

INDIAN HEALTH SERVICE SANITATION FACILITIES CONSTRUCTION (SFC) PROGRAM

Portland Area Indian Health Service (IHS), Division of Sanitation Facilities Construction (DSFC)

CDR Roger Hargrove, District Engineer, Olympic District Office



2023 Conference

Objectives

Provide our project stakeholders and funding partners with an understanding of:

- Overview of SFC services and support
- Sanitation System Deficiency (SDS)
- IHS Resources for O&M support and capacity development



Topics Not Covered

- IHS Housing Support Scattered Sites Projects
- IHS Special and Emergency Projects
- Interagency Agreements and Memorandums of Agreement (MOA)



Summarization of Some Topics Not Covered in Detail

- Eligibility: Basic summary: SFC funds are to provide sanitation facilities that serve the full-time residential homes of members of Tribes and Nations
- What type of sanitation facilities: Basic summary: Drinking water, sewer and solid waste
- How the projects can be delivered: Basic summary: Federal Procurement, Tribal Procurement, Title I and Title V



IHS Assistance for Tribal Infrastructure

Public Law 86-121 (July 31, 1959) – established the SFC Program to cooperatively address AI/AN community sanitation needs.

Public Law 100-713 (Nov. 23, 1988) – amended the Indian Health Care Improvements Act, expanded IHS authority to include operation and maintenance support, and required an annual report to Congress on deficiencies.

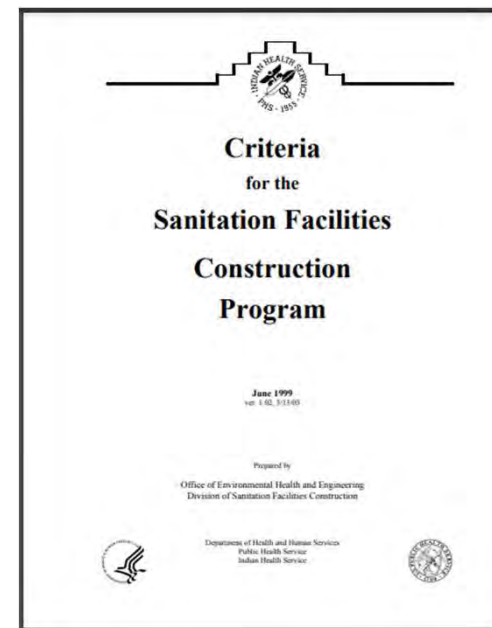
Primary Mission Activities

Identify deficiencies and develop multi-agency sanitation projects

Provide funding for water supply and waste disposal projects

Provide professional engineering design

Provide technical consultation and training to improve operation and maintenance capacity



<https://www.ihs.gov/dsfc/resources/>

Project Funding Overview

Type	Project Purpose	Area Funding Allocation By DSFC Director (HQ)
Housing	Provide adequate sanitation facilities to newly constructed and like new-homes.	Housing Priority System (HPS)
Regular	Provide adequate sanitation facilities to existing homes.	Sanitation Deficiency System (SDS)
Special	Engineering investigations, planning, and training	Project Proposal Review
Emergency	Water supply and waste disposal emergencies cause of natural disasters or other unanticipated situations.	Project Proposal Review



New: Infrastructure Investment and Jobs Act (IIJA), a.k.a. Bipartisan Infrastructure Law (BIL)

- IHS, nationally, will receive \$700M in each fiscal year from FY22 through FY26
- For a total of \$3.5B for the IHS SFC program
- These funds are available until expended
- These funds are one-time, non-recurring, and can only be used for the purposes specified in the statute
- These funds are for IHS SFC eligible costs only



IHS DSFC IIA/BIL Funding Allocation Goals

Goal 1	Allocate funds using data that follows direction of the Act.
Goal 2	Prioritize allocated funds where the majority can be used immediately to construct projects.
Goal 3	Make funding available to support planning, engineering, and design activities to get projects ready to fund including economically infeasible projects.
Goal 4	Allocation approach is easily explainable and publicly defensible.

