



## OFFICE OF WATER

WASHINGTON, D.C. 20460

### **MEMORANDUM**

**SUBJECT:** Fiscal Year 2025 Allotments of Clean Water Indian Set-Aside Base and Infrastructure Investment and Jobs Act Program Funding

**FROM:** Raffael Stein, Director  
Water Infrastructure Division  
Office of Wastewater Management

**TO:** Water Division Directors, Regions I-X  
Regional Clean Water Tribal Set-Aside Coordinators

This memorandum provides fiscal year 2025 Clean Water Indian Set-Aside (CWISA) program final allotments of \$89,337,000 appropriated through the Infrastructure Investment and Jobs Act (P.L. 117-58) as well as Base program funds appropriated under the Full Year Continuing Appropriations and Extensions Act, 2025 (P.L. 119-4). The IIJA budget provided \$52,060,000 to CWISA for wastewater infrastructure and \$4,500,000 to address Emerging Contaminants (EC). The FY25 appropriations provided \$32,777,000 in Base CWISA funding.

This memorandum allocates FY 2025 CWISA program funding to EPA regions and accompanies the project priority Sanitation Deficiency System (SDS) lists provided to EPA by the Indian Health Service (IHS).

The CWISA program will continue to accelerate the implementation of long-term solutions to some of the most significant wastewater infrastructure challenges facing American Indian Tribes and Alaska Native Villages. The [working relationship among EPA and the Tribal Infrastructure Task Force \(ITF\)](#), including IHS, is integral to addressing these significant Tribal wastewater infrastructure challenges now and into the future. Regions are encouraged to seek co-funding opportunities with IHS, and to expand areas of collaboration and efficiencies with IHS. Given the need for close collaboration to support Tribes continues to be significant, Regions are encouraged to establish frequent and consistent communications with Tribes and ITF partner agencies to ensure an efficient and coordinated federal response.

Thank you for your continued leadership and the extensive work of your staff as the EPA and Tribes continue to make great strides toward the delivery of wastewater infrastructure services for Tribal communities. If you have any questions concerning the contents of the CWISA components of this memorandum, you may contact Matthew Richardson ([richardson.matthew@epa.gov](mailto:richardson.matthew@epa.gov)) or Rory Hytrek ([hytrek.rory@epa.gov](mailto:hytrek.rory@epa.gov)).

**Attachments:**

- Attachment A FY 2025 CWISA Allotments
- Attachment B FY 2025 CWISA-EC Allotments
- Attachment C FY 2025 CWISA Allotment Policies

**Cc:**

- Andrew D. Sawyers, Wynne Miller, Veronica Blette, Catherine Allen, Lenny Bankester, Karen Somerville, OWM
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- Joanne Hogan, Meghan Kelley, OGC
- Ed Walsh, OCFO
- Melissa Wise, James Tyree OGD
- Mark Calkins, Director, Division of Sanitation Facilities Construction, IHS

**Attachment A**  
**FY 2025 CWISA Allotments**

IHS Area	EPA Region(s)	Sewer Need *	Percent of Total Need	IIJA***	Base	Total
Albuquerque	6 & 8	\$33,231,989	8.64%	\$4,498,000	\$2,832,000	\$7,330,000
Anchorage	10	\$106,108,093	27.59%	\$14,360,000	\$9,040,000	\$23,400,000
Bemidji	5	\$25,321,790	6.58%	\$3,427,000	\$2,158,000	\$5,585,000
Billings	8	\$15,723,642	4.09%	\$2,128,000	\$1,340,000	\$3,468,000
California	9	\$12,699,025	3.30%	\$1,719,000	\$1,082,000	\$2,801,000
Great Plains	7 & 8	\$33,992,340	8.84%	\$4,601,000	\$2,897,000	\$7,498,000
Navajo	9	\$61,717,959	16.05%	\$8,353,000	\$5,259,000	\$13,612,000
Nashville	1, 2, 3, 4 & 6	\$2,047,987	0.53%	\$277,000	\$175,000	\$452,000
Oklahoma	6 & 7	\$28,739,896	7.47%	\$3,890,000	\$2,449,000	\$6,339,000
Phoenix	8 & 9	\$34,570,741	8.99%	\$4,679,000	\$2,946,000	\$7,625,000
Portland	10	\$29,746,072	7.73%	\$4,026,000	\$2,535,000	\$6,561,000
Tucson	9	\$752,000	0.20%	\$102,000	\$64,000	\$166,000
<b>Infrastructure</b>		<b>\$384,651,534</b>	<b>100.00%</b>	<b>\$52,060,000</b>	<b>\$32,777,000</b>	<b>\$84,837,000</b>
<b>EC</b>	<b>All**</b>			<b>\$4,500,000</b>		<b>\$4,500,000</b>
<b>FY25 Total</b>				<b>\$56,560,000</b>	<b>\$32,777,000</b>	<b>\$89,337,000</b>
* Sewer need based on IHS SDS feasible need from IHS Systemwide HQ #20118 (11/19/2024)						
**EC allocations and policies described below						
***IIJA allotment numbers parallel preliminary FY25 IIJA allotment memo (12/20/24) numbers						

