

APPENDIX B

Annual Review Checklist

Use of these Checklists

The checklists that follow are designed to provide a convenient method for ensuring that the annual review has addressed all of the major review elements.

The checklists are organized by topic for easy reference and do not represent a suggested order for conducting the review. For example, project file reviews may touch on many different annual review topics and the checklists provide a mechanism to quickly locate the topic and record the findings while moving from one topic to another. Once the review is completed, all of the topics must either be specifically addressed or noted as not being covered during this review. If an area was not reviewed, note the reason for not reviewing it and any future review activities.

For the items that are reviewed, the requested information on the checklist must be completed noting your findings. Pertinent attachments should be added to the checklists and referred to as is appropriate. The checklists must be used as your work papers for the overall evaluation and a reference document in the future to prepare for the next annual review.

It should be noted that the checklist topics are references and are not intended to be comprehensive statements of each program item. Other supporting documents, such as the Annual Review Guidance, program documents provided in the SRF Document Library, the SRF Audit Compliance Supplement, the EPA SRF Financial Planning Model, and many other SRF related information and tools should be utilized to delve in depth into specific review topics.

Some questions in the checklist pertain to State activities that may not change from year to year. To create a baseline review record, all of these questions must be completed once with detailed answers. Once the reviewer has a good understanding of the State's process, in subsequent reviews the reviewer may rephrase these questions to ask "*Have there been any updates or changes to [the review topic]?*" If no updates or changes have occurred, the reviewer should complete the checklist item using knowledge gained from past reviews and discussions with the State. Reviewers must complete every question on the checklist, but should use their best judgement to rephrase questions as necessary to make the discussion relevant and useful.

The questions on the checklist have been phrased so that any checkbox in the "No" column indicates an item that may require follow-up from the Region and potential inclusion in the PER. This is done so that the reviewer may quickly scan the checklist to identify potential problem areas.

Annual Review Checklist
Programmatic Section

A	B	C	D	E	F	G	H	I	J	
1										
2	ADVANCE PREPARATION									
3	<p>This section is intended to be completed by the reviewer prior to the onsite Annual Review. The items should be completed based on a review of the State's documents (IUP, Operating Agreement, Annual Report, SERP, Single and Independent Audit) and reports (CBR/PBR, NIMS, FFATA). The reviewer may also rely on knowledge and information gained from recent conversations with the State. The reviewer should make all efforts to complete this section in advance of the onsite Annual Review to allow limited onsite time to be spent on substantive discussions of SRF management and oversight. Reviewers should use knowledge gained from completing the Advance Preparation worksheet to inform and guide the discussions during the onsite Annual Review interviews.</p>									
4										
5	State / Program / Review Year:				Reviewer's Name:					
6	Review Item and Questions to Answer			Yes	No	N/A	Notes			
7										
8	<p>A.1 Regional Preparation Action Items (Project Officer and/or Financial Analyst) <i>Sources: 40 CFR §35.3130, §35.3135, §35.3140, §35.3150, §35.3545, §35.3550, §35.3555, §35.3575, and §35.3580</i> <i>The Project Officer or regional representative who will be onsite should review the state's documents and become familiar with all current processes and procedures, including the IUP, Annual Report, SERP, OA, and other state guidance documents or SOPs. The financial analyst who will be onsite should review, as relevant, all state financial documents including bond documents, COMPASS/NIMS reports, and independent and Single audits</i></p>									
9	1	Please provide the date of submittal (for IUP & Annual Report) or date of last update (for OA, SERP, and financial documents) in the notes for the following documents:								
10		a. Intended Use Plan & Project Priority List							_____	
11		b. Annual Report							_____	
12		c. Operating Agreement							_____	
13		d. State Environmental Review Procedures							_____ →	
14		e. Most recent independent and Single audit (if applicable)							_____	
15		f. Most recent bond documentation (if applicable)							_____	
16	2	Please list in the notes any areas of concern identified by the Project Officer or Financial Analyst that will be addressed during the onsite review (e.g., High ULO levels, difficulty meeting stated program goals, etc.)							_____	
17										
18	<p>A.2 Implementing Federal Requirements <i>Sources: SRF-14-01, EPA Regulations, 40 C.F.R. Part 33, EPA Crosscutter Policy Memo, Nov 5 2013, Capitalization Grant Conditions, EPA Signage Policy Memo, Final WRRDA Guidance of January 6, 2015, EPA American Iron & Steel Policy Memo, Mar 20 2014, Implementation of DWSRF-Related SDWA Amendments in the WIIN Act Memo (June 6, 2017), America's Water Infrastructure Act of 2018 amendments to SDWA</i></p>									
19	1	Did the state identify in the Annual Report which loans met all equivalency requirements? And did the state apply all equivalency requirements to the same group of loans? (SRF-14-01)								

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7										
20	a. FFATA Compliance			Yes	_____	_____				
21	b. DBE			Yes	_____	_____				
22	c. Federal crosscutter requirements			Yes	_____	_____	For all borrowers of the DWSRF			
23	d. EPA Signage Requirements			Yes	_____	_____				
24	e. A&E Procurement [CW only]			_____	_____	N/A				
	2 The Project Officer should send an email to the Grants Specialist (GS) and Grants Management Officer (GMO) requesting a response to the following questions. The GS and/or GMO should respond within one week. A negative response to the questions will require the State to work with the GS on a resolution.									
25										
26	a. Has the State submitted timely DBE reports for all open SRF grants? Are any missing?			Yes	_____	_____				
	b. Does the State have final or provisional negotiated rate agreements that span the budget periods of all open SRF grants? Note: The State is required to maintain a current rate throughout the life of the assistance agreement.			Yes	_____	_____				
27										
	c. Is the State submitting the 2 CFR 200 (formerly A-133) State-wide Single Audit Report in a timely manner? Are any missing?			Yes	_____	_____				
28										
29										
	A.3 Operating Agreement									
	Source: CWSRF Regulations 40 C.F.R. §35.3130(b), DWSRF Regulations 40 C.F.R. §35.3545(c), Federal Water Pollution Control Act (FWPCA), Safe Drinking Water Act (SDWA)									
30										
	1 Based on your knowledge of the State's program, does the OA reflect all current procedures and processes, for example: use of bonds for leveraging/state match, nonpoint source sponsorships, linked-deposit, Programmatic Financing, WIIN/AWIA updates, other significant program changes, and the Federal requirements listed below?									
31										
32	a. [CW ONLY] A&E services procurement requirement, FWPCA Section 602(b)(14)			_____	_____	_____				
33	b. [CW ONLY] Fiscal Sustainability Plans, FWPCA Section 603(d)(1)(E)			_____	_____	_____				
34	c. [CW ONLY] Cost & Effectiveness, FWPCA Section 602(b)(13)			_____	_____	_____				
	d. American Iron and Steel (CW: FWPCA Section 608 - applies to all treatment works projects; DW: SDWA 1452(a)(4) - applies to all public water system projects)			_____	_____	_____				
35										