Typical SDS and HPS Timelines

➤ SDS Projects:

- Outreach: May
- SDS Project List Submission to HQ: September
- HQ Data Review: Sept - Oct
- SDS Project List Finalized for FY23 Funding Consideration: Nov. 30th

➤ HPS Projects:

- Outreach: August/September
- HPS Project List Submission to HQ: Nov

IHS Assistance for Tribal Infrastructure

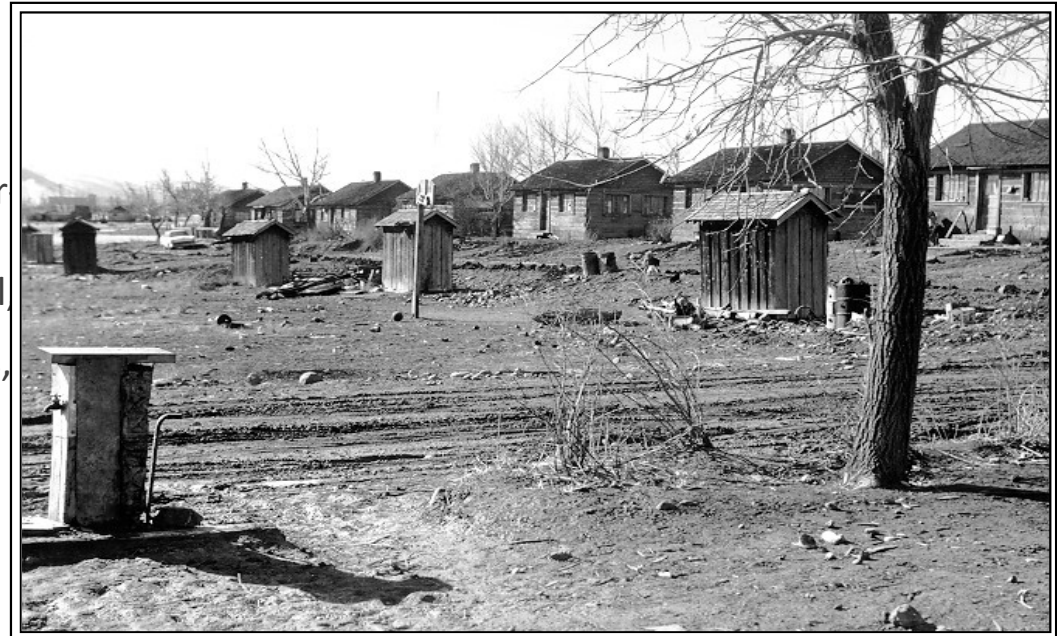
Funding Types

Regular Funds – existing homes, managed through the Sanitation Deficiency System

Homes are defined as permanent, 24-hour, year round family dwellings.

IHS does not provide funds to serve commercial, industrial, or other non-residential establishments, including health clinics, schools, and office buildings.

Projects are prioritized using a range of factors: deficiency level, health impact, cost, O&M capacity, tribal priority, contributions, previous service. – **New: IJA funds are prioritized for funding projects that were listed on the 2021 finalized SDS list**



First SFC project: Elko, Nevada 1958

Sanitation Deficiency System (SDS)

- The Sanitation Deficiency System is the SFC inventory of projects developed to address existing sanitation deficiencies in AI/AN homes and communities
- IJA/BIL funds appropriated to IHS will be allocated through SDS
- Our emphasis is working with Tribal program partners to develop Tier 2 and Tier 3 projects to Tier 1 (Ready to Fund) particularly those that were on the 2021 finalized SDS list.



