

FEBRUARY 2026

# SRF State Advocates Forum Engagement Report (2025)



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## Executive Summary

The State Revolving Fund (SRF) State Advocates Forum (Forum) fosters SRF policy knowledge-building, interactive peer exchanges, and proactive dialogue among advocates focused on more equitable investment in our nation's water infrastructure. The Forum activates a network of peers who contribute to a collective body of SRF knowledge and work collaboratively to improve state SRF policies and practices.

This report represents a summary of Forum member advocacy submitted to the SRF Forum [Engagement Tracker](#) via the SRF Forum [Engagement Survey](#) from January to November 2025. In-depth interviews were conducted with a subset of survey respondents to supplement survey findings from August to September of 2025. Forum members' strategies led some state SRF agencies to adopt policies and practices that improved outcomes for small and underserved communities seeking funding.

This report is produced annually. The [first report](#) covered two periods—2021–2022 and 2023–2024—and two additional reports will document progress through 2026 and 2027. Across the first two periods, we observed several key trends, including the growing role of coalitions, increased direct engagement with SRF administrators, and a sharpening of policy and programmatic priorities—among other important developments.

The key findings of the 2025 analysis reveal several themes, and commonly held advocacy priorities and strategies reported by Forum members are summarized in this report.

- Forum members share common SRF policy and programmatic priorities, including:
  - Improving accessibility and transparency of Intended Use Plans (IUPs)
  - Making project priority lists (PPL) and intended funding lists more detailed and readable
  - Prioritizing state-defined Disadvantaged Communities (DACs)
  - Improving financing options and other terms of assistance
  - Increasing provision of technical assistance
  - Maximizing utilization of set-asides
  - Strengthening Lead Service Line Replacement programs
  - Strengthening Emerging Contaminants programs
  - Strengthening Green Infrastructure programs
- Coalition-based SRF advocacy remains a strategy carried over from the 2021–2024 Report. Coalitions consolidate and leverage resources and technical capacity to sustain consistent SRF advocacy over time. Most survey respondents (80%) emphasized the importance of partnering with other organizations, and 75% of in-depth interview participants described coalitions as essential for sustaining advocacy efforts.

- A core strategy for influencing SRF policy change is fostering relationships with SRF state administrators. The most effective engagement methods advocates emphasized are maintaining regular meetings with SRF agencies and communicating with administrators outside of formal Intended Use Plan (IUP) comment periods. Despite this progress, challenges remain in certain states, often stemming from administrators' limited capacity, differing goals for SRF administration, or unresponsiveness.
- Advocates have successfully influenced SRF state policies. This report highlights examples from Forum members. Notably, several states have improved DAC definitions, made IUPs easier to understand, and improved transparency by publishing responses to IUP comments online. The findings in this report draw on the collective efforts of advocates from 13 states representing: *Alabama, Alaska, Arizona, California, Illinois, Kentucky, Louisiana, Michigan, Mississippi, New Jersey, Tennessee, Texas, and Wisconsin.*

According to the 2025 survey, the Forum has demonstrably impacted advocates:

- **67%** of respondents reported increased confidence in advocating to administrators for SRF policy improvements.
- **75%** of respondents felt more connected with their advocate peers.
- **60%** of respondents found that the Forum has significantly helped in their overall advocacy efforts.
- **75%** of respondents credited the Forum with contributing to their SRF policy or program successes.

Advocates have achieved significant progress in just four years (between 2022 and 2025) as state utilization of funding from the Infrastructure Investment and Jobs Act (IIJA), also referred to as the Bipartisan Infrastructure Law (BIL), has ramped up, and they demonstrate a strong commitment to strengthening the long-term durability of SRFs. At the same time, with a broadened engagement of advocates in water funding and financing in recent years, there is growing enthusiasm for establishing supplementary mechanisms at the state level and fostering continued connection and knowledge-sharing among peers.

## Acknowledgements

Our goal of gathering and distributing combined years of experience for SRF advocacy would not be possible without our interview and survey participants. We especially thank the interview participants listed below for their additional time and effort in sharing their knowledge and experiences, as well as all contributors who are not directly attributed.

Interview participants whose responses were included in the report:

1. **Marie Campbell**, Engagement Director, Harpeth Conservancy\*\*
2. **Melis Coady**, Executive Director, Susitna River Coalition\*
3. **Anthony Diaz**, Executive Director, Newark Water Coalition\*
4. **Joe Fitzgerald**, Director of Policy, Milwaukee Water Commons
5. **Norrel Hemphill**, Legal and Policy Manager, We the People of Detroit\*
6. **Usman Mahmood**, Policy Analyst, Bayou City Waterkeeper\*\*
7. **Victoria Miller**, Director of Advocacy Research, Alabama Rivers Alliance\*\*
8. **Kennedy Moore**, State Policy Coordinator, The Water Collaborative of Greater New Orleans\*\*
9. **Roxanne Reimer**, Community Solutions Manager, Community Water Center
10. **Rebecca Shelton**, Director of Policy, Appalachian Citizens' Law Center
11. **Justin Williams**, Senior Manager, Metropolitan Planning Council

Support for this report was provided by the Robert Wood Johnson Foundation (RWJF). Views expressed here are those of the authors and do not reflect the policy or positions of the Robert Wood Johnson Foundation.

\*Represent members of the 2025 SRF State Advocates Forum Community-Based Organization (CBO) Cohort—a nine-month training program focused on SRF policy reform.

\*\*Represent participants of the SRF Southern Cohort convened by one of the Forum co-conveners, PolicyLink, with funding from RWJF. The initiative's goal was to build the capacity of state and community-based organizations on SRF policy reform.

^ Final approval is pending for inclusion of this advocate's experiences in the report. All necessary approvals will be secured before the report is publicly released.

## Introduction

### About the SRF State Advocates Forum

Since its formation in 2022, the SRF State Advocates Forum (Forum) has grown into a dynamic national network to advance equitable and effective State Revolving Fund (SRF) policy reform. The Forum supports advocates at the state level in improving the administration of Drinking Water and Clean Water SRF programs. Convened by four leading nonprofit organizations—Alliance for the Great Lakes (AGL), River Network, PolicyLink, and Environmental Policy Innovation Center (EPIC)—the Forum fosters collaboration, peer learning, knowledge sharing, and collective impact.

### Who and What is this Report For?

Forum members play a pivotal role in holding SRF state administrators accountable to the communities they serve, shaping state SRF program priorities, influencing policy reforms, and ensuring that the SRFs fulfill their mission of delivering safe, reliable, affordable water for all. The audience for our report is our membership—advocates working across 36 states in their self-determined pursuits of more equitable and transparent state SRF policies—by distilling specific examples of SRF policy advocacy from the perspective of their peers.

Forum co-conveners and members have contributed to a large body of work on the SRFs—from technical deep dives summarizing the core elements of the program, to analyses of best practices.<sup>1</sup> This report focuses on the *experience, priorities, and advocacy best practices of Forum members* and does not detail the policy or programmatic background for each issue. We have compiled an [SRF Reading List](#) for the topics discussed in this report for members seeking technical, in-depth analyses of the policy issues referenced.

### Primer on the SRFs + References for Deeper Dives

SRFs operate as revolving loan funds: the money lent to local communities is repaid at below-market interest rates, and the repayments are reinvested into the fund to support new loans. This creates a self-sustaining cycle of funding. The SRFs are capitalized through federal funding, state contributions, leveraging bonds, and program-generated revenue.

States have a lot of discretion in administering the funds, leading to varied approaches for defining disadvantaged communities (DACs), project prioritization processes, terms of assistance, and program transparency across states. IJJA has catalyzed a significant push to reform SRF policies

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<sup>1</sup> Steps were taken in drafting this report to summarize SRF policy interventions and interactions using less jargon; however, the SRF space utilizes a lot of specific terminology and is complex. We recommend readers consult the [SRF Glossary](#) provided by River Network. To further enhance your understanding of CWSRF and DWSRF policy and analysis, please utilize the Forum's topical [Fact Sheets](#) and [Resource Bank](#).

and ensure that communities experiencing historical disinvestment, unaffordable water, flooding, or health impacts from aging water infrastructure, and that restorative, distributive, and procedural justice are practiced by states in allocating SRF funding. The Forum aims to convene community and state-based environmental justice and water advocates and to build their capacity to support this agenda.

For additional background on the significance and impact of SRFs, see the corresponding section in the [2021-2024 report](#).

## Key Findings and Insights from Forum Members

This 2025 report highlights key trends in the advocacy efforts of Forum members working to influence SRF policy and program changes in their states. The findings summarize advocacy efforts submitted by Forum members between January and November 2025. This input was collected via the SRF Forum [Engagement Survey](#) and tracked in the SRF Forum [Engagement Tracker](#).

To enhance the survey results, in-depth interviews were also conducted with a subset of respondents from August to September 2025. Critically, the strategies employed by Forum members led state SRF agencies to adopt new policies and practices, resulting in improved funding outcomes for small, underserved communities.