** Recently updated FY22

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5	State / Program / Review Year:				Reviewer's Name:					
6	Review Item and Questions to Answer			Yes	No	N/A	Notes			
7										
36	e. Build America Buy America Act (BABA) (applies to all equivalency projects)									
37	f. Signage grant condition									
38	g. Davis-Bacon (CW: applies to all treatment works projects; DW: applies to all assistance agreements)									
39	h. [CW ONLY] Affordability Criteria, FWPCA Section 603(i)(2)									
40	i. [DW ONLY] Disadvantaged Community Program per AWIA (begins with FY19 Capitalization Grant)									
41	j. State Environmental Review Process (SERP)									
42										
43	<p>A.4 Green Project Reserve Requirements <i>Source: FY19 Continuing Appropriations Act, SRF-13-03</i></p>									
44	1 [CW only] Review Annual Report data for GPR projects with loans closed during the year under review. From the project descriptions provided, do the projects appear to be eligible GPR projects?									
45	a. [CW only] Are the projects reported in the correct GPR category?			---	---	N/A	---			
46	b. [CW only] Has the State met the GPR requirement for the year under review?*			---	---	N/A	---			
47	2 [DW only] Does the state have a "green" program? (GPR is discretionary for DWSRF post-2011 program years)									
48	a. If so, what types of projects are they funding?			---	→	N/A	---			
49	b. If so, are the projects reported in PBR? In the correct GPR category?			---	---	---	---			
50										
51	* The EPA Green Infrastructure Policy for the Clean Water State Revolving Funds dated January 6, 2016, the Green Project Reserve Policy for waivers dated December 22, 2011 and the Questions and Answers on the Additional Subsidization and Green Project Reserve Provisions dated August 19, 2013 clarify that the GPR requirement for a given year's appropriation is met when the minimum									
52	GPR funds required are in executed assistance agreements. These documents also clarify that states have two years to enter into an assistance agreement for GPR projects identified in the Intended									
53	Use Plan. If a project has not signed a loan agreement by the end of the second fiscal year, the State must include an explanation in the Annual Report along with anticipated milestones, and must									
54	meet those milestones by the end of the third fiscal year.									
55										
56										
57	<p>A.5 SRF Administration <i>Source: Final WRRDA Guidance of January 6, 2015, America's Water Infrastructure Act of 2018 amendments to SDWA, Implementation of DWSRF-Related SDWA Amendments in the WIIN Act Memo (June 6, 2017)</i></p>				<p align="center">Fees supplement salaries and tribal activities</p>					

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5	State / Program / Review Year:				Reviewer's Name:				
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7									
58	1	Is the State using SRF administrative funds to administer the SRF program?		Yes	_____	_____	<p>** See IUP - for amount, 1/5 the valuation of the fund - total expenditures in annual report are approx \$884k; need documents for additional charges</p>		
59		a. If so, is the amount used within the allowable amount? (Allowable amount is defined as the maximum of 4% allowance, \$400,000, or 1/5% of Fund balance.)		_____	_____	_____			
60	2	Are the State's administrative charges within the allowable amount for the year?		Yes	_____	_____			
61									
62	<p>A.6 Compliance with Environmental Review Requirements Sources: CWSRF Regulations, 40 C.F.R §35.3140; NEPA Regulations 40 C.F.R. Part 6; DWSRF Regulations, 40 C.F.R §35.3580</p>								
63	1	Has the Project Officer received a current copy of the State's environmental review process and compared processes described in the SERP to other state program documents and past Annual Review materials, and through discussions with the State, to be able to determine that the State is following the SERP during project file review?		_____	_____	_____			
64	2	Does the SERP provide an accurate and complete summary of the State's process and documentation requirements for issuing the following:		_____	_____	_____			
65		a. Categorical Exclusion (CE) or the State equivalent?		_____	_____	_____			
66		b. Environmental Assessment (EA)/Findings of No Significant Impacts (FONSI) or the state equivalent?		_____	_____	_____			
67		c. Environmental Impact Statement (EIS)/Records of Decisions (ROD) or the State equivalent?		_____	_____	_____			
68									
69	<p>A.7 Short and Long-Term Goals</p>								
70	1	Is the state making progress toward achieving their short and long term goals listed in their IUP for the review year? Do any goals need to be updated or revised?		_____	_____	_____	<p>Yes. No updates needed at this time. Progress on a selection of the program's goals is detailed in the PER.</p>		
71				_____	_____	_____			
72	<p>A.8 Reporting Source: EPA Grant Terms and Conditions</p>								
73	1	Has the State entered data for all projects in the Annual Report into the SRF database?		Yes	_____	_____			

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7										
74	a. Are the records complete, to the extent possible?			Yes						
75	2 Has FFATA data been entered into fdrs.gov for projects in an amount equal to the capitalization grant? (note: the Regional Grants Office may be able to provide a copy)			Yes						
76										
77	<p>A.9 Assistance Terms Sources: Final WRRDA Guidance of January 6, 2015, most recent SRF appropriations act , America's Water Infrastructure Act of 2018 amendments to SDWA, WRRDA amendments to FWPCA</p>									
78	1 Does the CW program offer 30-year financing? Does the DW program offer 40-year financing for Disadvantaged Communities?			Yes						
79	2 Are assistance terms based on the useful/design life of the project?			Yes						
80	3 Has the state received EPA approval for extended term financing, and if so, have they been complying with any conditions of the approval (for instance, Annual Report updates)? (Note: extended term financing is more than 30 years for CWSRF and DWSRF non-disadvantaged communities, or more than 40 years for DWSRF disadvantaged communities)					N/A				
81	4 What are the criteria for providing additional subsidy?				→		** IUP Additional Subsidy criteria**			
82	5 Is the amount and type of additional subsidy provided by the State consistent with the additional subsidy amount required by the appropriation for the year under review? (Record type and amount in the Notes column)			Yes						
83	6 Is the state also allocating the additional subsidy allowed under FWPCA (CW) and required under SDWA (DW)? (if yes, record amount in the Notes column)			Yes			**IUP			
84	a. Is the state staying under the maximum amount of additional subsidy allowed under FWPCA (CW) and required under SDWA (DW)?			Yes						
85	b. [CW only] Is the state's affordability criteria for additional subsidy in compliance with FWPCA?									
86	c. [CW only] When awarding additional subsidy is the state following its affordability criteria and/or WRRDA guidance?									