Sanitation Deficiency System (SDS) – Project Tiers

- Tier 1: Project is ready to fund
 - Cost estimate +/- 10%
 - Design parameters +/- 10%
 - Unit quantities +/- 10%
 - Completed Preliminary Engineering Report (PER), environmental review, and funding sources identified
- Tier 2: Engineering Assessed
 - Cost estimate +/- 25%
 - Deficiency is understood (and documented)
 - **Recommended/Preferred solution is identified**
 - Preliminary design, environmental review, and/or funding sources still pending
- Tier 3: Preliminarily Assessed
 - Deficiency is understood (and documented)
 - Recommended/Preferred solution **has not** been identified



Interagency Preliminary Engineering Report (PER) Template

Best Practice Document developed by:

- USDA RD, Rural Utilities Service
- US EPA, Office of Water
- US HUD, Office of Community Planning and Development
- IHS, Division of Sanitation Facilities Construction

The Interagency format helps to ensure that feasible alternative solutions have been evaluated, that a preferred solution has been selected based on cost and non-cost considerations, and that the proposed solution has been developed to a sufficient design level (~15%)



INTERAGENCY MEMORANDUM

Attached is a document explaining recommended best practice for the development of Preliminary Engineering Reports in support of funding applications for development of drinking water, wastewater, stormwater, and solid waste systems.

The best practice document was developed cooperatively by:

- [US Department of Agriculture, Rural Development, Rural Utilities Service, Water and Environmental Programs](#)
- [US Environmental Protection Agency \(EPA\), Office of Water, Office of Ground Water and Drinking Water, and Office of Wastewater Management](#)
- [US Department of Housing and Urban Development \(HUD\), Office of Community Planning and Development](#)
- [US Department of Health and Human Services, Indian Health Service \(IHS\)](#)
- [Small Communities Water Infrastructure Exchange](#)

Extensive input from participating state administering agencies was also very important to the development of this document.

Federal agencies that cooperatively developed this document strongly encourage its use by funding agencies as part of the application process or project development. State administered programs are encouraged to adopt this document but are not required to do so, as it is up to a state administering agency's discretion to adopt it, based on the needs of the state administering agency.

A Preliminary Engineering Report (Report) is a planning document required by many state and federal funding agencies as part of the process of obtaining financial assistance for development of drinking water, wastewater, solid waste, and stormwater facilities. The attached Report outline details the requirements that funding agencies have adopted when a Report is required.

In general the Report should include a description of existing facilities and a description of the issues being addressed by the proposed project. It should identify alternatives, present a life cycle cost analysis of technically feasible alternatives and propose a specific course of action. The Report should also include a detailed current cost estimate of the recommended alternative. The attached outline describes these and other sections to be included in the Report.

Projects utilizing direct federal funding also require an environmental review in accordance with the National Environmental Policy Act (NEPA). The Report should indicate that environmental issues were considered as part of the engineering planning and include environmental information pertinent to engineering planning.

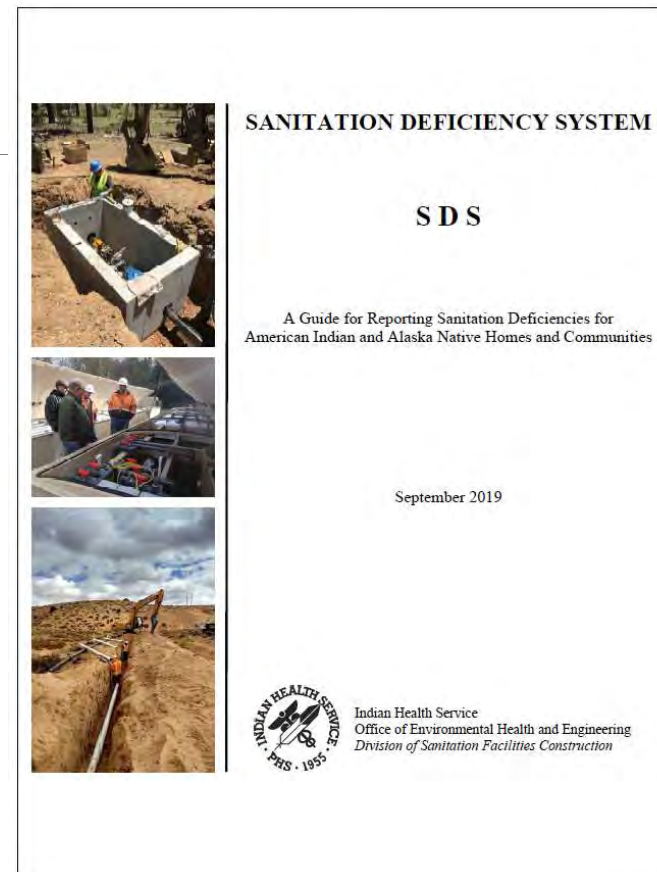
<https://www.epa.gov/tribal/infrastructure-task-force-preliminary-engineering-report>

