial capacity assessments. Financial and managerial assistance to systems. Coordinates funding collaboration. Program outreach.

In Colorado, the DWSRF is administered by three partner agencies with divided responsibilities, which is a more complex SRF arrangement than most. Source: CO DWSRF [IUP from FY 2022](#).

SRF programs provide low interest loans that are at or below market rate to eligible recipients—these loans are repaid over time, with repayments going back into a “revolving” fund that can then be used for future projects. Repayment may not exceed 30 years. Historically, states have been required to provide a 20% match using non-federal funds. This means states must identify additional money—at least 20% of their annual federal capitalization grant—from other sources within their state.¹

¹ However, the general supplemental funding from the Bipartisan Infrastructure Law (BIL) temporarily reduces this requirement to just 10% for the fiscal years 2022 and 2023 (base funds continue to require a 20% match).



Authorization: [Congressional authorization](#)

establishes or continues the authority for agencies to conduct programs or activities.

Appropriation: Funding is made available to federal programs and activities through an appropriations act, which details the specific funding level for each federal agency and its programs. Sometimes Congress enacts supplemental appropriations acts. It’s possible for some laws, like the [Bipartisan Infrastructure Law](#), to both authorize *and* appropriate funds for programs.

Capitalization Grants: Federal grants awarded by EPA to a state, tribe, or territory to cover part of their revolving funds. These grants “[establish permanent financing institutions in each state to provide continuing sources of financing](#)” for water infrastructure projects.

Over the last decade **95.8% of total CWSRF assistance was provided as loans** and just **4.2% as additional subsidization**.



Within the **4%** that was **additional subsidy**, **3.6%** came in the form of **principal forgiveness** and just **0.6%** as **grants**.

Source: A Fairer Funding Stream: How Reforming the Clean Water State Revolving Fund Can Equitably Improve Water Infrastructure Across the Country. *Natural Resources Defense Council and Environmental Policy Innovation Center* (2022).

States disburse SRF assistance to [eligible entities](#) such as community water systems and wastewater utilities. Assistance can take the form of loans and [additional subsidization](#). The vast majority of SRF funding comes in the form of loans rather than additional subsidization, though advocacy efforts are changing that calculus, as can be seen in the BIL funding, which designated 49% of all general supplemental funding as additional subsidization. For general base funding, permanent minimum additional subsidization requirements were also established through BIL, amending the Clean Water Act and the Safe Drinking Water Act. These amendments established a requirement for states to use at least 10% (and no more than 30%) of their capitalization grant for additional subsidization through the CWSRF and 13% (and no more than 35%) of their capitalization grant for additional subsidization through the DWSRF.

Tribes access SRF funding through a slightly different approach, which is described in more detail in the Tribal Set-Aside Programs section. Tribal organizations receive SRF dollars based on location, the Drinking Water Infrastructure Needs Survey, and Indian Health Service [Sanitation Deficiency](#)

[System](#) data. EPA Regions, rather than states, allocate and approve grants to tribes.



Tribal Set-Aside Programs

EPA Region 2 and Region 9 offices manage SRF programs for [US territories](#), including American Samoa, Guam, the Northern Mariana Islands, and the U.S. Virgin Islands. Funds are allocated by a formula that primarily considers infrastructure needs of water systems identified through national needs surveys, along with population size, geographical area, and the number of water systems. The territories, as well as Washington, D.C., [distribute funds to SRF recipients only as grants rather than loans](#), unlike the states and Puerto Rico.

The following graphic provides a high-level overview of the different roles involved in SRF authorization, regulation, and distribution, and a few ways advocates can get involved. Advocacy examples are included throughout the toolkit, and you can find contact information for EPA and state SRF program staff in the [Tools and Strategies section](#).

SRF IMPLEMENTATION: KEY ROLES

CONGRESS

- + Appropriates funding each year to Drinking Water and Clean Water SRFs.
- + Can change SRF eligibilities and authorize new programs.

EPA

- + Reviews & approves states' Intended Use Plans (IUPs).
- + Disburses SRF money to states, territories, and tribes according to allocation formulas.
- + Regional offices review states' financial performance.

STATE LEGISLATURE

- + May define "Disadvantaged Communities" in state statute.
- + May pass laws related to SRF planning processes.

STATE AGENCIES *(may include environmental, health, and financing agencies)*

- + Develops criteria to rank projects, including affordability criteria for CWSRF and defining Disadvantaged Communities for DWSRF.
- + Submits Intended Use Plan to EPA.
- + Develops project priority list (PPL).
- + Receives & reviews project applications from communities.
- + Disburses funds after selecting projects.
- + Receives loan repayment from communities/water and wastewater systems.

FEDERAL

LOCAL

STATE

ADVOCATES

LOCAL GOVERNMENTS/WATER AND WASTEWATER SYSTEMS

- + Submits project applications to the state.
- + Carries out water infrastructure projects.
- + Creates procurement and hiring processes for project completion.
- + Repays loans via ratepayer fees.