This annual report is produced to document advocacy engagement and programmatic shifts resulting from Forum members. The inaugural (2024) report documented multiple years of advocacy, over distinct periods: 2021–2022 and 2023–2024. This report summarizes results for 2025. Future reports will track developments through 2026 and 2027. During the first two periods, notable trends included an increase in the role of coalitions, greater direct engagement with SRF administrators, and a more focused approach to policy and programmatic priorities, as well as other significant changes.

Four years after IIJA prompted increased attention on SRFs, we see sustained engagement—such as continued effort to meet with SRF administrators and more IUP comments submitted to elevate community perspectives.

Policy and programmatic improvement successes advocates reported included: improved definitions of DACs, increased utilization of set-asides and provisions for Technical Assistance, and making intended use plans easier to navigate. The [Results section](#) of this report outlines these improvements and includes examples of successes and members' advocacy experiences. To dive into the technical details behind the SRF program policy areas described in this report, refer to this [SRF Reading List](#).

Although this report summarizes in-depth insights from Forum members through a comprehensive Engagement Tracker Survey and/or in-depth one-on-one interviews, the co-conveners recognize that these findings complement the many spaces in which Forum members contribute their stories and advocacy learnings.

Forum members also regularly contribute to the broader body of knowledge on SRF advocacy challenges and successes through shared peer spaces, such as quarterly convenings, regional peer exchanges, in-depth walk-throughs, technical sessions, and in-person gatherings. This report is intended to complement those discussions with specific, in-depth advocacy insights from Forum members to benefit their peers. The co-conveners are grateful to our Forum members for their contributions to this report and the Forum community of practice.

## Methodology

This report draws on qualitative and quantitative data from the SRF Engagement Survey and in-depth interviews. The primary data for this report is derived from responses to the SRF Advocates Engagement Survey, with 12 responses collected in 2025 and 12 in-depth interviews (Interviews) in the same year. Although we received 12 survey responses and conducted 12 interviews, the two groups do not fully overlap. However, seven participants completed both the survey and an interview; therefore, the results reflect two complementary data sources rather than matched pairs.

The Interviews supplement and validate survey findings. The qualitative data offer a more nuanced understanding of Forum members (hereafter referred to as “advocates” in this report) strategies, challenges, and experiences, enhancing the robustness and interpretive depth of the survey results.

## Data Sources + Data Collection Practices

### Forum Member Engagement Tracker

The [SRF Engagement Survey](#) (Survey) tracks member organizations' advocacy strategies and impact since 2022. The voluntary survey, conducted via Google Forms, includes 16 questions—open-ended and multiple-choice—focused on advocacy strategies, their effectiveness, and lessons learned. This report summarizes responses collected from January to September 2025.

The overarching goal of the survey is to identify trends and patterns over 2022–2027, a period during which IJJA has raised the profile, capacities, and dynamism of state SRF programs. The survey annually measures and compares advocacy efforts across years. Specifically, the survey tracks advocacy actions, outcomes, challenges, and successes, as well as feedback on Forum services. The measure of 'success' or 'effectiveness' is based on survey respondents' self-assessments and self-reported evaluations.

The 2025 survey was updated—reducing the number of questions from 20 to 16. Key questions were retained to inform trends across survey years (e.g., barriers, successes, and perceived value of the Forum). The Forum co-conveners regularly review and iteratively improve the survey to make it easier for resource-strapped members to complete while balancing our ability to distill and track the impact of advocacy efforts.

## Forum Member Interviews

One-on-one interviews were conducted in July and August 2025. The interviews gathered additional insights on the progress of advocacy and explored the strategies employed by members. We explained to participants that these conversations help surface nuances about successes, remaining barriers, and how their experiences can inform stronger, more equitable outcomes. We also noted that interviews provided a deeper context for survey responses among participants who completed both the survey and the interviews.

Interviewees were selected to capture geographic diversity and a range of SRF advocacy experience, from organizations that are new to the space to those involved for several years. The sample was intentionally structured to center community-based organizations (n=8) while also including state-based organizations (n=4).

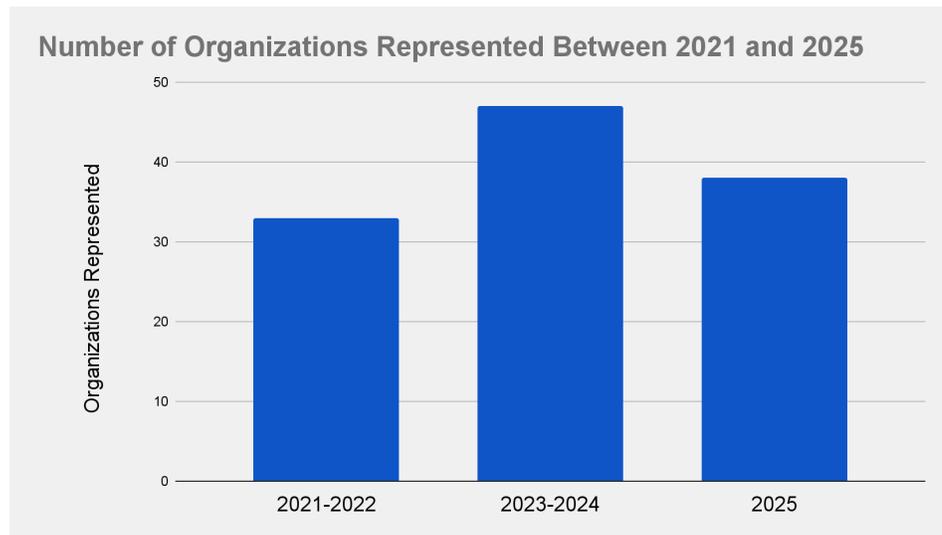
To ensure variation from the 2024 interview cycle, 10 of the 12 interviewees were new participants; two repeat interviewees were included to track progress over time and maintain geographic representation. For comparison, the 2024 cycle included eight interviewees.

Interview questions are [available online](#). Questions focus on policy priorities, engagement tactics, challenges, successes, future SRF advocacy goals, and the perceived value of the SRF Advocates Forum. All interviews were conducted via Zoom, recorded, and transcribed.

## Results + Member Advocacy Priorities

### Participation in Surveys and In-Depth Interviews

The survey and in-depth interview were conducted in August through September 2025, covering advocacy conducted in Federal Fiscal Year 2024/State Fiscal Year 2025. Based on member entries in the Engagement Survey and interviews, advocacy participation within the SRF ecosystem has remained strong and relatively stable, with an average of **39 organizations engaged across each of the three survey periods**. See Figure 1.



**Figure 1. Number of Organizations Represented by Survey Year**

The respondents of the survey and in-depth interviews in 2025 represented 14 states: Alabama, Alaska, Arizona, California, Illinois, Kentucky, Louisiana, Michigan, Mississippi, New Jersey, Oregon, Tennessee, Texas, and Wisconsin.

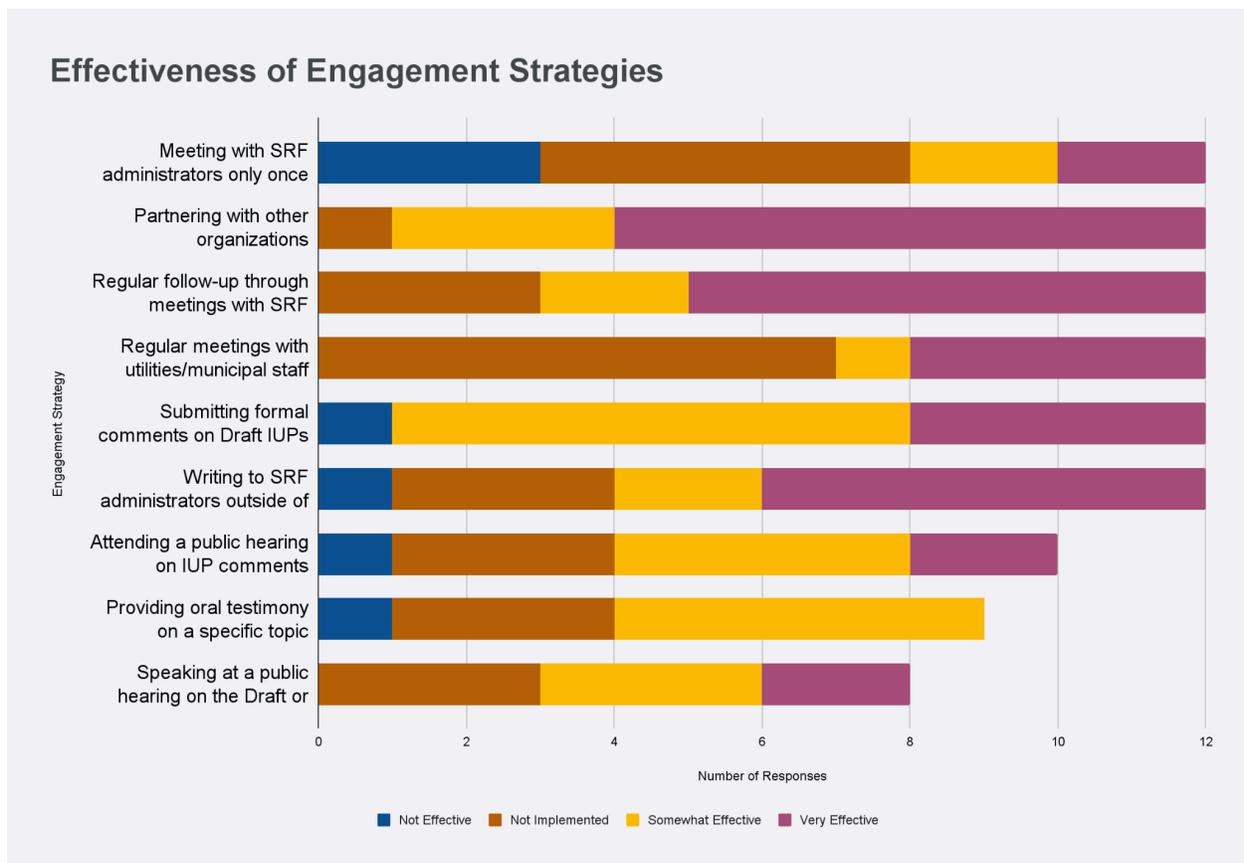
Across the three survey periods, **22 organizations engaged in SRF advocacy in at least two periods, demonstrating a repeated** commitment and visibility in SRF-focused work. Organizations engaged across at least two of the three survey periods often served as anchors or conveners within SRF advocacy networks, shaping shared agendas and driving continuity in messaging.