Sanitation Deficiency System

Appendix E: Guidance on Assigning Project Impact Deficiency Levels (DLs)

SDS Scoring Criteria

Scoring Criteria	Point Assignment
Health Impact	0 to 30 points
Project Deficiency Level	0 to 25 points
Local Tribal Priority	0 to 16 points
O&M Capability	0 to 16 points
Capital Cost	-9 to 9 points
Contributions	0 to 8 points
Adequate Previous Service	0 to 4 points



<https://www.ihs.gov/dsfc/resources/>

Sanitation Deficiency System – Deficiency Levels

Appendix E: Guidance on Assigning Project Impact Deficiency Levels (DLs)

Deficiency Level	Description
5	Lacks a safe water supply and a sewage disposal system
4	Lacks a safe water supply or a sewage disposal system
3	A sanitation system which has an inadequate or partial water supply and/or sewage disposal facility that does not comply with applicable water supply or pollution control laws, or that has not solid waste disposal facilities
2	The deficiencies relate to capital improvements that are necessary to improve the facilities in order to meet the needs of such tribe or community for domestic sanitation facilities
1	The deficiencies relate to routine replacement, repair, or maintenance needs

Example Projects

- Regular Funds Projects via SDS:
 - Deficiency: Existing sewer collection system has high Inflow and Infiltration (I&I) that is causing operational issues and ability to properly treat sewer flows
 - Project: Provide construct repairs to sewer collections system to reduce I&I

- Deficiency: Community water system's water sources are not sufficient to supply community needs leading to seasonal water shortages
- Project: Construct new community water well/s and/or develop existing sources to provide sufficient water for the community