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7										
87	7	Is additional subsidy only provided to recipients and projects that are eligible to receive it?			Yes	_____	_____	A status of disbursed subsidy is provided in the annual report		
88	8	Does the Annual Report include status and milestones for committing additional subsidy to loans?			Yes	_____	_____			
89	<p>A.10 Use of Fees Sources: Final WRRDA Guidance of January 6, 2015, 40 CFR Part 35 Guidance on Fees Charged by States to Recipients of Clean Water State Revolving Fund Program Assistance, DWSRF Regulations, 40 C.F.R §35.3530</p>									
90	1	If the State assesses fees on assistance, note the fee rate charged and on what basis (e.g., percentage of closing amount, principal outstanding, principal repaid, etc.) in the Notes column (if the State does not assess fees, note "N/A" in the Notes column)						→ ** 5% of total loan fee as part loan interest repayment		
91	a.	Describe how fee income is used by the program. For each use, indicate whether the fee income is program or non-program income.								
92										
93	2	What are the State's procedures for accounting and reporting fee use?								
94										
95	<p>A.11 State Match (Sources: 40 CFR Part 35: State Revolving Fund Implementation Regulations, EPA Standard Operating Procedure 2.3: Reviewing Use of Bonds for State Match and Leveraging)</p>									
96	1	What is the state's source of match?						→		
97	a.	If this is a different source than the state has used in the past, briefly describe any changes								
98	2	If bonds are issued for state match, and the SRF is used to retire these bonds, do the bond documents clearly state what funds are being used for debt service and security?								
99	a.	Has the State's current match bond structure been approved by EPA Headquarters?								
100										
101	<p>A.12 Timely and Expeditious Use of Funds Sources: 40 CFR §35.3135(d), SRF-99-05, SRF-99-09, 40 CFR § 35.3550(I); DWSRF-14-02</p>									

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5	State / Program / Review Year:				Reviewer's Name:					
6										
7	Review Item and Questions to Answer			Yes	No	N/A	Notes			
102	1 Review the State's balance of uncommitted funds (all sources) for the SFY under review, using the SRF datasystem, annual audits, and the annual report. Compare it to at least the last two years. Is the balance of uncommitted funds increasing or decreasing?						Decreasing **			
103	2 Review the State's balance of unliquidated federal funds for the current year, using Compass Data Warehouse. Compare it to at least the last two years. Is the State's balance of unliquidated federal funds acceptable or declining?									
104	a. [DW Only] Are unliquidated obligations increasing or decreasing, and are these balances consistent with the DWSRF ULO Reduction Policy issued April 14, 2014?						Decreasing - Approx \$12M 05/09/2023			
105	3 Review the State's balance of non-federal cash or cash equivalents for the current year, using the annual financial statement audit or deriving from SRF datasystem. Compare it to at least the last two years. Does the State appear to be building up cash? If so, explain.									
106	4 In reviewing the IUP, Annual Report and other financial data do you conclude:									
107	a. The state SRF is committing all funds as efficiently as possible and in a timely and expeditious manner (within 1 year of receipt). If not, what specific issues do you identify?									
108	b. The state SRF expeditiously commits available funds to ready to proceed projects. If not, what specific issues do you identify?						Yes			
109	c. These projects move to construction in an efficient and timely manner. If not, what specific issues do you identify?									
110	d. Construction is completed and project funds are disbursed in an efficient, timely and expeditious manner. If not, what specific issues do you identify?									
111	e. Are there any uncommitted fund balances? If so, what are these balances and what is the reason they remain uncommitted? Are the issues captured in the HQ state policy matrix?						** Uncommitted decreasing \$39M			
112	f. [DW Only] Did the state shift set-aside funds to the loan funds after a certain period of time? If so, after what period of time?						No			

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7										
113	5 After reviewing the trend analysis, is the State using its funds, from all sources, in a timely and expeditious manner?			---	---	---				
114										
115	A.13 Financial Management <i>Source: CWSRF Financial Risks: Program Objectives, Risk Analysis and Useful Tools (2013)</i>									
116	1 Have all cumulative SRF data system "Fund Analysis" indicators (10) for the State shown good or improving performance in recent years, as compared to previous years? [Memos-- "Implementation of DWSRF Financial Indicators (dwsrf03-02)", "Implementation of CWSRF Financial Indicators (srf01-03)", and "Implementation of Additional SRF Financial Indicators (2018)"]			---	---	---	** Financial indicators are improving in performance			
117	2 What are the State's leveraging activities as described in the bond documents, Annual Report and IUP (such as ratio, amount, impact on SRF interest rates, etc)? (N/A if the state does not leverage) Briefly summarize.			---	→	---				
118										
119	A.14 Compliance with Audit Requirements <i>Source: 40 CFR §35.3165, §35.3570, 2 CFR 200</i> <i>Note: All questions apply to the independent audit and Single Audit</i>						** state has submitted all current audits			
120	1 Are annual independent audits being conducted by an independent auditor, in addition to the State Single Audit?			---	---	---				
121	a. Who conducted the most recent audits? Note date of most recent audits in Notes column.			---	→	---				
122	b. Did the program receive an unqualified opinion in one or both audits? If a qualified opinion was given, note the reason(s) in the Notes column			---	---	---				
123	c. Were the audits clear of findings? If no, describe the findings and resolutions in the Notes section and follow up as necessary onsite.			---	---	---				
124	d. Are the financial statements in conformance with GAAP?			---	---	---				
125	2 Were the audits free of any negative comments or issues regarding the State's SRF internal control structure? If no, list any problem areas identified.			---	---	---				

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126	a. Were the audits clean from any improper payments/cash draws/disbursements? If no and improper payments were identified, what was the reason and amount of the improper payment? If federal draw was involved, must be reported in PER.			---	---	---				
127	3 Is the most recent audit free of any repeat findings (from previous audits)?			---	---	---				
128	4 Did the most recent audits find state cash management and investment practices consistent with State law, policies, and any applicable bond requirements?			---	---	---				
129										
130	<p>A.15 Cash Draws & Transaction Testing Sources: 40 CFR §35.3155(d)(5), SRF 13-04, 40 CFR § 35.3560</p>									
131	1 As stated in the IUP, what proportionality ratio (or method) is the State using for cash draws?				→					
132	a. Is this the appropriate/correct ratio based on EPA memo SRF 13-04?			Yes	---	---				
133										
134	<p>A.16 [DW Only] DWSRF Withholding Determinations Source: SDWA 1452(a)(G)</p>									
135	1 Did the Regional Capacity Development and Operator Certification Coordinators review the state's ongoing implementation of these programs?			Yes	---	---				
136	2 Is there a memo in the file (or other notation of record), signed by the Regional Administrator or Water Division Director, documenting that EPA has determined that the state is implementing its capacity development strategy and no withholding will be necessary? (This is a statutory mandate for the EPA to make such a determination each year.)			---	---	---				
137	3 Is there a memo in the file (or other notation of record), signed by the Regional Administrator or Water Division Director, documenting that EPA has determined that the state is implementing its operator certification strategy and no withholding will be necessary? (This is a statutory mandate for the EPA to make such a determination each year.)			---	---	---				
138	4 Has the state updated its Capacity Development Strategy to include asset management (per AWIA Section 2012)			---	---	---				