**Five organizations engaged in all three survey periods**, signaling sustained leadership or institutional presence in SRF advocacy spaces. This level of continuity is likely undercounted; we estimate that more organizations were just as active over time but do not appear in our dataset because they did not respond to surveys or were not interviewed. See the [Future Goals](#) section of this report for a discussion of planned efforts to increase survey participation.

Overall, this persistence in multi-year advocacy engagement indicates a dedicated effort, with long-term strategies continuing to shape SRF policy priorities.

## Effectiveness of Engagement Strategies

The 2025 survey asked respondents to identify the most effective advocacy strategies. Survey results indicate that ongoing relationship-based strategies were viewed as the most effective for improving SRF equity, transparency, and accessibility—particularly **partnering with other organizations, holding regular follow-up meetings with SRF administrators and utilities, and writing to SRF administrators outside of the IUP comment periods**, which received the highest “very effective” ratings. The measure of 'success' or 'effectiveness' is based on survey respondents' self-assessments and self-reported evaluations. **See Figure 2.**



**Figure 2. Effectiveness of Engagement Strategies (2025 Survey Responses)**

**Submitting formal comments on draft IUPs** was the most frequently used strategy. A combined 90% of respondents found this strategy to be effective: 60% rated it as “somewhat effective,” and 30% rated it as “very effective.” The perception of written comments as effective was supported by interview data:

- *Tennessee*<sup>2</sup> – Harpeth Conservancy (HC) initially submitted an extensive 18-page response to the IUP for State Fiscal Year (SFY) 2023-2024. This large submission prevented the Tennessee Department of Environmental Conservation (the SRF agency) from addressing all of their comments. Through subsequent meetings with the agency, HC learned to make their requests more manageable and targeted. In this year’s comments, HC focuses on smaller, more achievable asks, such as greater transparency on the SRF website and timely information sharing, while still advocating for foundational improvements, such as updating the state’s DAC definition.
- *Oregon* – Verde’s state administrator engagement in prior years of advocacy (between 2021 and 2024) focused on requesting technical edits for clarity ( e.g., on the state’s DAC definitions); however, the state SRF agency did not publicly respond to submitted comments. It wasn’t until 2024, when Verde explicitly requested responses and referenced best practices from other states, that the agency publicly posted comment responses on its website. However, due to capacity constraints and the highly technical nature of reviewing IUPs and engaging on SRF state policy, Verde decided not to submit comments in 2025, even though they recognized the value of doing so. They indicated they might re-engage again in the future, pending capacity.
- *Alabama*<sup>3</sup> – Alabama Rivers Alliance (ARA) also reported that their IUP commenting strategy has evolved over the past year. Earlier comments were more policy-dense, but in 2025, they shifted—based on guidance from the new SRF administrator—to shorter, targeted comments drafted with coalition partners to improve accessibility and reflect the limited capacity of the SRF agency, Alabama Department of Environmental Management. However, this adjustment has not increased administrator receptiveness, leading the organization and its coalition to focus more on direct utility outreach by developing handouts, sharing resources, and connecting utilities with technical assistance providers rather than relying primarily on detailed policy comments.
- *Alaska and Mississippi* – Susitna River Coalition and Mississippi Communities United for Prosperity submitted IUP comments for the first time, which led to direct acknowledgement from administrators, as they were the first groups in the agency’s history to submit such comments. This type of action provided initial visibility for their organizations to the respective state SRF agencies.

The following quote from Appalachian Citizens Law Center demonstrates that while submitting comments on the IUP may not immediately achieve desired outcomes—such as policy change,

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<sup>2</sup> Tennessee advocates include: Harpeth Conservancy, Young, Gifted & Green, Protect Our Aquifer, and the Native American Indian Association of Tennessee.

<sup>3</sup> Alabama advocates include: Black Warrior Riverkeeper, Blackbelt Women Rising, Cahaba Riverkeeper Inc, Friends of the Alabama River, Southern Poverty Law Center Alabama State Office, Voters Legal Justice Watch Group, Water Finance Exchange, Southern Environmental Law Center, Cahaba River Coalition.

greater transparency, or improved relations with the SRF agency—it is nonetheless valuable. This action is crucial for maintaining the organization's visibility in SRF policy reform and for creating a documented record that holds the government accountable.

“For the past three years, we've commented on the state IUP and met with leaders at the agency charged with distributing the SRFs. Our comments have focused on ensuring a more robust public notice process around the IUP comment period, pressed the state to develop more critical and thoughtful criteria for identifying disadvantaged communities, and advocated for a more equitable distribution of funding among approved projects. Unfortunately, we've made little progress. We want to keep showing up as advocates in this space but it has been discouraging.”

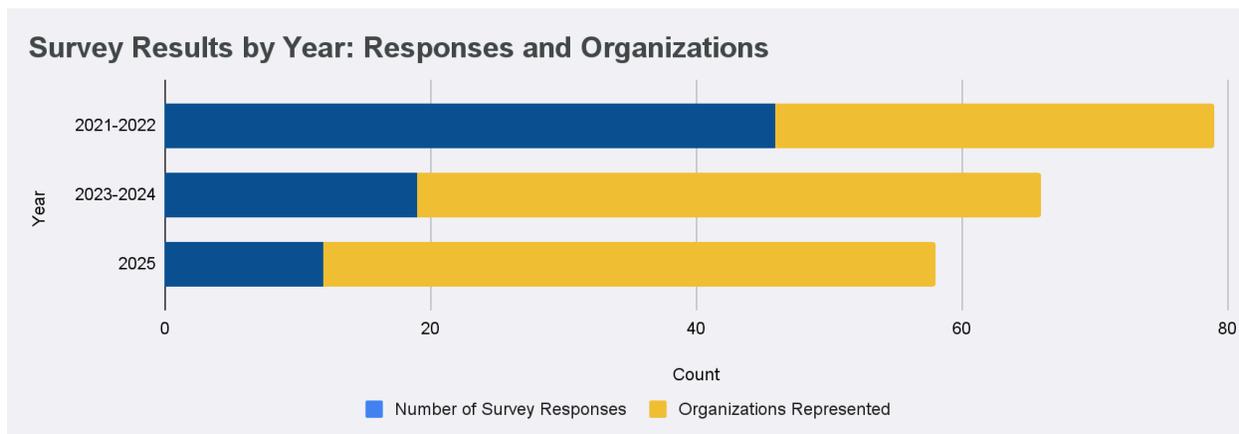
- Rebecca Shelton (Appalachian Citizens Law Center)

## Emphasis on Relationship Building

### Continued Importance of Coalitions

Participation in advocacy within the SRF ecosystem has remained strong and relatively stable, with an average of 39 organizations engaged across each of the three review periods. Even though the number of survey responses has decreased across the three survey periods, the total number of organizations represented by respondents has remained somewhat steady between the 2023–2024 and 2025 periods. See Figure 3.<sup>4</sup>

The 2025 data confirms a persistent trend: advocates engage in SRF advocacy primarily through coalitions, rather than as standalone entities. However, four individual organizations were observed to have completed the engagement survey; of these, three were new to the SRF space. In 2025, three new organizations engaged.



**Figure 3. Number of Survey Responses by Survey Year.**

<sup>4</sup> The organizations represented in each period is as follows: 33 (2021–2022); 47 (2023–2024); 46 (2025).