**Attachment B**  
**FY 2025 CWISA-EC Allotments**

The FY 2025 CWISA-EC funding allocations for the EPA Regions are described below. To help Regions identify Tribal projects that may be eligible for BIL CWISA-EC funding, EPA released the [CWISA Emerging Contaminant Funding Eligibility](#) Summary document, and the [CWISA Emerging Contaminants Project Eligibility Decision Tool](#), accessible at the [Clean Water Indian Set-Aside website](#).

While similar, CWISA-EC eligibilities are in some cases distinct and more broad than the [Clean Water State Revolving Fund Emerging Contaminants](#) (CWSRF-EC) eligibilities. Therefore, Regions are encouraged to review the Eligibility Summary and contact Headquarters with any questions. Additionally, several case studies highlighting emerging contaminants projects can be found on the EPA [CWSRF Emerging Contaminants website](#). Regions should continue administering CWISA-EC funding using the CWISA and CWISA-EC program guidance and Regions are asked to continue tracking CWISA-EC projects within TDINex regularly.

The CWISA-EC allocations described herein are based on the previously distributed memorandum from EPA's Office of Water to the Regional Water Division Directors: dated February 1, 2024, *Clean Water Indian Set-Aside – Emerging Contaminants Program Guidance*. The memorandum articulated that each EPA Region's CWISA-EC funding distribution is calculated by the percent of CWISA infrastructure funds distributed to each Region in the past five years. That memorandum also articulated that CWISA-EC projects, unlike projects funded by CWISA, do not need to be identified in the IHS SDS. If you have any CWISA-EC questions, you may contact Jake Adler ([adler.jacob@epa.gov](mailto:adler.jacob@epa.gov)).

EPA Region	Percent of CWISA Distribution FY18-22	FY25 CWISA-EC Total
1	0.80%	\$35,000
2	1.10%	\$48,000
3	0.00%	\$0
4	0.10%	\$4,000
5	6.50%	\$292,000
6	8.30%	\$374,000
7	0.90%	\$41,000
8	15.40%	\$695,000
9	34.40%	\$1,546,000
10	32.60%	\$1,465,000
<b>Total</b>	<b>100.00%</b>	<b>\$4,500,000</b>

## **Attachment C**

### **FY 2025 CWISA Allotment Policies**

EPA's Office of Water is distributing the CWISA funds using the existing allocation procedures described in EPA's CWISA Program Guidance. The amount of CWISA funding available to an EPA Region is based on its percentage of tribal wastewater (sewer) needs identified in the IHS Sanitary Deficiency System (SDS) database for each of the 12 IHS areas.

The IHS SDS database maintains an inventory of sanitation deficiencies and projects to address those deficiencies for new and existing Indian homes and communities. As described in the CWISA Guidance, Regions are to identify projects based on the IHS SDS priority lists. The 24 SDS lists were provided electronically on November 27, 2024, are posted on the Tribal Water Infrastructure Funding Network (TWIFN)<sup>1</sup> sharepoint site and are available upon request. Regions are to also consult the previously provided "Information Requirements for Implementing the Clean Water Indian Set-Aside Program Guidance Summary" which identifies the project level details to be provided by each Region such that funds may be reprogrammed to each Region.