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2	Required Program Elements									
3										
4	State / Program / Review Year: MS/DWSRF/2022					Reviewer's Name:				
5	Review Item and Questions to Answer			Yes	No	N/A	Onsite Discussion Summary			
6										
7	<p>P.1 Implementing Federal Requirements <i>Sources: Final WRRDA Guidance of January 6, 2015, EPA American Iron & Steel Policy Memo, Mar 20 2014, EPA Capitalization Grant Conditions; EPA Signage Policy Memo, Implementation of DWSRF-Related SDWA Amendments in the WIIN Act Memo (June 6, 2017), America's Water Infrastructure Act of 2018 (AWIA) amendments to SDWA</i></p>									
8	<p>1 Has the State's process for implementing the following requirements remained the same since the last Annual Review? (if changes have been made, describe the changes briefly in the Onsite Discussion Summary section)</p>									
9										
10	a. [CW ONLY] A&E services procurement requirement (FWPCA Section 602(b)(14))						X			
11	b. [CW ONLY] Fiscal Sustainability Plans (FWPCA Section 603(d)(1)(E))						X			
12	c. [CW ONLY] Cost & Effectiveness (FWPCA Section 602(b)(13))						X			
13	d. American Iron and Steel (FWPCA Section 608: applies to all treatment works projects) (SDWA 1452(a)(4): applies to all public water system projects)			X						
14	e. State Environmental Review Process			X						
15	f. Davis-Bacon (CW applies to all treatment works projects; DW: applies to all assistance agreements)			X						
16	g. Signage Requirements			X				Note: MSDH is in the process of amending loan agreements made in FY22 to include BIL signage requirements.		
17	h. [CW only] Affordability Criteria, FWPCA Section 603(i)(2)						X			
18	i. [DW only] Disadvantaged Community Program per SDWA 1452(d)			X						
19	j. Other Federal Requirements (the Super Crosscutters, equivalency requirements)			X						
20										
21	<p>P.2 Operating Agreement <i>Source - CWSRF Regulations, 40 C.F.R. §35.3130(b); DWSRF Regulations 40 CFR § 35.3545(c)</i></p>									
22	<p>1 Does the Operating Agreement reflect all current procedures and processes?</p>									
23	a. [DW only] Does the State plan to update the OA to include changes resulting from WIIN/AWIA?			X				The relevant changes resulting from WIIN (e.g., the changes in the DWSRF set-aside cost match and calculation of the ceiling of the Admin and TA set-aside, AIS, ..) and AWIA (additional subsidization requirements, AIS, state capacity development strategy, ...) are reflected in the IUP rather than the Operating Agreement.		
24	b. Does the state plan to update their OA to include changes due to BIL (e.g., BABA, CWSRF 2% technical assistance funds)?			X				If the State uses the same strategy as in the past, it is likely they will use other documents to reflect these changes, e.g. integrating BABA requirements in the IUP, loan agreements and construction documents.		
25	c. If the OA does require an update, did the Region & State agree to a plan for updating (i.e. adding an amendment, using examples from other states, etc.)?						X	Martha - did you have any discussion with MSDH about an update to their OA?		
26										
27	<p>P.3 Intended Use Plan Public Comment <i>Source - CWSRF Regulations, 40 C.F.R. §35.3150(a); DWSRF Regulations 40 CFR § 35.3555(b)</i></p>									

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2	Required Program Elements										
3											
4	State / Program / Review Year: MS/DWSRF/2022					Reviewer's Name:					
5											
6	Review Item and Questions to Answer			Yes	No	N/A	Onsite Discussion Summary				
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33											
34	P.4 Green Project Reserve Requirements										
35	1 [CW only] If the State has not met the GPR requirement for the year under review, what is their plan to meet the requirement?*										
36	a. If the State identified carryover GPR projects in the Annual Report, what actions is the State taking to ensure that these projects have an assistance agreement by the end of the fiscal year?										
37	2 [CW only] Is the State's current process for marketing and solicitation of GPR projects adequate for identifying a sufficient number of GPR projects?										
38	a. If no, does the State plan to revise their marketing and solicitation process?										
39	* The EPA Green Infrastructure Policy for the Clean Water State Revolving Funds dated January 6, 2016, the Green Project Reserve Policy for waivers dated December 22, 2011 and the Questions and Answers on the Additional Subsidization and Green Project Reserve Provisions dated August 19, 2013 clarify that the GPR requirement for a given year's appropriation is met when the minimum GPR funds required are in executed assistance agreements. These documents also clarify that states have two years to enter into an assistance agreement for GPR projects identified in the Intended Use Plan. If a project has not signed a loan agreement by the end of the second fiscal year, the State must include an explanation in the Annual Report along with anticipated milestones, and must meet those milestones by the end of the third fiscal year.										
40											
41											
42											
43											
44											
45	P.5 SRF Administration										
46	1 Was staffing for the year in review sufficient to manage the program?										
47	2 How many C/DWSRF staff members does the State have in the following areas?										
48	a. Accounting & Finance										
49	b. Engineering and field inspection										
50	c. Environmental review / planning										
51	d. Management										
52	e. Supporting disadvantaged communities										
53	3 What is the State C/DWSRF program's current situation with regard to hiring and training new staff?										
54											
55	P.6 Compliance with Environmental Review Requirements Source - CWSRF Regulations, 40 C.F.R §35.3140; DWSRF Regulations, 40 C.F.R §35.3580; NEPA Regulations 40 C.F.R. Part 6										