The significance of coalitions was reiterated in the in-depth interviews, in which 75% of participants described coalitions as essential to sustaining advocacy efforts. Interviewees shared specific examples of how coalitions have advanced SRF reforms, including (by state):

- *Texas* – Engagement in SRF processes by community-based organizations (CBOs) and advocates has grown significantly. Previously, only a handful of groups participated; however, as of 2025, meaningful participation includes as many as 20-30 organizations in coalition.<sup>5</sup>
- *Wisconsin* – Coalition building helped Milwaukee Water Commons (MWC) strengthen its advocacy and amplify the urgency of policy changes statewide, rooted in community needs. According to the organization, being in coalition with other organizations across the state strengthened direct engagement with utilities and the Wisconsin DNR, contributing to wins such as improving the state’s definition of DACs. Coalition(s) promoted shared capacity and amplified advocates’ equity-focused, public comments, which were more robust and better-informed by data and analyses. State agencies began to recognize and respond to broader community perspectives; Wisconsin DNR improved the state definition of DACs in addition to other policy and program wins reported in this and the [2021-2024 report](#).
- *California* – Coalition-building brought together organizations<sup>6</sup> with shared goals— Working together allowed them to align their advocacy messages, address common challenges with a unified voice, and amplify their impact. This collaboration was especially important for advancing policy changes and ensuring that advocacy efforts benefited small and underserved communities reliant on domestic wells and affected by emerging contaminants (ECs).

## **Continued Importance of Relationships with SRF Administrators**

SRF agency administrators play a pivotal role in shaping the effectiveness of an SRF program. In every state, SRF administrators have discretion to set key SRF policies through IUPs; in many states, they have the authority and flexibility to determine nearly all state SRF policies that govern how financing and additional subsidies are distributed to communities across the state.

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<sup>5</sup> Texas advocates include: Bayou City Waterkeeper, the BCWK Community Research Action Network (CRANe), the Rio Grande International Study Center, the Coalition for Environment, Equity, and Resilience (CEER), the Fort Bend County Environmental Organization, Air Alliance Houston, Achieving Community Tasks Successfully, Healthy Gulf, the Coastal Prairie Conservancy, the Northeast Houston Redevelopment Council, the Bayou Land Conservancy, Clean Water Action, West Street Recovery, the Coalition of Community Organizations, and the CEER Climate Ambassadors, National Wildlife Federation - Texas, Galveston Bay Foundation, Greater Edwards Aquifer Alliance, The Nature Conservancy in Texas.

<sup>6</sup> California advocates include: Community Water Center, Leadership Council for Justice and Accountability, and Clean Water Action.

Engagement with SRF administrators has remained an essential engagement strategy in advocacy efforts. Regular follow-up through meetings with SRF administrators was reported as “very effective” by 60% of survey respondents. Additionally, 50% stated that writing to SRF administrators outside of IUP periods was also “very effective.” **See Figure 2.**

The importance of building relationships with SRF administrators was supported by interview data, as demonstrated in the quote below:

“We want to stay consistently engaged with administrators—showing up in their inboxes and becoming a regular part of their workflow—and we think it’s working. In one meeting with TDEC and the SRF administrator, we learned about a small system in Clifton, Tennessee, that secured both Clean Water and Drinking Water SRF funds to install a PFAS filter. They received \$10 million in total principal forgiveness, which made the project financially feasible—something we wouldn’t have known about without our regular meetings.”

- Marie Campbell (Harpeth Conservancy)

- ARA and partner organizations successfully maintained quarterly meetings with state administrators in 2025 to discuss the SRF process, even amid a significant agency leadership transition that strained relationship-building overall.
- Texas advocates reported, as reported by Bayou City Waterkeeper and National Wildlife Federation - Texas Chapter, notable success by convening a "Think Tank" meeting with SRF staff. This session, structured as an open-ended discussion, served as a collaborative negotiation and brainstorming forum, aligning the advocates' policy and program recommendations with the capacity of the Texas Water Development Board (TWDB). Key discussion points centered on improving the state DAC definition. Specifically, advocates recommended incorporating census-tract-level data to more accurately identify and include socially vulnerable communities in urban areas that are often overlooked. TWDB informed advocates that implementing changes would take considerable time. While advocates are still focused on improving Texas’s DAC definition, they pivoted slightly to include exploring potential changes they could pursue over the next year or two. Despite this, TWDB showed interest in several of the ideas presented, and both parties agreed to schedule a follow-up meeting to continue the discussion. This action reinforced the advocates’ credibility and constructive relationship with agency staff.
- The Community Water Center (CWC) in California demonstrated the value of direct engagement between funders and communities by bringing funding administrators into rural communities to enable residents to directly advocate for funding to help connect their community to centralized utilities. This approach highlights the need to prioritize these communities for increased funding. In one notable instance, CWC hosted State Water Board members and staff on-site, a visit that proved crucial in securing their

support and involvement. This direct interaction also allowed CWC to provide technical recommendations that ultimately ensured the project's successful completion.

The 2025 in-depth interviews underscored the critical role of engaging productively with SRF administrators, emphasizing curiosity, collaboration, and information sharing. However, the interviews also revealed that sustained SRF staff engagement must sometimes overcome challenges such as changes in the administrative staff. These include high staff turnover within agencies and diminished staff capacity, exacerbated by federal funding cuts and a continued reluctance among administrators to routinely collaborate with advocates on policy and program recommendations.

### **Advocacy to Utilities and Municipalities Has Impact**

While direct engagement with State SRF Administrators is common, a parallel and critical focus for advocates is cultivating strong, trust-based relationships with local utilities and municipalities, particularly those serving historically underserved communities. Iterative review of prior survey and interview responses indicated municipality/utility engagement was an important strategy; as a result, the following question was added to the survey in 2025: "How effective have the following strategies improved the equity, transparency, and accessibility of SRF programs and policies in your state? [Regular meetings with utilities/municipal staff]."

**50% of respondents reported that regular meetings with utilities and municipalities were "somewhat" or "very effective."** According to interview data, these meetings typically aimed to understand utility perspectives on SRFs, share information about funding and technical assistance opportunities available under the SRF programs, and determine barriers to application (e.g., lack of knowledge, capacity, or aversion to debt). Furthermore, these meetings provide an opportunity to assess whether and/or how the utility's prioritization of projects aligns with community needs.

Verde, MWC, and ARA directly engaged with water utilities. All three organizations emphasized the critical role utilities play in accessing SRF loans and additional subsidies, which ultimately determine if and how funds reach the most vulnerable communities.

For example, in 2025, the Wisconsin SRF agency, Wisconsin Department of Natural Resources (WDNR), issued a draft IUP proposing a cap on principal forgiveness (PF) from the IIJA LSL funds. Whereas previously there had been no cap, WDNR proposed that no applicant could receive more than 25% of the total available PF for the funding cycle. Inventories indicate that the City of Milwaukee has more than 40% of the LSLs remaining in the state, and the proposed cap threatened to disrupt the momentum of Milwaukee's LSL replacement program and its ability to meet the federal mandate to remove its 65,000+ lead pipes by 2037, a goal Milwaukee has been on track to achieve.

MWC submitted comments raising concerns about the proposed cap, and, following discussions with MWC and other coalition advocates about the policy, Milwaukee Water Works (utility) also submitted comments challenging the proposed cap. As a result, WDNR agreed to waive the cap for

utilities with more than 25% of the total lead pipes in the state; in such cases, the cap would instead be equivalent to the percentage of the statewide LSLs in the applicant's system. This demonstrates how advocates can engage utilities on state SRF policies and increase their leverage through coordinated policy advocacy with the utility.

HC and ARA noted that a key factor in whether utilities pursue SRFs is their level of awareness of how the SRF programs and supplemental IJJA funding operate, and of the value of using low-cost debt to ensure long-term water security. Advocates have helped bridge the gap between utilities and SRF agencies by connecting their staff, providing information on state SRF programs, and connecting them to state-offered Technical Assistance opportunities.

The following quote illustrates one way that advocates are working to increase access to SRF funding for vulnerable communities, primarily through fostering relationships with utility providers.

“One thing we’ve been advocating for is plain-language education for utilities about the SRF program. We even hosted our own webinar explaining what BIL [IJJA] is, why the funding exists, what it can be used for, and where utilities can find resources to apply for it. We can’t provide that support ourselves, but the [SRF] agency has many tools that should be more actively used to help utilities access the [SRF] program.”

- Cheyenne Holiday (Verde)

## Continued Visibility of Advocates in the SRF Space is Pivotal

Along with working on specific SRF policy and program change, maximizing visibility of advocates and their priorities continues to be an effective strategy for survey respondents. Advocates listed the following methods to achieve and maintain visibility with SRF administrators: submitting comments on IUPs, holding regular meetings, corresponding outside IUP comment periods, and attending or speaking at public hearings.

