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**Lead Service Line Inventory**

**Funding Program**

**Frequently Asked Questions (FAQs)**

**Last updated: January 2024**

**New information highlighted in yellow.**

1. **Can my utility apply for assistance from multiple programs? For example, beginning in 2024, a utility with 700 service connections may apply to the SRF Loan Program and the LSL Inventory Program for assistance with inventory work.**

Yes. The arrows in **Figure 1** shows which programs communities can simultaneously utilize.

Diagram

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***Figure 1:*** *IFA’s three funding paths for assistance with Lead Service Line Inventory work. Arrows indicate that utilities can apply to muliple programs at the same time.*

1. **Can utility staff perform the inventory work and the utility be reimbursed?**

No. The IFA is not able to fund lead service line inventory work completed by utility staff. The IFA can only fund work that is encompassed by a contract with a third-party provider.

1. **I have already spent funds on inventory work. Can I use the IFA LSL Inventory funding to get reimbursed?**

No, but you could apply to use the funds for LSL replacement planning (Type II) or validation work (Type III).

1. **Why are there different processes for Noncompetitive Funding compared to Competitive Funding Project Types?**

The IFA is prioritizing funding so that all utilities can receive assistance in complying with the new federal Lead and Copper Rule and submitting an inventory to IDEM. As a result of making Noncompetitive Funding available, the amount of Competitive Funding is limited and subject to a more competitive process.

1. **I want to apply for Round 2 funding but haven’t selected a Service Provider. What should I do?**

Select a Service Provider and apply prior to the closing of Round 2 on February 29, 2024. A Round 3 is not currently anticipated.

1. **What if I already have an ongoing/active contract with a Service Provider?**

Communities in this position have two options:

1. Amend/cancel the contract with the Service Provider and allow the provider to enter into a contract with the IFA.
2. Complete the work for which you have already contracted and apply for IFA funds for another project.
3. **Why must an inventory be submitted prior to applying for Type II or III projects?**

The primary goal of the program is to assist utilities in complying with the Lead and Copper Rule’s requirement of creating an LSL inventory.

1. **Can I apply for Project Type I funds if I have already submitted a basic inventory to IDEM’s** **LSL Inventory reporting portal but would like to complete a more robust inventory (Project Type 1)?**

Yes. For example, perhaps you submitted an inventory based upon your billing system data and your next project will digitize tap cards and/or utilize modeling services.

1. **What is the PWS Portal? What is the State Dashboard?**

The PWS Portal is where utilities will manage their LSL inventories. The State Dashboard is where IDEM will view LSL inventories. Utilities will “upload” LSL data into the Portal. Once uploaded, Utilities will “submit” data to State Dashboard, which triggers additional regulatory steps. Uploading and submitting are separate steps that both happen in the Portal. 120 Water is the technology company that is managing the Portal on behalf of IDEM. To access the Portal, email [support@120water.com](mailto:support@120water.com).

1. **May I apply for different kinds of Type I, II, or III projects? For instance, may I apply to do hydro-evacuation work (Project Type III) and surface testing of service line materials (Project Type III) in a single application using different contractors?**

Yes. Please provide as much information as possible in the online application. If you need to submit additional info, please email[LSLIgrants@ifa.in.gov](mailto:LSLIgrants@ifa.in.gov).

1. **What if I have submitted some but not all inventory data to IDEM. May I apply for a Type II or III Project?**

No. A complete inventory that accounts for the majority of service lines in the service territory must be uploaded to IDEM to be eligible for Type II or III projects. Please note, the IFA does not expect utilities to have fully complete inventories (in other words, 0% unknown service lines remaining) but IFA does expect the submittal to account for the majority of the services lines in the service territory.

1. **What procurement requirements does the grant have?**

The IFA will follow state procurement requirements for service agreements when entering into an IFA Professional Service Agreement with Service Providers.

1. **Does the grant have a match requirement?**

No.

1. **Do other standard SRF provisions apply (Davis Bacon, AIS/BABA, etc.)?**

For most projects (e.g., projects not requiring traditional construction activity), there are no American Iron and Steel, Davis Bacon, or Buy American requirements. Most projects will not require environmental review.

1. **Does the SRF Asset Management Certification rules apply to this program?**

No. However for Competitively funded Projects utilities must comply with the IFA Water Audit and Regional Meeting requirements prior to project completion.

1. **What data source should be referenced for population data?**

The IFA LSL Inventory Funding Program will use IDEM’s [Drinking Water Viewer](https://indwv.gecsws.com/).

1. **What data source should be referenced for Median Household Income data?**

Use “Table S1901: 2017 - 2021 ACS 5-Year Estimate” on the [Census website](https://data.census.gov/) to identify the Median Household Income that best represents the service territory.

1. **What does a “complete, well-defined” Scope of Work mean in the Guidance document?**

It means this information is provided:

* + The data that will be/was evaluated for the inventory project (i.e., tap cards, billing system data, customer surveys, tax parcel information, etc.)
  + The methods you would/did utilize to conduct or supplement the inventory
  + The date you submitted your inventory to IDEM
  + For Type III projects, the methods you will utilize to conduct or supplement the inventory (e.g., excavation, vacuum/hydro-excavation, surface testing of service line materials)
  + What geographic areas will be covered by the project
  + Project timeline
  + Project costs
  + If different kinds of Type I, II, III projects are submitted, please itemize.
  + Description of deliverables

Separate scopes, project costs, and scope of work certifications should be provided for each project type included on the application.