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Required Program Elements										
2										
3										
4	State / Program / Review Year: MS/DWSRF/2022					Reviewer's Name:				
5										
6	Review Item and Questions to Answer	Yes	No	N/A	Onsite Discussion Summary					
56	1	Has the State made any updates or changes to the Environmental Review process that are not reflected in the SERP?		X		The environmental review process detailed in the SERP in Appendix C of the DWISRLF Program regulation has not changed, however EPA noted that there were two relevant changes in the intergovernmental review process that feeds into the SERP. (1) DWISRLF Program regulations Rule 3.3.2 Item 6 references a final approval letter from the State Clearinghouse required as part of the application package to demonstrate completion of the intergovernmental review process which includes the environmental crosscutters. However this agency no longer exists. (2) DWISRLF Program regulations Appendix K Intergovernmental Review Process indicates that USACE will be consulted for floodplain impact review however this is not done in practice.				
57	2	Were any of the projects funded during the review year subject to public controversy or documented public concerns? [Note: List any projects for which public controversy occurred, even if they were not reviewed during the onsite review.]		X		No comments on an projects funded in FY22; according to MSDH there have been no comments on any Cat Ex determination in the past 15 years.				
58	a.	If yes, did the state have the ability to adequately address the controversy?			X					
59	b.	Is the controversy resolved? If no, discuss any ongoing issues or concerns.			X					
60										
61	P.7 Compliance with Federal Cross-Cutting Authorities (Cross-Cutters) <i>Sources: EPA Crosscutter Memo, November 13, 2015, Civil Rights Act Title VI, SRF-14-02, CWSRF Regulations 40 C.F.R. §35.3145), DWSRF Regulations 40 C.F.R. §35.3575</i>									
62	1	Has the State implemented a streamlined cross-cutter review consistent with EPA's November 5, 2013 memo? (Source: EPA Crosscutter Policy Memo, November 5, 2013)		X		DWSRF Engineering Coordinator expressed an interest in doing this; they are already eliminating the intergovernmental review for simple projects like water metering. EPA is providing the EPA Crosscutter Policy Memo and will follow up on next steps.				
63	2	Were there any issues requiring informal consultation with other State or Federal agencies? (If yes, provide details in the Onsite Discussion Summary section)		X		MSDH mentioned that USACE has three offices in MS and there is sometimes confusion about the correct contacts for a project. Otherwise, no other issues were raised on this item.				
64	a.	Does the state have an adequate process for resolving issues with State or Federal cross-cutter agencies?			X	MSDH's SOPs and facilities plan checklist has details on how to interface with these agencies. Furthermore, MSDH confirmed that all environmental cross-cutter review agencies have online processes which is facilitating the process, and they maintain a document of cross-cutter agency contact information for use by the consulting engineers that are responsible for the clearance requests.				

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Required Program Elements						
State / Program / Review Year: MS/DWSRF/2022				Reviewer's Name:		
Review Item and Questions to Answer		Yes	No	N/A	Onsite Discussion Summary	
2						
3						
4						
5						
6						
65	3	Has the state been effective in implementing Disadvantaged Business Enterprise (DBE) requirements and communicating the requirements to assistance recipients? If no, briefly describe any challenges or problems encountered. <i>Note: this includes checking that states are no longer using EPA's expired 6100 forms</i>			Loan Agreement Article II "Warranties, Representations and Covenants" includes Section 2.02 "Compliance with State Statutes and Regulations" and refers to compliance with the DWSIRLF Regulations. Those regulations include Appendix E "DWSIRLF Disadvantaged Business Enterprise Requirements" and lists the six good faith efforts for procurement of non-professional services, equipment, supplies and construction. In addition, the Loan Agreement Article X "Project Specific Loan Conditions" includes Section 10.01 (5) also requiring the loan recipient to undertake the six good faith efforts listed in Appendix E of the DWSIRLF regulations, and indicating the fair share objectives negotiated for the project.	
66	4	Does the State ensure that the assistance recipient complies with Civil Rights requirements by:*			Loan Agreement refers to requirements of Appendix H of the state's DWSRF regulations, which include the Civil Rights Act of 1964. MSDH also requires assistance applicants to complete EPA form 4700-4 as part of facilities plan, which makes reference to civil rights lawsuits and compliance.	
67		a. Providing initial and continuing notice that it does not discriminate on the basis of race, color, national origin, sex, age, or disability in its programs or activities?				
68		b. Providing appropriate polices or procedures to provide access to its services for persons with limited English proficiency?				
69		c. Instituting grievance procedures to assure the prompt and fair resolution of complaints when a violation of Title VI of the Civil Rights Act or Title 40 CFR Part 5 or 7 is alleged?				
70	5	For the Federal Flood Risk Management Standard (Executive Order 13690), which of the three methods is the state using?				
71		a. Climate-informed Science Approach		X		
72		b. Freeboard Valve Approach		X		
73		c. The 0.2-percent-annual-chance Flood Approach (aka 500-year Flood)			The State is still using the 1% annual-chance-flood (i.e., 100-year flood) to determine the floodplain. EPA informed MSDH that the re-instated Federal Flood Risk Management Standard should be used starting for projects funded in FY22. EPA will provide again the EPA guidance memo on the EO 13690 and work with them to ensure the requirements are integrated into their processes and documentation going forward.	
74		d. Combination of the three, depending on the project (if selected, more detail should be provided in the discussion summary)	X			
75				X		
76	P.8 Funding Eligibility <i>Sources: CWSRF Regulations, 40 C.F.R. §35.3155 and §35.3160, Final WRRDA Guidance of January 6, 2015, DWSRF Regulations, 40 C.F.R. §35.3520 and §35.3525; Implementation of DWSRF-Related SDWA Amendments in the WIIN Act Memo (June 6, 2017); AWIA</i>					
77	1	[CW only] What challenges or limitations exist to funding new eligibilities (such as new decentralized systems, water conservation & efficiency, watershed projects, water reuse & recycling, or nonprofit technical assistance)?			Not applicable.	

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3										
4	State / Program / Review Year: MS/DWSRF/2022					Reviewer's Name:				
5	Review Item and Questions to Answer			Yes	No	N/A	Onsite Discussion Summary			
6										
78	a. Does the state anticipate any significant changes to eligibilities in the foreseeable future? Describe any changes needed.					X				
	2 [DW only] How does the State ensure that systems in significant noncompliance with any National Primary Drinking Water Regulations are not receiving assistance, except to achieve compliance?						According to MSDH "All new community and non-transient non-community PWS must be approved by the Mississippi State Department of Health (MSDH) prior to beginning construction per the Mississippi Safe Drinking Water Act (Section 41-26-8, MS Code of 1972 Annotated). In addition, the Executive Director of the Mississippi Public Utilities Staff must certify that any new PWS has adequate managerial and financial capacities to meet all the SDWA regulations." To ensure these requirements are met, MSDH routinely carries out Public Water System Capacity Assessments during sanitary surveys of public water systems. This Capacity Assessment is used to evaluate technical, managerial and financial capacity and is referred to during the application review process. MSDH - through its use of the Small Systems Technical Assistance Set-Aside - works to improve the technical, financial and managerial capacities of small systems to comply with requirements of the SDWA.			
79										
80	3 If the State is providing subsidy in the form of grant funds, do assistance agreements require compliance with the Uniform Grants Guidance (2 CFR 200)?									
81										
82	P.9 Programmatic Risks									
83	1 What in the State's view are the main programmatic risks facing the program, and what steps are being taken to avoid and/or mitigate them?						→			
	2 In the Region's view, are there other areas of programmatic risk that the State should be considering? If so, have these been discussed and addressed during the review?									
84										
85										
86	P.10 Domestic Procurement Preference Requirements									
87	1 Has the State issued any non-compliance letters to assistance recipients? If so, please provide a short summary list (and provide a copy of any non-compliance letters)									
88	2 Does the State follow-up on EPA HQ informal site visit draft reports and if so, what is the State's process?									
89										
90	P.11 [DW only] DWSRF Withholding Determinations									
91	1 How does the State assess any proposed new systems regarding TMF capacity?						→ See response to P.8 Number 2 above.			
92										
93	P.12 [DW only] DWSRF, PWSS, and Enforcement Coordination									
94	1 Do the State DWSRF and PWSS Programs coordinate and regularly interact at the management and operational levels to ensure operation of both programs in a mutually reinforcing manner? Provide details about the interaction in the "Onsite Discussion Summary" section.									
95	2 Is there a Memorandum of Agreement or other documentation delineating the mutual expectations and responsibilities of each program?									