In 2025, speaking at public hearings and providing oral testimony was the least used and viewed as less effective (**See Figure 2**). For certain organizations, however, the approach proved effective by increasing visibility and advancing their specific policy or program recommendation, as demonstrated in the quote below.

“We don’t usually get many people showing up for public comment sessions, so simply being in the room helped demonstrate that these issues [incorporating more points for Green Projects] matter in the communities we represent as a cohort. Our presence made a difference, especially because the recommendations we raised were not addressed fully in the IUP.”

- Kennedy Moore (The Water Collaborative of Greater New Orleans)

Another strategy that emerged from the interviews was leveraging high-profile events to increase visibility and collaboration. Texas advocates timed their outreach to coincide with Texas Water Day, when water leaders, legislators, and agency staff gather at the Texas Capitol in Austin. They used the opportunity to meet directly with legislators and staff to discuss SRF priorities and statewide water needs, and also held a dedicated meeting with the Texas Water Development Board to reinforce their policy recommendations in a coordinated, high-visibility setting.

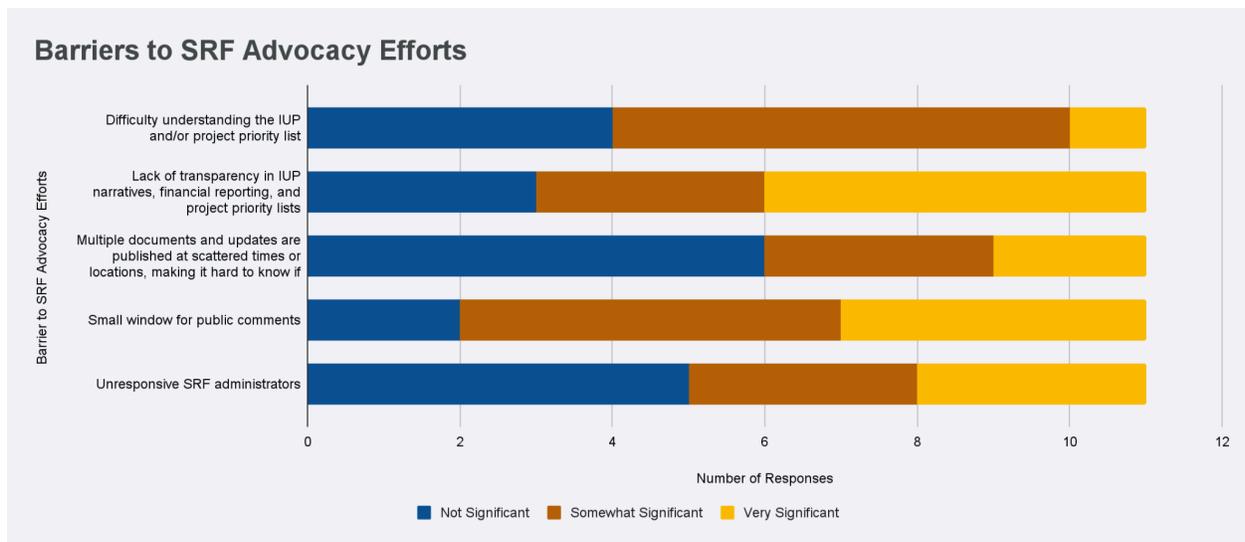
When project proposals do not fit within existing SRF funding guidelines, CWC pursues multiple avenues to remove those barriers. They advocate directly with state administrators to update funding criteria, pursue legislative strategies when statutory changes are needed, and—more recently—have expanded their efforts to include federal advocacy. This multi-layered approach reflects CWC’s commitment to ensuring that funding structures align with the real needs of the communities they serve.

Consequently, 30% of state advocates interviewed plan to initiate active state legislative discussions about water infrastructure. The objective of these discussions is to establish new funding mechanisms to support additional financing and funding opportunities, both within and outside the SRFs.

## Barriers to Advocacy

Advocates identified several structural barriers that hinder meaningful participation in SRF decision-making (See Figure 3). More than **80% of respondents reported that short public comment windows were a significant barrier**, with nearly half rating them very significant. The compressed timelines undermine equity by giving an advantage to well-resourced organizations that can respond quickly, while marginalizing CBOs that need more time to understand, process, and organize input. Further, CBOs have limited bandwidth to engage in SRF-focused advocacy in the first instance and less organizational flexibility to adapt to unpredictable and short timelines. However, this is where coalitions may help combine expertise and resources to respond to IUPs.

Lack of transparency in IUP narratives, financial reporting, and project priority lists was identified as a major barrier, with 50% of respondents rating it “very significant” and another 30% rating it “somewhat significant.” Paired with 64% of respondents reporting difficulty understanding IUPs, the data indicate a systemic information gap. Advocates struggle to both obtain IUP information and build capacity to interpret it within tight response windows, limiting their ability to influence outcomes.



**Figure 4. Reported Barriers to Advocacy in Survey Year 2025.**

The significance of other barriers was more mixed, pointing to diversity in state agency cultures and practices. Approximately 45% of respondents cited unresponsive SRF administrators as significant, but nearly as many, 55%, noted it was *not* a barrier, indicating that some advocates have good relationships with their SRF agency, while others are struggling in this area. For example, Appalachian Citizens Law Center listed this as a barrier, whereas HC highlighted its strengthened relationship with the Tennessee Department of Environmental Conservation as a success for its 2025 advocacy efforts.

Additionally, advocates early in their SRF advocacy made some helpful inroads with SRF administrators—the Susitna River Coalition confirmed Alaska Department of Environmental Conservation received and will review and publish all comments in the final IUPs<sup>7</sup>. Finally, scattered documents and updates across multiple platforms were the least-cited barrier, with more than half saying it was not significant. While this issue affects many advocates (as captured in survey and interview responses), it appears to matter less than the more fundamental barriers of timing, clarity, and transparency.

Systemic barriers limit community organization SRF advocacy. For example, the Newark Water Coalition prioritizes urgent needs such as water and food distribution, which limits its capacity for complex SRF policy work. Despite being drawn into policy discussions, the steep learning curve is a challenge for their small staff. Consequently, the Coalition is focusing on aligning advocacy with existing strengths, such as influencing workforce development and advocating for expanded funding to secure local youth jobs in water utilities—work still supported by SRF and other programs.

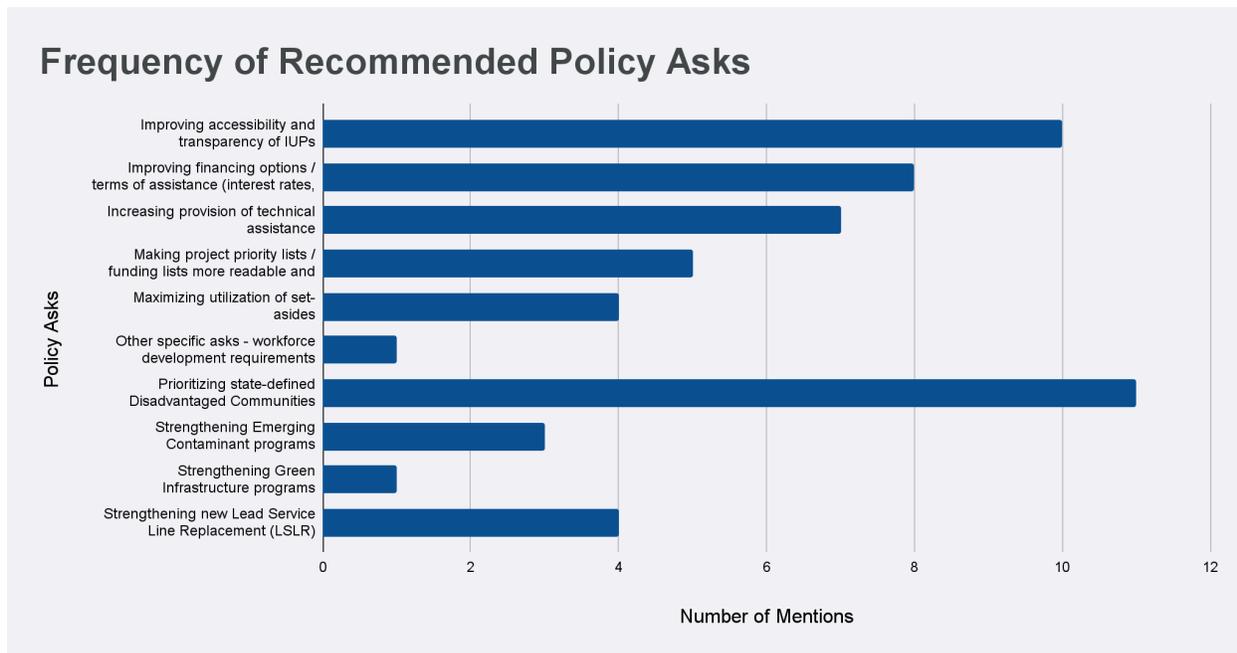
<sup>7</sup> Alaska Department of Environmental Conservation indicated the comment review and processing timeline may be delayed due to US EPA staffing changes.