IHS Assistance for Tribal Infrastructure

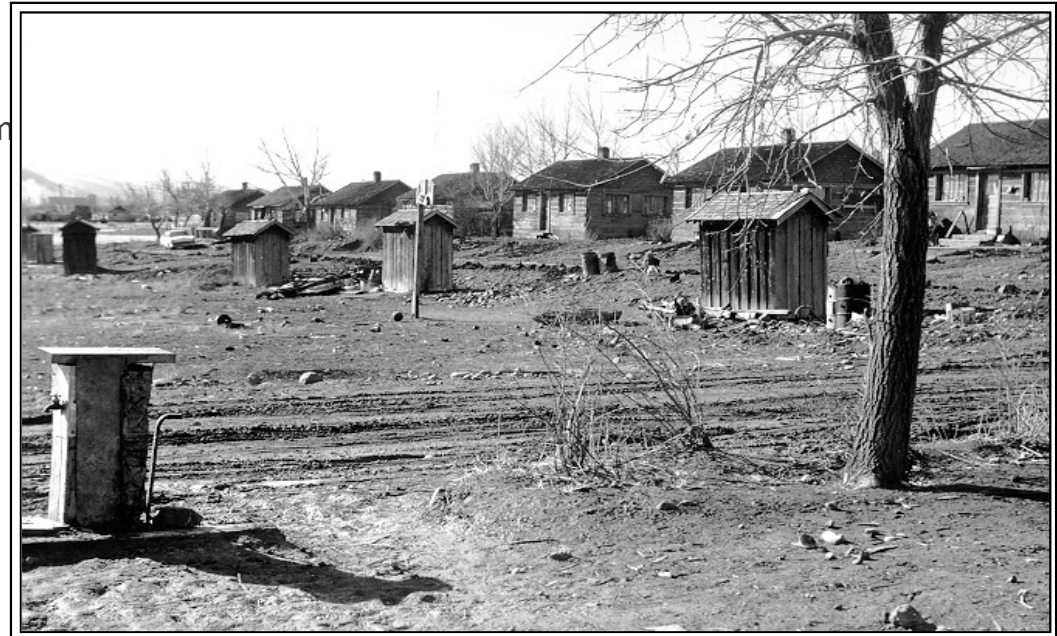
Funding Types, continued

Housing Funds – Newly constructed or like-new homes, managed through the Housing Priority System

Homes are defined as permanent, 24-hour, year-round family dwellings. May be groups of proposed new homes such as a subdivision, or individual “scattered sites”.

IHS does not provide funds to serve commercial, industrial, or other non-residential establishments, including health clinics, schools, and office buildings.

Awarded mostly on a first come first served basis but projects with advanced planning with intent to construct within one year are prioritized. – **IJA funds are not used as Housing funds.**



First SFC project: Elko, Nevada 1958

Housing Priority System (HPS)

- The Housing Priority System is the SFC inventory of projects developed to provide sanitation facilities for newly constructed AI/AN homes and communities and scattered site new/like-new homes
- IJJA/BIL funds appropriated to IHS are not used for HPS projects
- Projects may range from a few homes to a subdivision of homes
- IHS staff work with the Tribe/Nation to develop a scope and cost estimate for the work required to provide the sanitation facilities.



Example Projects

- Housing Funds Projects via HPS:
 - Tribe plans to construct new housing subdivision for Tribal members that will require addition of water and sewer facilities including water and sewer mains extensions, lift station/s and connection of homes



O&M Program Technical Assistance

- Comprehensive Sanitation Facilities Surveys
- Composite Utility Drawings (as-builts)
- Operator Training
- Specific O&M Technical Support
- Organizational Capacity Development
 - Ordinance Development
 - Budgeting
 - Rate Studies
 - Asset Inventories
 - Asset Management Planning