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6	Review Item and Questions to Answer			Yes	No	N/A	Onsite Discussion Summary				
96	3	Do staff of each program express satisfaction with the coordination between the programs and can they cite examples of successful coordination?									
97	4	Does the DWSRF coordinate and consult with the PWSS Enforcement Program in identifying potential IUP projects? (e.g., utilize the ETT scores)									
98	5	Are specific efforts made by the DWSRF Program to solicit assistance applications from systems identified by the PWSS Enforcement Program as needing infrastructure investment?									
99	6	Do the DWSRF, PWSS, and Enforcement Programs coordinate in deciding the nature of set-aside assistance to be offered to systems facing compliance and/or enforcement issues?									
100											
101	P.13 Resiliency and Climate Change Mitigation										
102	1	Does the SRF promote resiliency and climate change mitigation when marketing its program?*			X						
		a. If so, how is this done and have marketing efforts been successful?						<p>MSDH does not use the terms "resiliency" and "climate change adaptation" per se in its marketing and program implementation, however it is addressing these objectives in its project implementation in several ways. Most recently it is doing so by requiring the preparation of asset management plans for all projects starting in July 2023. MSDH has been preparing systems for this requirement by offering asset management trainings financed by its Small Systems Technical Assistance Set-Aside and conducted by the Mississippi Rural Water Association. That being said, MSDH has always considered resiliency of systems in its evaluation of project proposals, for example by verifying source water capacity and considering 20-year water projections. MSDH also requires assistance applicants to comply with its "Recommended Minimum Design Criteria for Community Water Supplies" and "Guidance for the Design of DWSIRLF Funded Drinking Water Facilities" which includes redundancy on chlorination, back-up water sources, back-up power, mitigation for risks associated with projects located in a floodplain, emergency response plans, vulnerability analyses, etc.</p> <p>MSDH has also been promoting project activities that yield cost savings as well as climate benefits, including through renewable energy (e.g. solar panels) at plants and automated water metering in the distribution system.</p> <p>MSDH considers that these efforts have been successful.</p>			
103											
104	2	Does the SRF require any resiliency or climate change mitigation related aspects to be incorporated into projects?									

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5											
6	Review Item and Questions to Answer			Yes	No	N/A	Onsite Discussion Summary				
105	a. If so, how is this done? (e.g. Is the floodplain standard (FFRMS) required to be addressed for all projects? Are water audits required? Are cybersecurity measures required?)						All DWSRF projects must comply with requirements of MSDH documents "Recommended Minimum Design Criteria for Community Water Supplies" and "Guidance for the Design of DWSIRLF Funded Drinking Water Facilities". See examples of required elements in those design criteria in previous response. In addition, MSDH applies all equivalency requirements to all projects, including the environmental cross-cutters including the Executive Order on Floodplains (although they have been using the 100-year flood rather than the 500-year flood for floodplain determination) and flood risk mitigation. According to MSDH, their PWSS program is doing outreach on cybersecurity at water facilities and they are taking part in related trainings at AWWA and Mississippi Rural Water Association in an effort to integrate these kinds of considerations in the DWSRF. They indicated that training on these resiliency issues is needed by the state's utilities.				
106	3 Does the SRF provide incentives to encourage incorporating resiliency or climate change mitigation related aspects into projects? a. What incentives does the SRF provide?			X			According to MSDH, the most important way they are promoting resiliency (besides the required design standards) is by prioritizing consolidation of systems in its project rankings (i.e., through additional points). An opportunity for further incentivizing resiliency and climate change and adaptation would be through a renewed focus on the Green Project Reserve. MSDH reports that "Since FFY-2016 no recipient in Mississippi has chosen to have its project classified as a project that exhibited the elements of green infrastructure, water efficiency improvements, energy efficiency improvements, or other environmentally innovative projects [i.e., Green Project Reserve]." EPA noticed that the FY22 IUP still refers to the need for a business case for projects aiming for classification as a "green infrastructure" project; the business case is no longer required. EPA suggested in the review that MSDH could offer applicants additional points for resiliency in the project ranking form and in the consideration for principal forgiveness. EPA offered to work with MSDH to integrate these ideas in the next round of project applications.				
107											
108											

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3														
4	State / Program / Review Year:					Reviewer's Name:								
5	Review Item and Questions to Answer					Yes			No		N/A		Onsite Discussion Summary	
6														
7	F.1 Assistance Terms <i>Sources: Final WRRDA Guidance of January 6, 2015, most recent SRF appropriations act , AWIA amendments to SDWA; WIIN Implementation Memo</i>													
8														
9	1 What is the State's process for evaluating the project's useful life for the purposes of setting the loan term?					→							** Facilities Plan checklist ; design life is supported by engineer for project - potential to streamline review process for approval	
10	2 How does the State periodically evaluate terms of assistance offered relative to the supply and demand for funds and the Fund's long-term financial health?													
11	F.2 Use of Fees <i>Sources: Final WRRDA Guidance of January 6, 2015, 40 CFR Part 35 Guidance on Fees Charged by States to Recipients of Clean Water State Revolving Fund Program Assistance, DWSRF Regulations, 40 C.F.R §35.3530</i>												Revenues to pay for Program administrative costs will be collected through an administration fee of 5% of the initial loan principal or the total amount of interest due over the life of the loan, whichever is less. This fee will be collected from the interest portion of loan repayments on all FFY-2022 loans.	
12														
13	1 Discuss with the State its overall position regarding its fee structure, especially in regards to the following:													
14	a. Is the annual fee income adequate for the State's administrative expenses and other intended uses?													
15	If the balance in the fee account is in excess of the amount needed for the State's administrative expenses and other intended uses, does the state have a plan/intended use for these funds? If not, have they considered reducing their fee rate?													
16	c. How often does the State re-consider its fee rate?													
17	d. Does the state waive fees for certain recipients fo reduce barriers to application for disadvantaged communities?					→								
18														
19	F.3 State Match <i>Sources: 40 CFR Part 35: State Revolving Fund Implementation Regulations, SRF 13-04</i>													