The barriers to advocacy identified across survey periods remained largely consistent. Overall, the results show that SRF advocacy continues to be constrained by structural conditions that restrict access to information and time—conditions that, if improved, could dramatically strengthen participation, and bring more voices into the SRF advocacy conversation.

## Unpacking the Key Areas of Advocacy

Advocates contributing to this report were active across 14 states in 2025.<sup>8</sup> The most common policy and programmatic points of advocacy for these advocates are summarized below. **Figure 5** provides an illustration of the survey responses for each of the key areas of advocacy :

- 1) Improving accessibility and transparency of Intended Use Plans (IUPs)
- 2) Making project priority lists (PPLs) and intended funding lists more detailed and readable
- 3) Prioritizing state-defined Disadvantaged Communities
- 4) Improving financing options and other terms of assistance
- 5) Increasing provision of technical assistance
- 6) Maximizing utilization of set-asides
- 7) Strengthening new LSLR programs
- 8) Strengthening Emerging Contaminants programs
- 9) Strengthening Green Infrastructure programs



**Figure 5. Frequency of Policy Asks in Survey Year 2025.**

<sup>8</sup> Alabama, Alaska, Arizona, California, Illinois, Kentucky, Louisiana, Michigan, Mississippi, New Jersey, Oregon, Tennessee, Texas, and Wisconsin.

## Improving Accessibility and Transparency of Intended Use Plans

While federal requirements set a basic framework for SRF program operations, states retain significant discretion in their policies and practices. This results in wide variability in the accessibility, transparency, organizational format, clarity of data and information, quality of IUPs, as well as in the details of the state SRF policies they articulate.<sup>9</sup>

In 2025, 82% of respondents made recommendations in this category—a new category added in the 2025 survey based on the findings of the 2024 survey. **See Figure 5.** Examples of recommendations for increased transparency include:

- Calling for clearer explanations of how PF and subsidies are calculated at the project level, and making IUPs more readable (Louisiana).
- Creating a centralized, user-friendly online dashboard with project priority lists, environmental review notices, and funding award summaries (Arizona).
- Providing clearer information on annual funding availability (Alaska).

Interview findings reinforced these concerns, revealing deeper transparency gaps beyond IUPs. Advocates in Alabama, Alaska, Michigan, Oregon, and Texas requested public access to documents that state agencies submit to the U.S. EPA—such as set-aside work plans and Annual Reports listing finalized award agreements. Without access to these materials, advocates struggle to track where funding goes and assess whether DACs are benefiting. This data is essential for holding agencies accountable and guiding community-driven advocacy.

### **Advocacy Actions + Impacts**

Forum advocates' advocacy has resulted in more transparent SRF programs across states, including:

- *Texas* – A key component of making the IUP accessible is providing the public with adequate time for review. For the last three years, advocates in coalition represented by survey respondents have consistently recommended extending the comment period. In response, the public comment period for the 2025 IUP was extended from 18 days to 30 days. The Texas Water Development Board also made more information about project funding decisions and associated outcomes publicly available, and improved its responsiveness to public comments and input.
- *Kentucky* – Timely notification of the IUPs is crucial for advocates, as it eliminates the need for constant website checks or calls to the SRF agency, allowing them to engage sooner. For three years, the Appalachian Citizens' Law Center has requested that the Kentucky Infrastructure Agency utilize its email subscriber list to alert interested parties when IUPs

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<sup>9</sup> For a deeper dive on a nationwide assessment on the accessibility and transparency of SRF Programs read Clean Water Action's [Equitable and Effective Water Infrastructure Spending: Increasing Transparency and Accessibility in State Revolving Fund Programs](#).

are available for review and comment. In 2025, advocates were finally able to speak to the executive director about improving the notification process for IUPs.

- *Oregon* – Publishing the public's comments to IUPs holds the SRF agency accountable for documenting input received. For three years, the SRF agency failed to respond to submitted comments until Verde explicitly requested a response and cited practices from other states. This direct advocacy ultimately led the agency to publicly post its responses to comments.

## **Making Project Priority Lists (PPLs) and Intended Funding Lists More Detailed and Readable**

Projects are ranked based on state-defined criteria. States typically rank projects using point utilities to prioritize projects that will address serious risks to human health, ensure compliance with the Clean Water Act or Safe Drinking Water Act, and assist utilities most in need. States have broad discretion over how they prioritize projects and can include points to incentivize or address various concerns.

Thus, improving these lists with clearer, more detailed, and better-organized project information, and in more accessible formats (rather than as a PDF or a screenshot of an Excel sheet), would better facilitate advocates' own analyses of project prioritization schema impacts.

In 2025, 42% of survey respondents made recommendations in this category. **See Figure 5.** Examples of recommendations include:

- Creating a centralized, user-friendly online dashboard with project priority lists, environmental review notices, and funding award summaries (Arizona);
- Ensuring consistency and accuracy across numbers and tables provided in the PPLs (Tennessee)
- Ensuring both a comprehensive list and a funding list are provided on all IUPs, including for Lead Service Line Replacement and EC programs (Mississippi).

Advocates' attention to these concerns has grown. The percentage of respondents who made recommendations in this category was 52% in 2021–2022 and 80% in 2023–2024.

### **Advocacy Actions + Impacts**

Advocates prioritized advocacy in this category across survey years. Although no specific successes were reported in the 2025 survey, this remains a priority for advocates, and future iterations of this report will continue to track progress toward measurable outcomes resulting from advocacy efforts.

## Prioritizing State-Defined Disadvantaged Communities

How states define DACs and affordability criteria directly impact which projects receive technical assistance, additional subsidies (commonly in the form of principal forgiveness), or other most favorable award terms, such as interest rate discounts or zero-interest loans.

For the DWSRF, states are required to define “disadvantaged communities” to assist water utilities that would face financial, managerial, and technical constraints if they received only loans from the DWSRF. Similarly, under the CWA, states must consider income, unemployment data, and population trends, in addition to other criteria that states may identify, when formulating CWSRF affordability criteria.

Within these statutory guidelines, however, states have broad discretion in how they define DACs and affordability criteria,<sup>10</sup> which directly impacts which projects receive the most favorable funding and financing allocation and terms.

In 2025, 92% of respondents made recommendations to state SRF administrators on how DACs are defined and prioritized for additional subsidization. **See Figure 5.** In particular, advocates focused on strengthening state DAC definitions and affordability criteria to include broader socioeconomic indicators such as income, poverty, affordability, social vulnerability, and environmental justice concerns.

Advocates have also urged states to adopt more flexible geographic parameters for assessing DAC indicators to better capture and benefit DACs within a water system’s service area. Examples included Louisiana advocates urging the use of actual average monthly water use—rather than a fixed 4,000-gallon benchmark—when calculating affordability ratios, and Illinois advocates calling for the removal of population caps and the use of census-tract-level data to define DACs.

Advocates continue to prioritize this policy recommendation because, while improvements to DAC definitions are only part of the solution to directing more funds to small and underserved communities that need them most, they are a critical first step toward accurately identifying and assessing communities’ financial, capacity, and vulnerability needs.

In addition to recommending changes to how states define DACs, advocates also sought to influence how DAC projects were prioritized for funding, caps on the maximum amounts of additional subsidies that can be awarded to DACs, and other policies that determine the allocation of assistance to DACs.

Survey responses across years indicate this is an increasingly pivotal area for SRF program improvement. In 2021–2022, 52% of respondents made recommendations in this category. In 2023–2024, that figure rose to 80%, and in 2025, 92% of respondents engaged in this issue area.

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<sup>10</sup> For a deeper dive, see EPIC’s policy brief, [How States’ Disadvantaged Community Definitions Can Prioritize Access to SRFs for Under-Resourced Communities](#) DAC projects, from 20 to 30 points.

## **Advocacy Actions + Impacts**

Forum advocates have moved policies across states, including:

- *Texas* – The state increased the project prioritization points awarded to DAC projects, from 20 to 30 points, giving urban communities and vulnerable populations greater access to funding opportunities.

## **Improving Financing Options and Other Terms of Assistance**

As states determine how to structure financing—such as interest rates, loan terms, and fees—they make decisions that directly influence whether communities can realistically access these funds. These choices shape both the affordability of projects for under-resourced communities and the long-term sustainability of the SRF programs, underscoring the importance of thoughtful, transparent financing policies.<sup>11</sup>

In 2025, 67% of respondents reported making recommendations in this category. **See Figure 5.** Examples of advocacy priorities include:

- *Alabama* – Getting clarification on factors that determine the varying annual fee rates assigned to projects on the PPL.

## **Advocacy Actions + Impacts**

Advocates prioritized advocacy in this category across survey years. Although no specific successes were reported in the 2025 survey, this remains a priority for advocates, and future iterations of this report will continue to track progress toward measurable outcomes resulting from advocacy efforts.