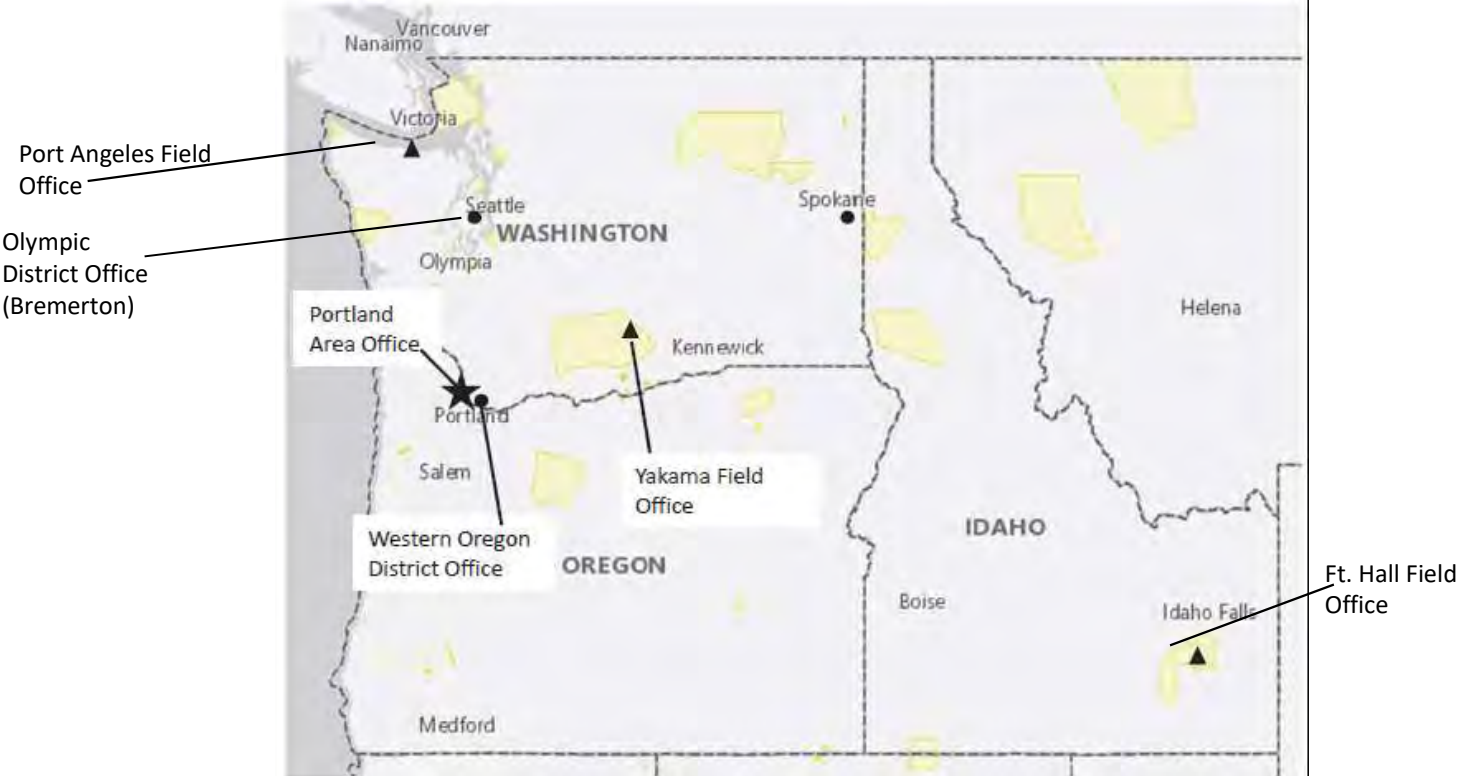


Portland Area Utility Consultants

Portland Area District/Tribal utility consultants enhance operations and maintenance of tribal public water, wastewater, and solid waste systems to ensure safe drinking water, proper waste disposal, and public health for American Indians in Washington, Oregon, and Idaho.



Portland Area DSFC Offices



IHS Assistance for Tribal Infrastructure

Area Contacts

CAPT Alex Dailey, P.E.
Director, Portland Area DSFC
503-414-7780
alexander.dailey@ihs.gov

CDR Ben Chadwick, P.E.
Deputy Director, Portland Area DSFC
503-414-7772
benjamin.chadwick@ihs.gov

District Contacts

Spokane District – Spokane, WA
CDR Ben Chadwick, P.E. (Acting D.E.)
503-414-7772
benjamin.chadwick@ihs.gov

Olympic District – Bremerton, WA
CDR Roger Hargrove, P.E.
360-536-0096
roger.hargrove@ihs.gov

Western Oregon District – Portland, OR
LCDR Patrick Fox, P.E.
503-414-7786
patrick.fox@ihs.gov



IHS Assistance for Tribal Infrastructure

Field Office Managers:

- Yakama Field Office: Michael Blasy, P.E., 509-865-1775, michael.blasy@ihs.gov
- Port Angeles Field Office: Vacant
- Fort Hall Field Office: LCDR Matthew Chadwick, P.E., (208) 238-5473, matthew.chadwick@ihs.gov

Tribal Utility Consultants:

- Ladd Folster, Spokane District Office, (509) 455-3522, laddie.folster@ihs.gov
- LCDR Sandy Redsteer, Olympic District Office, (360) 792-6483, sandy.redsteer@ihs.gov
- LCDR Jason Davis, Portland Area Office, (503) 414-7787, Jason.davis@ihs.gov



Thank you!



IACC
INFRASTRUCTURE ASSISTANCE
COORDINATING COUNCIL

2023 Conference