POINTS OF ENGAGEMENT

- + **Federal:** Communicate with EPA regional and headquarter staff about your state's SRF process & improvements you want to see.
- + **State:** Contact state SRF managers to learn about public participation opportunities before they develop IUPs. Submit public comments & maintain ongoing working relationship with SRF staff.
- + **Local:** Learn about your utility's asset management plan, and convey your thoughts on project priorities. Urge them to consider funding opportunities. Educate residents about water quality and affordability issues.



Additional subsidization: Awards with better ("additional") financing terms that do not need to be repaid. Additional subsidization comes in three forms:

- 1) **Grants** – An award of financial assistance that does not have to be repaid.²
- 2) **Principal Forgiveness (PF)** – Assists applicants to reduce the size of an SRF loan by forgiving a portion of the loan. While PF works similarly to a grant, it does not follow federal grant reporting requirements, therefore reducing administrative costs. States develop criteria to determine which projects qualify for principal forgiveness.
- 3) **Negative Interest Loans** – A negative interest rate reduces the total repayment amount—this is uncommonly used by states.

Drinking Water Infrastructure Needs

Survey and Assessment: The EPA conducts this survey once every four years in collaboration with states, territories, and community and noncommunity water systems to project drinking water system needs for the next 20 years. The results of the assessment are reported to Congress and are the basis for determining how much DWSRF money is distributed to states, tribes, and territories.

< Find this graphic in the [tools section](#) to download or share!



² Less than 10% of additional subsidization is distributed as grants. Principal forgiveness of loans is [far more common](#).

The SRF Process: Eligibility & Implementation

The DWSRF and CWSRF provide funding to a range of eligible entities that both support and implement improvements to their community's water infrastructure. The [DWSRF](#) provides financial assistance to both privately and publicly owned community water systems and nonprofit, non-community water systems such as schools and publicly owned campgrounds. The [CWSRF](#) provides financial assistance to municipalities, inter-municipal, interstate, state agencies, nonprofit entities, private, for-profit entities, watershed groups, community groups, homeowner's associations, and individuals for construction of publicly owned treatment works, wastewater, stormwater and groundwater projects, and other [eligible projects](#). Some states do not fund private systems or private entities.

Here are some examples of water infrastructure projects that can be funded using SRFs.

EXAMPLES OF DRINKING WATER SRF PROJECTS

-  Rehabilitation, replacement, or installation of pipe: for example, replacing lead service lines with pipes made of safe materials
-  Upgrade facilities to comply with SDWA regulations: for example, improving filtration and disinfection systems
-  Develop new sources of drinking water to increase drought resilience or replace contaminated source: for example, establishing alternative supplies through surface water or ground water

WHAT IS WATER INFRASTRUCTURE?



Water infrastructure includes centralized infrastructure that collects, treats, and distributes water and wastewater, like treatment plants, pipes, and detention ponds, as well as distributed infrastructure that occurs across a community or service area, like smart meters, leak detection devices, graywater systems, and rain catchment. Nature-based solutions play into water infrastructure as well—maintaining watershed health, improving climate resiliency, controlling water flows, filtering water and more.

Examples from US EPA's [DWSRF Eligibilities](#) and [CWSRF Eligibilities](#).

EXAMPLES OF CLEAN WATER SRF PROJECTS

-  Manage, reduce, treat, or recapture stormwater or subsurface drainage water: for example, installing new interceptors, constructed wetlands, and new collector sewers
-  Assessment and planning activities related to water quality, such as water and energy audits, developing an asset management plan or climate adaptation/drought management plans
-  Construct a publicly owned treatment works (POTW) to treat sewage and wastewater
-  Manage nonpoint source pollution
-  Construct nature-based solutions

States can also use their SRF programs to offer financial assistance in the form of refinancing, purchasing a community's SRF-eligible debt, providing loan guarantees, and investing funds to generate interest earnings that remain in the fund.



[See Initial Information Gathering – Questions for Reflection worksheet](#)



[See CWSRF section](#)

[See DWSRF sections](#)