## **Increase Provision of Technical Assistance**

Technical assistance (TA) refers to services provided by external experts—such as engineers, financial advisors, legal consultants, and grant writers—that supplement a utility’s internal capacity. These services are especially critical for Small and Very Small Systems<sup>12</sup>, which are often under-resourced and face significant barriers to understanding, accessing, and managing SRF resources.

By reducing the burden on under-resourced communities, TA enables increased access to SRFs and helps ensure that funds support high-need, high-impact projects. States can expand TA by

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<sup>11</sup> For a deeper dive, see EPIC’s policy brief, [Optimizing Interest Rate and Other Loan Policies for SRF Financing](#).

<sup>12</sup> EPA defines Small systems as serving fewer than 10,000 people and Very small systems as serving fewer than 3,300 people.

using set-aside funds, subsidizing expert services, and partnering with intermediaries to deliver hands-on support.<sup>13</sup>

Planning grants or loans from a state SRF program can go a long way toward securing access to TA services. Short-term, zero- or low-interest planning grants enable communities to pay for engineering reports, financial audits, and other application and readiness requirements. Services procured with planning grants or loans enable a community to get “project-ready” for construction and significantly increase their ability to secure SRF funding.

In 2025, 58% of respondents recommended improvements to TA programs. **See Figure 5.** The recommendations were the same as in previous years, with an emphasis on:

- Developing new programs for underserved communities to help prepare applications
- Managing awards and, most commonly, fully utilizing available set-aside allowances
- Utilizing planning loans to help communities facing difficulties making it onto the fundable list

Interview conversations underscored the critical need for increased TA funding. Specifically, 75% of survey respondents highlighted the demand for TA and capacity support, noting that it is especially vital for small and rural utilities often lacking engineers, planners, or grant-writing capacity.

For reference, the proportion of survey respondents who recommended improving TA programs was 37% in 2021–2022 and 79% in 2023–2024.

### **Advocacy Actions + Impacts**

Follow-up to survey responses provided the following examples of advocacy impacts:

- *Texas* – Advocates secured a \$1,000,000 reservation of additional accumulated CWSRF fees for the Water Utilities Technical Assistance Program (WUTAP) to improve access to SRF funds through contracted financial, managerial, and technical assistance.

### **Maximize Utilization of Set-Asides**

[Set-aside funds](#) are portions of DWSRF capitalization grants reserved for non-construction and public health protection activities (with the exception of EC funds, which may be used for construction), such as capacity building, regulatory compliance, and public health protection. States may use up to 31 percent of their annual DWSRF base, IIJA General Supplemental, and EC grants for these purposes. Only 26% of statutorily allowed set-asides are relevant to LSLR

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<sup>13</sup> For a deeper dive into an assessment of TA programs nationwide, see Metropolitan Planning Council's report, [A review of the role state governments play in providing technical assistance to water utilities](#).

projects, so generally, states will only set aside up to 26% of their LSLR grants. State SRF administrators have the discretion to decide how much of each federal capitalization grant to allocate as set-aside funds and how these funds are utilized. Consequently, there is significant variation across states on how set-asides are used.

The percentage of respondents making recommendations in this category was 24% in 2021–2022 and 95% in 2023–2024. In 2025, 33% of respondents recommended using set-asides for specific purposes. Recommendations under this category often require either reallocating existing state SRF funds or supplementing federal capitalization grants with state technical assistance resources—both of which can be substantial undertakings for under-resourced state administrators. Examples of recommendations included:

- Maximizing the allowable set-aside funds to support technical, managerial, and financial assistance for projects on the PPL (Alabama).
- Allocating the 4% administration set-aside for wastewater Technical Assistance (California).
- Establishing specific set-asides for multi-benefit green infrastructure projects (Arizona).

### **Advocacy Actions + Impacts**

Follow-up to survey responses provided the following examples of advocacy impacts:

- *Texas:* Advocates successfully advocated for the use of set-aside funds for a Wastewater Optimization Program (WWOP) to help wastewater utilities maximize treatment performance and implement best practices. Over the years, advocates have consistently advocated for efficient and maximized use of set-aside funds, which has led to the creation of programs such as the WWOP.

### **Strengthen LSLR Programs**

The EPA, through IIJA, is providing \$15 billion for LSLR across the U.S., distributed through the DWSRF as a mix of grants and loans. The goal is to replace the estimated 4 million lead service lines nationwide.<sup>14</sup> Of this funding, 49% must go to DACs as grants or principal forgiveness loans. Up to 31% may be set aside for administration, technical assistance, and local capacity building, with the remainder distributed as loans. However, access to these funds often hinges on loan terms that are favorable to lower-income communities.

In 2025, close to 33% of survey respondents made recommendations on how to strengthen new LSLR programs.<sup>15</sup> Examples include:

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<sup>14</sup> For more information about IIJA LSLR program see this [factsheet](#) from the Forum.

<sup>15</sup> States vary greatly in the concentration of LSLs; in states with low presence of LSLs, advocacy in this area will not be prioritized.

- Ensuring that LSLR funds are distributed on a timely basis (Tennessee)
- Making more strategic use of set-asides from its federal capitalization grants to educate and encourage utilities to apply for LSLR funds (Mississippi).

The percentage of respondents offering recommendations to strengthen the LSLR program was 20% in the 2021–2022 survey period and 62% in the 2023–2024 period<sup>16</sup>.

### **Advocacy Actions + Impacts**

Survey responses provided examples of advocacy impacts, including:

- *Wisconsin* – In light of comments from MWC and the City of Milwaukee, the WDNR proposed modifying policies governing the allocation of LSLR funds. In its draft IUP, WDNR proposed imposing a cap of 25% of the total available PF from the LSLR funds on each applicant. The proposed cap would disproportionately affect cities like Milwaukee, which have a very large share of the state's lead service lines (LSLs). Following advocacy, WDNR agreed to waive the cap for applicants with more than 25% of the LSLs remaining in the state. In that instance, the cap will be equal to that applicant's percentage of LSLs in the statewide total.

### **Strengthening Support For Green Infrastructure And The Incorporation Of Green Elements Into Other Infrastructure Projects**

Green infrastructure is an eligible investment under both the CWSRF and DWSRF programs. States may use SRF funds to support projects that incorporate nature-based solutions, reduce stormwater runoff, protect source waters, enhance climate resilience, and improve water quality. The Green Project Reserve (GPR) encourages states to direct SRF assistance to these and other projects that provide certain environmental benefits. States can also prioritize/supplement set-aside funds for state-defined “green” projects.

By prioritizing GPR-qualifying projects like green stormwater infrastructure, states can advance multi-benefit solutions that reduce long-term system strain, mitigate flooding, and support healthier ecosystems, while ensuring communities—especially those facing climate-driven risks—benefit from more resilient and sustainable water management approaches.

In 2025, 8% of survey respondents made recommendations in this category. Examples of advocates' recommendations include:

- Establishing a set-aside fund that could support municipality partnerships with community-based organizations around long-term maintenance of green stormwater infrastructure (Wisconsin).

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<sup>16</sup> This variability may be explained by the states in which annual survey respondents are most active rather than a reflection of advocacy priority.

- Strengthening support for efficiency-focused projects—such as water loss mitigation and reuse—by providing additional scoring points or principal forgiveness, particularly for DACs, emphasizes the need for clearer outreach on GPR opportunities to ensure full utilization of green infrastructure and innovation funding (Texas).

### **Advocacy Actions + Impacts**

Survey responses provided examples of advocacy impacts, including:

- *Louisiana* – Advocates recommended a 10-point addition to the project prioritization system for projects that qualify as "green." This change was intended to incentivize drinking water utilities to incorporate green initiatives into their projects and enable the Louisiana Department of Health (LDH) to prioritize green project loans without needing a dedicated set-aside fund. Based on these recommendations, the Department ultimately added 5 priority points.

### **Strengthen Emerging Contaminants Programs**

IIJA provides a total of \$10 billion in funding to address ECs like PFAS, distributed through a combination of dedicated funds within the SRFs and a specific grant program for small or DACs. Of this, IIJA allocates \$4 billion to the DWSRF to assist community water utilities in addressing ECs, and \$1 billion to the CWSRF for projects addressing ECs in wastewater, stormwater, and nonpoint source pollution. These funds under the DWSRF and CWSRF programs are provided as 100% principal forgiveness or grants, and no state match is required.

In 2025, 25% of survey respondents made recommendations in this category. Examples of advocate recommendations include: adding specific criteria to prioritize funding for DACs in alignment with the goal of funding projects that address EC in underserved and DACs (Tennessee), giving clear and substantial weight to the social vulnerability index used to by the SRF agency to determine DAC status (the state's Ability To Pay Index (ATPI)<sup>17</sup>) as part of the priority ranking process for CWSRF EC projects (Tennessee), and maximizing the EC funding set-aside for technical assistance (California and Wisconsin).

### **Advocacy Actions + Impacts**

Advocates prioritized advocacy in this category across survey years. Although no specific successes were reported in the 2025 survey, this remains a priority for advocates, and future iterations of this report will continue to track progress toward achieving measurable progress as a result of advocacy efforts.

