



February 15, 2022

Assistant Administrator Radhika Fox  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Technical Assistance for the Clean Water and Drinking Water State Revolving Funds

Dear Assistant Administrator Fox,

The Infrastructure Investment and Jobs Act (BIL) provides the U.S. Environmental Protection Agency (EPA) and the Clean Water and Drinking Water State Revolving Funds (SRFs) with a historic opportunity to expand access to federal funding for water infrastructure that protects public health and the environment. The BIL provides unprecedented funding for technical assistance to help more disadvantaged and underserved communities than ever before. Providing high quality technical assistance is essential for achieving our shared commitment to help these vulnerable communities achieve their infrastructure goals.

The vast majority of technical assistance providers are passionate and dedicated advocates for disadvantaged and underserved communities. However, the historic funding provided in the BIL – more than \$1 billion for administration, including a minimum of \$478,928,000 for non-governmental providers of technical assistance – may attract providers who lack the knowledge and skills to adequately serve these communities.

Implementing a transparent and performance-based system of training and accountability for providers will achieve three important goals.

- First and foremost, it will ensure vulnerable communities receive the informed and professional assistance to help them access the funding they deserve and so desperately need.
- Second, it will ensure taxpayer funds achieve measurable benefits in public health and environmental protection for the most vulnerable Americans, while preventing fraud, waste and mismanagement.
- Third, it will reduce the barriers of entry for new providers who bring the fresh perspective needed to accomplish transformational outcomes.

The Clean Water and Drinking Water SRFs currently provide a range of technical assistance, from financial planning and accounting services to disaster preparedness and asset management to operator training and workforce development. Now, more than ever, EPA and the SRFs must work together to make the most of this historic opportunity to help more disadvantaged communities than ever before.

To ensure disadvantaged and underserved communities get high quality technical assistance, CIFA offers the following recommendations:

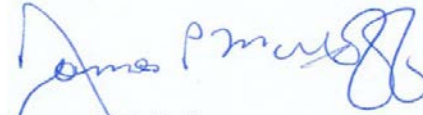
- Consider allotting a portion of the technical assistance funding to SRFs based on approved plans.
- Establish a working group with SRFs and other state agencies to brainstorm on ways to deliver the most effective technical assistance.
- Work collaboratively with the SRFs to develop the criteria for selecting providers.
- Allow SRFs to approve the scope of work for providers in their state, which will ensure a cohesive approach to achieving federal and state priorities.
- Require providers to meet initially and periodically with the SRFs to assure they are fully prepared to discuss that state's SRF process with potential applicants.
- Develop a cost-effectiveness analysis that incentivizes project completion while recognizing that these projects can take significant time and effort to shepherd through the process, from pre-development to end of construction.

Additionally, please consider these factors in the selection of technical assistance providers:

- Providing "boots-on-the-ground" technical assistance is critical to success. Webinars, presentations, and workshops may reach larger numbers of potential applicants, but nothing is more effective for helping disadvantaged and underserved communities than sustained in-person technical expertise.
- Offering a wide array of technical assistance will ensure disadvantaged and underserved communities have access to the services they need but wouldn't otherwise be able to obtain, such as providers who can develop preliminary engineering reports or conduct rate studies.
- Ensuring front-line workers understand the federal framework as well as state-specific laws, rules and processes for the SRFs will ensure providers can efficiently and effectively serve disadvantaged and underserved communities.

Thank you for your commitment and partnership. The SRFs look forward to working with you to achieve transformational results with the historic funding provided by the Biden-Harris Administration and Congress through the Infrastructure Investment and Jobs Act.

Sincerely,



James P McGoff  
COO and Director of Environmental Programs  
Indiana Finance Authority  
CIFA President

CC: Dr. Andrew Sawyers  
Dr. Jennifer McLain  
Bruno Pigott  
Wendi Wilkes

### **About CIFA**

CIFA is a national not-for-profit organization that represents the Clean Water and Drinking Water State Revolving Funds (SRFs), the nation's premier programs for funding water infrastructure that protects public health and the environment.

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