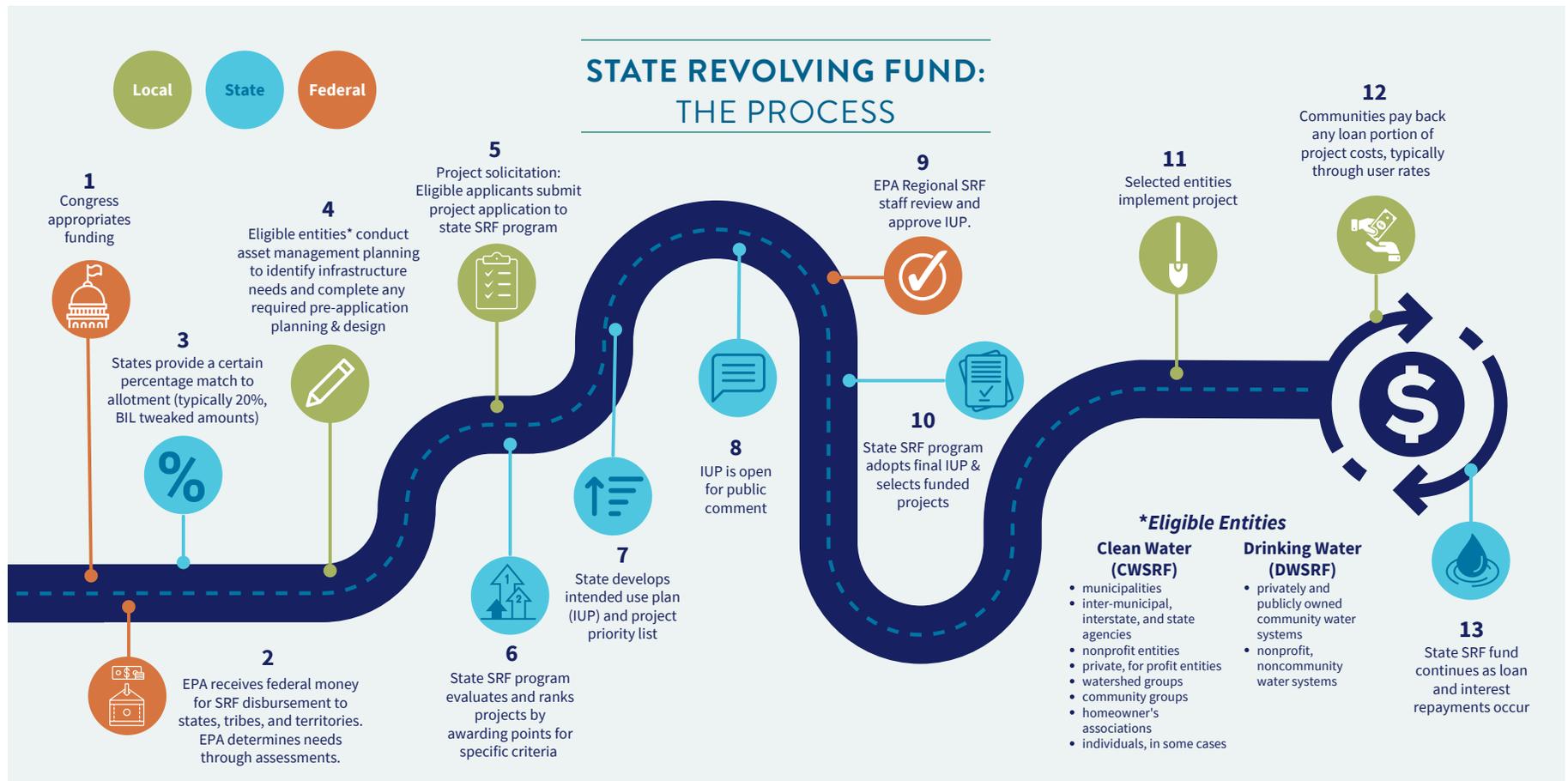
Intended Use Plan (IUP): Each state creates an annual IUP describing the state's process for ranking projects for selection, set-aside activities, how they have defined and prioritized disadvantaged communities (DACs) for the DWSRF and affordability criteria for the CWSRF, and a list of all projects seeking funding in the next fiscal year (the project priority list). [\[Click to hop to IUP section\]](#)

Project Priority List (PPL): The list of projects a state intends to fund. Projects are prioritized based on ranking criteria. Projects are ranked based primarily on if they address the most serious risks to human health; are necessary to ensure compliance with the requirements of the Clean Water Act or Safe Drinking Water Act; and assist systems most in need. States have different approaches to project ranking. The number of points used varies by state (i.e., New Jersey's DWSRF projects can get a maximum 3,226 points, while Indiana's DWSRF projects can receive up to 100 points). PPLs may be updated multiple times a year.

Once states receive their **capitalization grants** from the EPA, states determine their own calendar for both the CWSRF and DWSRF project application and prioritization deadlines. Once applications are received and priority projects are identified, the state is required to create its annual Intended Use Plan (IUP) and often an accompanying Project Priority List (PPL), which are both made available to the public. Once these draft documents are published, the state is legally obligated to provide a public comment period for stakeholders' input. There is no minimum comment period length requirement for the DWSRF or CWSRF. Some states have a three-week period, while others have 30-day comment periods. It is critical that these periods provide sufficient time for stakeholder review and comment. Public comment periods provide one opportunity to engage in the

SRF implementation process, but building relationships with agency staff and/or utility staff is also crucial to communicating your policy desires for the program. Meeting with state SRF staff to discuss your priorities and concerns prior to public comment periods can help them be better prepared to understand and address your comments and create opportunities for an ongoing and productive relationship.

The graphic below provides a bird's-eye view of the SRF process, from the appropriation of funding by Congress to project implementation. Contact your state SRF program staff for details on timelines and specific requirements like completing pre-application forms. Some of the steps outlined in the graphic may occur at the same time.



Find this graphic in the [tools section](#) to download or share!