Further CWISA information including eligibility requirements and the CWISA Program Guidelines (2015, amended 2025) can be found at the [CWISA Program](#) website. [EPA HQ and Regional contacts](#) will continue to administer the CWISA funding in close cooperation with the IHS Division of Sanitation Facilities Construction Program.

The IHS Sanitation Deficiency System (SDS) database maintains an inventory of sanitation projects to address deficiencies for new and existing Indian homes and communities. As described in the 2015 CWISA Guidance, Regions are to identify projects based on the IHS SDS priority lists.

EPA Regions should obligate funds under Interagency Agreements or direct grants by September 30, 2025, or the funds could be subject to Congressional rescission. Furthermore, funds that are not obligated under an Interagency Agreement or a direct grant by September 30, 2026, could be reallocated to a different EPA Region. The Office of Mission Support (OMS), Office of Grants and Debarment (OGD) Interagency Agreement Shared Service Center (IASSC) requests that all FY 2025 funded Interagency Agreements (IAs) with IHS be submitted prior to late July 2025. Any Interagency Agreement (IA) packages submitted after September 30, 2025, will not be processed without a Special Handling Memo from the regional Project Officer's (PO's) Senior Resource Official (SRO).

After EPA Regions have consulted with the appropriate parties and identified projects, they are to submit to EPA headquarters key information for each project. The information is identified below and is requested within two months of issuance of this guidance to meet either your Region's award deadlines, or the IASSC deadline:

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<sup>1</sup> TWIFN: <https://usepa.sharepoint.com/:f:/r/sites/TribalandDirectimplementation/Shared%20Documents/TWIFN%20-Tribal%20Water%20Infrastructure%20Funding%20Network?csf=1&web=1&e=HfcGQB>

1. Project name,
2. Project description,
3. Tribe/Alaskan Native Village name,
4. IHS area name,
5. IHS SDS number,
6. SDS priority number,
7. Amount of CWISA funds requested,
8. Total project cost,
9. Number of homes served by the project,
10. Funds to be distributed through a direct grant with a tribe or an IA with IHS, and
11. Project type (piping, treatment, onsite, planning, etc.).

The funds will be accessible to each Region once this information is received and reviewed by headquarters staff. Once the projects are funded the CWISA coordinator will also require the EPA grant or IA number and the IHS Project Data System (PDS) number (if awarded through an IA with IHS).

EPA headquarters collects and summarizes CWISA data related to: (1) program performance, (2) fund expenditures and utilization, and (3) inter-agency coordination and collaboration. In support of the above, Regions are expected to provide CWISA data on a regular and as needed basis. This may require regional coordinators to track individual project details. Once the projects are funded, Regions are asked to populate the Tribal Direct Implementation Nexus (TDI Nex) system in a timely manner.

For those Regions considering the transfer of funds between CWISA and the DWIG-TSA programs, please contact headquarters staff.

Section 608 of the Clean Water Act and Section 1452(a)(4) of the Safe Drinking Water Act also have provisions concerning use of iron and steel made in the United States. This does not apply to CWISA funding because the tribes receive these funds as grants, or through IAs, and the funds are not put into a revolving loan fund. However, if a project utilizes both CWISA and State Revolving Loan (SRF) funds, American Iron and Steel provisions must be incorporated into all project contracts regardless of funding source consistent with Federal law. For projects managed through an IA with IHS, IHS's iron and steel policies apply.

EPA's Disadvantaged Business Enterprise (DBE) program requirements for procurement activities under assistance agreements are described in EPA's regulations at 40 CFR Part 33. As of April 2025, there have been changes to the implementation of this section. Please refer to [this notice](#) for direction. Future updates may be accessed [here](#)."

**Term and Condition:** The Office of Grants and Debarment (OGD) has revised the existing General Term and Condition, "Utilization of Disadvantaged Business Enterprises". The term and condition is applicable to all recipients and supersedes all previously existing DBE terms and conditions.