

August 6, 2026

Nicole N. Murley
Deputy Inspector General
OIG.PublicAffairs@epa.gov

RE: Audit of Environmental Finance Centers Providing Water Infrastructure Technical Assistance in EPA Region 4 - Report No. 26-P-0026

Dear Ms. Murley,

The Southeast Sustainability Directors Network (SSDN) is in receipt of the U.S. Environmental Protection Agency Office of Inspector General's (OIG) [Audit of Environmental Finance Centers Providing Water Infrastructure Technical Assistance in EPA Region 4](#) (Report No. 26-P-0026) and your letter dated July 7, 2026. We appreciate the opportunity to review and comment.

The information contained in the report as it pertains to SSDN appears to be an accurate depiction of the successes and challenges experienced by SSDN's Multi-Environmental Media Environmental Finance Center (SSDN's EFC) in its first year of operation.

SSDN broadly supports the recommendations of the OIG, and wishes to share the following clarifications, and responses to the recommendations and corrective action responses.

Clarifications:

Chapter 2, pg 13

"Some EFCs had to shift their priorities and adjust their community outreach efforts. For example, the Southeast Sustainability Directors Network, or SSDN, reported that its priorities switched from providing direct TA to communities to setting up webinars and training sessions on federal funding opportunities to local government or utility participants across Region 4."

- SSDN did not switch priorities away from providing direct TA. SSDN's priority to provide direct TA remained consistent, but our strategies to provide direct TA shifted, to look for ways to scale

outreach efforts that drive TA requests more economically, which meant webinars, in-person events and other methods.

Recommendation Responses:

Recommendation	Corrective Action	SSDN's Response
1. Assess and implement solutions that address challenges limiting community access to Environmental Finance Center-provided technical assistance, specifically challenges related to capacity, community awareness, and the EPA's management and support of the program. We make this recommendation to increase the number of communities receiving technical assistance which have not previously accessed water infrastructure technical assistance and federal funding programs, such as the Drinking Water and Clean Water State Revolving Fund Programs.	The EPA concurs with this recommendation and is already taking steps to increase the number of communities receiving technical assistance which have not previously accessed water TA and federal funding programs, both in Region 4 and nationally. This has been done through: 1. Outreach and engagement to promote the Water TA Request form. 2. Ongoing Project Officer meetings with national and regional EFCs to provide guidance and document success stories. 3. National EFC convening to facilitate sharing best practices and innovative ideas for finding communities and providing TA. The increases in numbers will be reflected in the EFC reporting metrics and internal tracking maintained by the EPA Office of Water.	SSDN was unaware of the national EFC convening and is interested in participating in future events.
2. Work with the Environmental Finance Centers to improve the geographic distribution of technical assistance provided in EPA Region 4.	2. OW has conferred with Region 4 and they will host a meeting with each state where each EFC can present on their capabilities and hear from the state about their priorities for WaterTA.	SSDN looks forward to participating in these meetings. It will improve communication and coordination across the program and increase awareness of the state revolving fund programs.

Recommendation	Corrective Action	SSDN's Response
3. Adopt documentation standards, like the EPA Office of Water's quarterly performance review checklist, to better evaluate and document progress made under the cooperative agreements by the entities funded as Environmental Finance Centers. This will allow the region and the Office of Water to better understand the accomplishments made by the Environmental Finance Center program.	Region 4 concurs with this recommendation and will adopt documentation standards for evaluating and documenting progress made under assistance agreements (specifically cooperative agreements).	SSDN previously received little guidance on the content and structure of the performance reports. We welcome standardized practices, however we advocate for concise standards and streamlined procedures to avoid an increased and onerous reporting burden.

SSDN explicitly requests that this response be included with the OIG Audit Report whenever and wherever it is published.

Respectfully,

Rob Phocas

Rob Phocas,
Executive Director
Southeast Sustainability Directors Network

Audit trail

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FILE NAME EPA OIG Letter 8_2026 - 8/6/26, 3:17 PM

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