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1	Required Financial Elements																
2																	
3																	
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5	Review Item and Questions to Answer					Yes			No			N/A			Onsite Discussion Summary		
6																	
7	1 Is the state's source of match sufficient to provide the current years required match and into the foreseeable future? a. If no, what steps is the state taking to address this? Discuss onsite and in the PER.					→											
20																	
21																	
22	2 For those grants fully drawn during the year under review, do the State's accounting records indicate that the required match has been deposited and disbursed as required?																
23																	
24																	
25	F.4 Timely and Expeditious Use of Funds <i>Sources: 40 CFR §35.3135(d), SRF-99-05, SRF-99-09, DWSRF-14-02</i>					→											
26																	
27																	
28	F.5 Financial Management <i>Source: CWSRF Financial Risks: Program Objectives, Risk Analysis and Useful Tools (2013)</i>					→											
29																	
30																	
31	1 How is the state's financial management designed to achieve its short and long-term financial goals? a. Do the state's financial goals include steps to address any recently identified areas of financial risk identified by the state or region (e.g., improper payments, ULOs)?					→											
32																	
33																	
34	2 What is the State's long-term financial plan to direct the program? a. How often is the plan reviewed and updated? b. Does planning address types of assistance and terms, use of leveraging, and transfers or cross-collateralization between programs?					→											
	3 Is the state conducting SRF financial modeling that uses SRF funds' past performance to forecast future lending capacity as part of their long-term financial planning?											** Budge authority (see previous page) put cash flow model on hold temporarily; during next legislative session the program will pursue extending the funding line with support of "IFS" and NorthBridge's assistance					

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1	Required Financial Elements																
2																	
3																	
4	State / Program / Review Year:					Reviewer's Name:											
5	Review Item and Questions to Answer					Yes			No			N/A			Onsite Discussion Summary		
6																	
7	a. If so, please provide a brief description of what type of analyses they have done. If not, does the state intend to incorporate such modeling into their long-term financial planning going forward? If not, why not?					→											
35																	
36	4 Are issues related to loan restructuring, the potential for defaults, and the timeliness of loan repayments being handled adequately by the State? <i>(Check N/A if there are no issues, and provide details if there are issues)</i>																
37	5 Are net bond proceeds, interest earnings, and repayments being deposited into the fund?																
38	6 Provide a brief summary of the State's disbursement process, including what documentation is required for disbursement requests, and the disbursement request review process					→											
39																	
40	F.6 Compliance with Audit Requirements																
	<i>Sources: 40 CFR §35.3165, §35.3570; 2 CFR 200 Subpart F, EPA Memo SRF07-03, "Clarification of Single Audit Requirements Under the Clean Water and Drinking Water State Revolving Fund Programs"</i>																
41	1 Does the State have an independent audit conducted of the Financial Statements of the Fund?																
42	a. What was the time period covered by the audit that was available at the time of the review?					→											
43	b. Has the State planned corrective actions for any findings included in this Financial Statement Audit?																
44	c. Have any audit findings from the prior year been resolved?																
45	2 Does the State have a Single Audit conducted of the Fund? <i>(This may be part of the Statewide Single Audit)</i>																
46	a. What was the time period covered by the audit that was available at the time of the review?					→											
47	b. Has the State planned corrective actions for any findings included in this Single Audit?																
48	c. Have any audit findings from the prior year been resolved?																
49	3 What is the State's process for:																

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2										
3										
4	State / Program / Review Year:				Reviewer's Name:					
5	Review Item and Questions to Answer				Yes	No	N/A	Onsite Discussion Summary		
6										
7										
50	a. Complying with subrecipient monitoring audit requirements? Is the requirement applied to only equivalency projects or all projects that expended more than \$750,000 in federal funds?							* Follow up regarding who monitors single audit compliance		
51	b. Obtaining/reviewing assistance recipients' single audits?					→				
52	c. Following up with assistance recipients to resolve findings, as needed?									
53	d. How does the State notify recipients of the single audit requirements; if they expended more than \$750,000 in federal funds?									
54										
	F.7 Cash Draws & Transaction Testing									
55	<i>Sources: 40 CFR §35.3155(d)(5), 40 CFR § 35.3560; SRF 13-04 ; EPA SOP 1.5: Transaction Testing for Improper Payments</i>									
56	1 Are the State's disbursement process and internal controls adequate to ensure that disbursements adhere to the Federal cash draw rules? <i>(The reviewer should use their best judgement to answer this question based on a discussion with the State. For DWSRF, where available, reviewers should use the State internal control walk through provided by HQ)</i>									
57	a. What is the average length of time between request and disbursement?					→				
58	2 Have all payments made by the State been correct and proper? (If no, indicate any improper payments detected by the state or EPA and what corrective actions have been taken in the Onsite Discussion column. Report all federal improper payments in the PER)									
59	a. Were all improper payments adequately resolved?									
60	b. If improper payments occurred as a result of internal control deficiencies, how will the State review and/or modify its internal controls to decrease the potential for improper payments to occur in the future?						→			
61										
	F.8 Assessment of Financial Capability and Loan Security									
62	<i>Sources: 40 CFR 35.3120(iv), 40 CFR 35.3115, 40 CFR §35.3520; 40 CFR §35.3545, 2 CFR §200</i>									
63	1 [CW Only] Does the State have procedures for assessing the financial capability of assistance recipients? What are the major components of the procedures?									

