



June 30, 2022

Radhika Fox  
Assistant Administrator, Office of Water  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

RE: Federal Requirements and Crosscutters

Dear Assistant Administrator Fox,

On behalf of the Clean Water and Drinking Water State Revolving Funds (SRFs), the Council of Infrastructure Financing Authorities (CIFA) requests that the U.S. Environmental Protection Agency (EPA) prioritize a comprehensive update to [EPA's handbook on crosscutters for SRFs](#), which hasn't been revised since it was first published in 2003 – nearly two decades ago.

SRFs are responsible for ensuring borrowers comply with federal requirements. As stated in the handbook, "because of the unique nature of the SRF programs – which are managed by the states who, unlike EPA, have a direct relationship with the recipients that must comply with the authorities – compliance activities are carried out mainly by the states and assistance recipients, to the extent authorized under each cross-cutter." However, severely outdated and incomplete guidance on crosscutters makes it impossible for SRFs to ensure compliance.

An update to the handbook is more important than ever. With historic funding from the Infrastructure Investment and Jobs Act and a proliferation of new technical assistance providers offering services, EPA must provide the tools and resources to ensure SRFs can provide providers and borrowers, especially disadvantaged communities, with accurate, current and consistent information about compliance with federal crosscutters. Moreover, providing current and accurate information is essential to preventing a non-compliance finding from an auditor or inspector general, which would be devastating to the financial ability of disadvantaged communities to meet the health and safety needs of their citizens.

Thank you for your consideration.

Sincerely,

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

## **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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