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<sup>17</sup> ATPI is Tennessee's tool for evaluating water system affordability and financial need, helping the state target SRF assistance to small, rural, or economically stressed communities.

## Future Goals

During the interviews, advocates were asked to describe their future advocacy goals for 2026. Beyond outlining specific policy recommendations (already discussed in the previous sections) to advance through IUP comments and ongoing meetings with SRF agencies, advocates identified broader, long-term goals to address systemic challenges in water infrastructure funding and financing. These goals reflect a shift from issue-specific advocacy toward strategies that strengthen the overall durability, equity, and effectiveness of SRF programs and beyond:

- Sustaining the durability of the SRF programs
- Increasing legislative engagement and funding stability
- Ensuring full utilization of IIJA funds in the final year
- Building stronger project pipelines for small and underserved communities
- Expanding transparency and understanding of fund distribution

## Sustaining the Durability of SRFs

SRFs remain at the core of long-term water infrastructure improvements, especially as IIJA annual supplemental capital grant infusions sunset in 2026. Advocates across multiple states emphasized the need to safeguard and strengthen these programs.

For example, Community Water Center (CWC) recognizes the vital importance of the SRF programs. CWC collaborates with program administrators to advocate for policy changes that better prioritize small and rural communities, especially connecting them to centralized water and wastewater utilities. When administrative changes are not possible, CWC successfully seeks legislative action, a strategy that has yielded positive results on multiple occasions and one that they will continue to pursue.

Milwaukee Water Commons also aims to secure continued investment in SRFs, noting that utilities, administrators, and community partners have collectively worked to enhance program accessibility. Their strategy centers on improving coordination between technical assistance (TA) providers and communities to help more applicants access SRF loans—an essential step for the program's long-term viability.

## Increasing Legislative Engagement and Funding Stability

Several organizations are deepening their work with state legislatures to ensure the long-term sustainability of water infrastructure funding. Texas advocates achieved a significant milestone with the passage of Proposition 4 in 2025, dedicating \$1 billion annually for 20 years to the Texas Water Fund. Their next step is to work with the Texas Water Development Board to determine whether and how these dollars may support the Clean Water and Drinking Water SRF programs.

In Wisconsin, Milwaukee Water Commons is also exploring long-term funding strategies at the state level, though the specific mechanisms are still under development. Advocates in Tennessee, Alabama, and Oregon are also beginning to consider potential strategies that are currently in the early stages of development.

SRF Forum members had an in-depth discussion on this topic and shared strategies at the [Fall 2025 Quarterly Convening](#), as this is a growing area of interest and action for the advocates.

## **Ensuring Full Utilization of IIJA Funds in the Final Year**

With the IIJA appropriations set to sunset in 2026, advocates are prioritizing efforts to ensure states fully deploy their allocated funds. This is a strategic focus to maximize the impact of IIJA investments, particularly within smaller and underserved communities.

Tennessee advocates, HC, share a similar ambition: maximizing the final years of IIJA funding by improving utility outreach and expanding the use of set-aside funds for technical assistance. One of their main goals is to develop a map of overlaying lead service line and PFAS risks to help the state prioritize outreach to small and underserved communities, to build a project pipeline to help spend down the IIJA EC and LSLR funds.

Similarly, in Louisiana, The Water Collaborative of Greater New Orleans has noted challenges in spending down EC IIJA funds within the DWSRF program due to low application rates—likely tied to limited awareness, perceived lack of need, or mistrust of government loan programs. Their goal is to collaborate with the SRF agency and utilities to identify root causes and determine necessary programmatic, statutory, or regulatory changes to build a stronger pipeline of eligible projects, ensuring full utilization of funds.

## **Building Stronger Project Pipelines for Small and Underserved Communities**

Other states are navigating different but equally pressing challenges. Alabama advocates, ARA, noted that, as of mid-2025, none of the IIJA funds for the current fiscal year had been spent. An additional concern is that while the SRF agency's primary focus is on moving money quickly to "project-ready" applicants, advocates warn this approach risks leaving behind the small and underserved utilities most in need of investment. ARA's goal for the coming year is to dedicate significant time to tracking SRF spending through its own IUP analysis, following up with the SRF agency to promote accountability, and conducting outreach to utilities to increase awareness of and participation in SRF loan programs.

Across Alabama, Tennessee, California, and Wisconsin, advocates stressed the need for SRF agencies to strengthen utility outreach so small and underserved utilities are aware of and understand available funding opportunities. Their goals include encouraging agencies to maximize set-aside funds for technical, managerial, and financial assistance and expanding TA services to

help communities develop SRF-eligible projects. Advocates in these states also plan to expand direct outreach efforts to utilities to raise awareness and build stronger project pipelines.

## Expanding Transparency and Understanding of Fund Distribution

Transparency remains a core goal for advocates in Texas, Alabama, Michigan, and Tennessee. They are seeking publicly accessible dashboards showing award decisions, bypass lists, and the share of investments reaching state-defined DACs. Advocates in Detroit noted that the absence of post-award reporting makes it difficult to determine whether investments are alleviating inequities or unintentionally reinforcing them. Improving transparency is seen as essential to ensuring that SRF dollars reach the communities that need them most and to strengthening public trust in the programs.

With the SRF, there's a real need for better data. For example, in Michigan, there's no requirement for utilities to report back to the state on how SRF dollars are actually spent once they're awarded. So there are big gaps in understanding where the money goes after the award stage. We want to see that information so we can show—and really prove—that the dollars are reaching the communities that need them most.”

- Norrel Hemphill (We the People of Detroit)

## Perceived Value of the SRF Advocates Forum

The survey results on the value of the SRF Forum reveal an overwhelmingly positive impact across all measured areas, indicating that the Forum is highly effective in supporting advocate activities. Specifically, the data shows that the Forum is strongest in building participant confidence and fostering professional connections. Specific feedback includes:

- 67% reported that participating in the Forum “significantly” increased their **confidence in advocacy**, the highest single-tier positive response across all questions.
- 75% of participants found that the Forum has **contributed to the success of their advocacy**.
- 50% of participants found that participation in or use of the SRF Forum's materials helped them **feel more connected to advocacy peers**.
- 60% of participants found that the Forum has been “extremely helpful” or “very helpful” in **supporting advocacy efforts**.

This consistent high-level positive feedback confirms the Forum's critical role in both the professional development and tangible policy success of the advocates it serves.

## Value of Connection + Learning Across State Advocacy Spaces

Another expressed value of the Forum community of practice emerged from the interviews—cross-state information sharing and learning. Cross-state learning has proven valuable in shaping policy recommendations. This learning often occurs when advocates connect through the Forum by sharing their analysis and getting feedback on it.

For example, Illinois advocates at the Metropolitan Planning Council (MPC) developed a [50-state comparative analysis](#) of TA programs, shared it with Forum members at a Quarterly Convening in 2024 for feedback, and then presented the findings to state SRF administrators along with recommendations of best practices. MPC noted that while administrators may be generally aware of other states' activities, they may not deeply engage with or implement those lessons. Thus, a focus on comparative studies can help agencies by providing practical change models and promoting the development of more effective policies that are also informed by advocates' experiences and their knowledge.

## Forum Opportunities to Address Member Needs

The Forum has played an important role in filling a capacity gap by building skills, confidence, and peer networks among SRF advocates. Most participants now report being able to actively and confidently engage with state administrators and utilities on policy and program matters, while a smaller group is still in the early stages of this work—an encouraging sign of advocacy growth and pipeline development. At the same time, advocates recognize that significant work remains, particularly as IJJA funding sunsets and attention shifts toward strengthening long-term SRF durability.

Moving forward, we (the Forum Co-conveners) will be closely monitoring progress in two key areas highlighted in this report: Maximize Utilization of Set-Asides and Increase Provision of Technical Assistance. While the 2021-2024 report recognized achievements in this category, we aim to track how and where advocates are moving state SRF program policies and administration. Workforce development emerged as a growing area of interest, appearing as a policy priority in survey responses.

We need to further explore the perceived value of preparing and submitting IUP comments. While most advocates reported that submitting comments is helpful, there was no strong indication that the action itself is highly impactful. Nevertheless, most respondents still submit IUP comments. This suggests that submitting comments may be a more impactful strategy when combined with other actions, such as follow-up meetings with SRF administrators.

Anecdotally, advocates continue to express strong demand for more structured peer connection spaces. In response, the Forum launched a regionally focused peer dialogue group call for members in U.S. EPA Region 5 and is preparing to do the same for U.S. EPA Regions 4 and 6 in 2026. Quarterly convenings remain a valuable venue for learning, troubleshooting policy

challenges, and sharing case studies on successful strategies, and we continue to explore additional formats to deepen collaboration and cross-state learning.

**In conclusion, the advocacy network is maturing, but momentum and shared spaces remain essential. Continued capacity building, peer learning, and strategic coordination will be critical to sustaining progress and preparing advocates for the post-IIJA policy landscape.**