1. **How many rounds of funding will be available? Can I apply more than once?**

IFA will offer two rounds of funding leading up to EPA’s compliance deadline (October 16, 2024). The IFA will accept one application per PWSID per round, with multiple Project Types in each application. Each Project Type will have its own section on the application and will be reviewed and awarded, if applicable, separately. Please note, the funding levels in Table 1 are the maximum amount a utility can apply for in the IFA LSL Inventory Funding Program Round 1 and Round 2.

The Round 1 application period was from April 24 to June 9, 2023 . The application period for Round 2 will be open from January 17 to February 29, 2024. A third round is not currently anticipated.

### **Table 1.** Maximum amount of funds available for Round 1 and 2 by utility size, funding (noncompetitive vs. competitive) and project type.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **IFA Water System Type** | **Number of Service Lines** | **Noncompetitive Funds** | | | **Competitively Awarded Funds** |
| **Type I** | **Type II** | **Type III** | **Type III** |
| CWS 0 | 700-1000 | $15,000 | | | N/A; available from the Alliance[[1]](#footnote-1) |
| CWS 1 | 1001-5000 | $25,000 | | | $100,000 |
| CWS 2 | 5001-10000 | $35,000 | | | $200,000 |
| CWS 3 | 10001-15000 | $45,000 | | | $300,000 |
| CWS 4 | >15001 | $55,000 | | | $400,000 |

1. **How long do I have to complete my project?**

For noncompetitively funded projects all work must be completed within 6 months of agreement execution by the IFA. For competitively funded projects all work must be completed within 12 months of agreement execution by the IFA.

1. **What if my inventory isn’t yet uploaded into the portal but will be before the closing date of Round 2. Can I still apply for a Type II or III project?**

Please do not submit your application until the inventory is submitted to IDEM.

1. **What are IDEM’s requirements for submitting an inventory?**

Please consult IDEM’s [inventory template and guidance](https://www.in.gov/idem/cleanwater/drinking-water/drinking-water-compliance-section/water-systems/drinking-water-and-lead/).

1. **I am a service provider. How does my contract with IFA work?**

IFA will enter into a professional services agreement with your firm.

1. **When will we be notified if we’re selected for a grant award?**

Noncompetitively funded project applications will be awarded as soon as received and approved. Competitively funded projects will be awarded after the application period closes (February 29, 2024) for the IFA to determine amount of available funding.

1. **Will receiving a Type I or II funding assistance decrease my chances of receiving a Type III? Will receiving funds in Round 1 decrease my chances?**

No.

1. **I submitted an IFA LSL Inventory Funding application but now I need to add or change some information. Should I submit a second application?**

No. Do not submit another application. IFA will only review the first application submitted. If you need to add or change information, email IFA at [LSLIgrants@ifa.in.gov](mailto:LSLIgrants@ifa.in.gov).

1. **Can I start my online application but finish it later?**

Yes, there is a “save & continue” feature that allows you to do this.

1. **What if my water system is comprised of more than one PWSID?**

The IFA will accept one application per PWSID per round.

1. **What happens if I cannot use my Noncompetitive funds or only need a portion of the funds?**

If you do not want to or cannot spend your Noncompetitive funds on inventory or replacement planning needs, you can use the Noncompetitive funds on validation work (Type III). If you have no LSL inventory, replacement planning or validation needs but have other drinking water infrastructure needs, contact the SRF Loan Program. If you have no LSL inventory, replacement planning or validation needs then consider yourself fortunate.

1. **My community is undertaking an SRF project with a variety of components (storage, distribution), but it also includes LSL *inventory* and *replacement* work. If we apply for the IFA LSL Inventory assistance for a Type I or II project, will IFA require inventory submitted prior to starting the replacement work funded by SRF?**

No. Utility may use SRF financing to complete LSL replacement work without an inventory submitted to IDEM up until October 2024.

1. **What is needed for final disbursement?**

IFA LSL Inventory Funding Disbursement Request and IFA LSL Inventory Funding Project Completion Certification Form.

1. **By submitting an LSL inventory to IDEM’s State Dashboard using the PWS Portal, does this initiate the requirement related to “completion of a service line inventory” to notify customers within 30 days?**

Yes. Note, submitting an inventory to IDEM’s State Dashboard is a separate step from uploading LSL data, although both steps are done within the Portal.

1. **How can I request help?**

Please submit questions about:

* the IFA’s LSL Inventory Funding to [LSLIgrants@ifa.in.gov](mailto:LSLIgrants@ifa.in.gov)
* the Alliance’s Technical Assistance Program to: <https://www.inh2o.org/>
* the Indiana State Revolving Fund Loan Program to Brett Roberts at [broberts@ifa.in.gov](mailto:broberts@ifa.in.gov)
* the LSL Inventory requirements to IDEM at: [DWBMGR@idem.in.gov](mailto:DWBMGR@idem.in.gov)
* the PWS Portal and State Dashboard to: [support@120water.com](mailto:support@120water.com)

1. Starting in Spring 2024, the Alliance of Indiana Rural Water will assist utilities serving <1000 service connections with hydro-excavation needs related to validation. To apply, register at the [Alliance’s Lead Inventory Technical Assistance website](https://www.inh2o.org/Resources/Lead-Copper-Resources-LCRR/Lead-Inventory-Technical-Assistance-Program). [↑](#footnote-ref-1)