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2														
3														
4	State / Program / Review Year:					Reviewer's Name:								
5	Review Item and Questions to Answer					Yes			No		N/A		Onsite Discussion Summary	
6														
7														
64	2 [DW Only] What is the State's process for determining system TMF capacity prior to signing an assistance agreement?					→			See response to P.8 Number 2.					
65	3 If the State is providing subsidy in the form of grant funds, do assistance agreements require compliance with the Uniform Grants Guidance (2 CFR 200)?													
66														
67	F.9 Financial Risks <i>Sources: 40 CFR 35.3115, CWSRF Financial Risks: Program Objectives, Risk Analysis and Useful Tools (2013); 40 CFR §35.3525</i>													
68	1 What in the State's view are the main financial risks facing the program, and what steps are being taken to avoid and/or mitigate them?					→								
69														

**Annual Review Checklist
Programmatic Section**

A	B	C	D	E	F	G	H	I	J	K				
1	DWSRF Set-Asides													
2														
3														
4	State / Program / Review Year:					Reviewer's Name:								
5	Review Item and Questions to Answer										Yes	No	N/A	Onsite Discussion Summary
6														
7	D.1 General Set-Aside Funding													
8	<i>Sources: 40 CFR §35.3535</i>													
9	1 Did the State submit a workplan for set-aside activity that includes all amounts used (reserved and/or current year), activity descriptions, goals and milestones?													
10	a. Does the authority to establish assistance priorities and carry out oversight and related activities (other than financial administration) remain with the state PWSS program?													
11	b. Are federal cross-cutters and the SERP considered in set-aside activities (other than administrative activities)?													
12	2 Did EPA approve any significant changes to planned activities and/or budgets from what was originally described in its work plans? N/A if no significant changes were made.													
13	a. If so, has the State amended its work plan(s) and submitted it (them) to EPA for approval?													
14	3 Are set-aside funds attached to specific projects with a schedule?													
15	a. Were success measures identified and reported for each project?													
16	b. Is the State making adequate progress towards milestones?													
17	c. Were all set-aside project schedule milestones achieved in the past year?													
18	4 Did the State follow the work plan? If not, did they revise it?													
19														
20	D.2 General Account Management													
21	1 Does the State account for each of the set-asides separately as required by 40 CFR 35.3540b?													
22	a. For loans made under 1452(k), are principal and interest repayments kept in a separate dedicated account?													
23	b. Does the State subject the 1452(k) account to the same management oversight requirements as the Fund?													
24														
25	D.3 Specific Set-Aside Requirements													
26	1 For the State activities that are proportionally funded with set-aside funds, is the proportion appropriate?													

State / Program / Review Year:	Reviewer's Name:			
Review Item and Questions to Answer	Yes	No	N/A	Onsite Discussion Summary
B.1 Increase Investment in Disadvantaged Communities				
<i>Source: BIL Implementation Memorandum, March 2022</i>				
1 Does the state have a plan to provide 49% of funds through the SRF General Supplemental Funding as grants and/or forgivable loans to disadvantaged communities or communities that meet the state's affordability criteria?				
2 Has the state evaluated and revised the SRF disadvantaged community definition or affordability criteria since the previous IUP? (If changes have been made, describe the changes briefly in the Onsite Discussion Summary section)				
a. [CW only] Are the criteria consistent with the CWA (i.e., income, unemployment data, population trends)?				
b. [DW only] Is the disadvantaged community definition consistent with the SDWA ("the service area of a public water system that meets affordability criteria established after public review and comment by the state in which the public water system is located")?				
c. Does the definition or the criteria capture both urban and rural disadvantaged communities?				
3 Does the state's SRF priority point system ensure disadvantaged communities are receiving funding given the weight associated with points for project ranking criteria?				
4 [CW only] Does the state plan to use the CWSRF 2% TA funds to proactively identify, reach out to, and assist rural, small, and tribal publicly owned treatment works, particularly in disadvantaged communities?				
5 [DW only] Does the state plan to use the full DWSRF 2% small system TA set-aside to proactively identify, reach out to, and assist small drinking water systems, particularly in disadvantaged communities?				
6 Does the state plan to take their full BIL General supplemental allotment?				
B.2 Address PFAS and Emerging Contaminants				
<i>Source: BIL Implementation Memorandum, March 2022</i>				
1 [CW only] Has the state identified a pipeline of CWSRF eligible emerging contaminants projects or does the state have a plan in place for building the project pipeline?			X	
2 [DW only] Does the state have a plan to provide 25% of funds through the DWSRF Emerging Contaminants Funding as grants and/or forgivable loans to disadvantaged communities or public water systems serving fewer than 25,000 people?				
3 [DW only] Are projects that address PFAS prioritized above projects addressing other contaminants?				
4 Does the state plan to take their full BIL emerging contaminants supplemental allotment?				
B.3 [DW only] Make Rapid Progress on Lead Service Line Replacement				
<i>Source: BIL Implementation Memorandum, March 2022</i>				
1 Does the state have a plan to provide 49% of funds through the DWSRF LSLR Funding as grants and/or forgivable loans to disadvantaged communities?				
2 Is the state using set asides or other funding to help water systems develop LSL inventories and undertake replacement planning?				
3 Do the projects on the IUP fully replace both public- and private-side LSLs?				
4 Do the projects on the IUP fully pay for both public- and private-side LSLs?				
B.4 Support Resilience and One Water Innovation				
<i>Source: BIL Implementation Memorandum, March 2022</i>				
1 Is the state prioritizing projects that foster resilience to all threats and hazards, consistent with Presidential Policy Directive (PPD) 21?				
2 Does the state support water, infrastructure projects that apply the best available and most geographically relevant climate information, projections, and standards, such as the Federal Flood Risk Management Standard?				
3 Does the state incorporate climate resilience criteria into their prioritization of SRF funding under the BIL?				
4 How does the state SRF program support local water and wastewater agencies' efforts to reduce nitrous oxide and methane emissions, incorporate renewable energy generation, and complete other projects that reduce the greenhouse gas footprint of the water industry (e.g., priority points, financial incentives, etc.)?				
B.5 Support American Workers and Renew the Water Workforce				
<i>Source: BIL Implementation Memorandum, March 2022</i>				
1 Does the state encourage or participate in pre-apprenticeship, registered apprenticeship, and youth training programs to support the water workforce?				
2 Does the state inform and encourage SRF funding recipients to support safe, equitable, and fair labor practices?				
3 Is the state interested in learning more about these practices?				

B.6 Refine State SRFs to Build the Pipeline of Projects

Source: BIL Implementation Memorandum, March 2022

- 1 Has the state taken actions to reduce the burden of applying to the SRFs? (examples: moving to a digital application process or coordinating applications and requirements across funding programs)
- 2 Has the state maximized flexibility for project application timeline, such as eliminating application deadlines or operating a year-round application cycle with quarterly project ranking?
- 3 Does the state offer pre-development and pre-construction funding to seed project development for small and disadvantaged communities?
- 4 Does the state encourage regionalization, partnerships, and/or nonphysical consolidation through the application process? This could be through ranking criteria, financial incentives, loan condition, application requirements, or another mechanism.
- 5 Has the state worked to increase internal and external outreach and communications about the SRF programs and the BIL funding? If so, how?
- 6 What is the state's process for identifying and prioritizing communities in need of technical assistance to overcome barriers to application?

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