

# Indian Health Service Sanitation Facilities Construction



## Overview of Current Project Funding Assistance for Water/Sanitation Facilities And Questions/Answers

Regional Tribal Operations Committee Meeting

Wednesday, May 29, 2024

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IHS California Area



# Introduction

## Topics:

1. Authorities, Mission, and Area Offices
2. Sanitation Deficiency System
3. Overview of Needs and Funding
4. Questions/Answers

## Frequent Abbreviations:

- **SFC:** IHS Sanitation Facilities Construction Program
- **SDS:** Sanitation Deficiency System
- **IJA:** Infrastructure Investment and Jobs Act (i.e. project funding)



# SFC Authorities

## **Public Law (P.L.) 86-121, the Indian Sanitation Facilities Act (1959):**

- Created the IHS Sanitation Facilities Construction (SFC) Program
- Gives the SFC Program the authority for providing essential water supply and sewage facilities
- Ability to make agreements with Tribes

## **P.L. 94-437, the Indian Health Care Improvement Act (1988):**

- Created SDS reporting system and the deficiency levels



# SFC Mission Activities

**In partnership with the tribes, the SFC Program provides the following services:**

1. Maintain inventory of sanitation deficiencies (SDS)
2. Environmental engineering assistance
3. Project development with multi-agencies
4. Funding for water supply, wastewater, and solid waste projects
5. Professional design and construction services
6. Advocate for Tribes on environmental public health issues
7. O&M training and technical consultation
8. Emergency response services

# 12 IHS Areas





# Sanitation Deficiency System and Regular and IIJA Funds

- Sanitation Deficiency System (SDS) is an SFC database of proposed projects to correct sanitation deficiencies (water, wastewater, or solid waste) affecting existing Indian homes and actual conditions
- Each Area updates SDS annually and reports to SFC HQ by August 1
- Annual updates allows SFC to add new projects, update existing projects, and remove funded projects
- Annual SDS listing is reported to Congress to officially document the known sanitation deficiencies in Indian Country



# Typical SDS Projects

- Water projects for drinking water systems, community or individual (e.g. water supply, treatment, distribution)
- Sewer projects for community or individual systems (e.g. collection, pumping, disposal, septic systems)
- Solid waste infrastructure (e.g. transfer stations).
- All deficiencies and projects are for existing homes/systems and conditions.
- SDS project score is the based on eight factors: 1) Health Impact; 2) Deficiency Level; 3) Previous Service; 4) Capital Cost; 5) O&M Capability; 6) Contribution; 7) Tribal; 8) Other Considerations

# Example SDS Project Narrative

Printed: 07/08/2008 05:49PM (Eastern)

wSTARS

Printed By: Rash Jonathan

## SDS NARRATIVE

Project/Phase Name: [REDACTED] Pipe Replacement Number: [REDACTED] Priority: 3 Econ Feasible: Y  
 (Not Funded)  
 Area: CALIFORNIA Community Name: [REDACTED] Project: 12 Feasibility  
 Overridden: N  
 Tribe: [REDACTED] District: Escondido Phase: 01 IHS Reviewed: P  
 EPA PWS ID: Field Office: Escondido Self Gov Code: C

Engineer: Bush Sean Last Updated By: Bush Sean Last Update: 06/19/2008

DEFICIENCY LEVELS		RATING SCORES			
Initial: 3	Final: 1	Health Impact: 15	Capital Cost: 16	Tribal: 16	
		Deficiency: 12	O & M Capability: 14	Other Considerations: 0	
		Previous Service: 0	Contribution: 0	Total Score: 73	

Community State Code	Home Type	Eligible	Number of Homes	Initial Def. Level	Final Def. Level	First Service	Water Service	Sewer Service	Solid Waste Service	O & M Service
A	[REDACTED]	E1	Y	45	3	1	N	Y	N	N
B	[REDACTED]	E1	Y	40	3	1	N	Y	N	N
G	[REDACTED]	H1	Y	52	3	1	N	Y	N	N
H	[REDACTED]	H1	Y	1	3	1	N	Y	N	N
Total: 138										

COST DATA	IHS Cost	IHS Unit Cost	Eligible Cost	Eligible Unit Cost	Allowable Unit Cost	Contributions	Ineligible Cost	Total Cost
Water:	\$213,000	\$1,543	\$213,000	\$1,543	\$18,900			\$213,000
Sewer:	0	0	\$0	\$0	\$18,900			\$0
Solid:	0	0	\$0	\$0	8,100			\$0
O & M:	0	N/A	0	N/A	N/A			\$0
<b>Total</b>	<b>\$213,000</b>	<b>\$1,543</b>	<b>\$213,000</b>	<b>\$1,543</b>	<b>\$54,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$213,000</b>

Special Requirements: none

### EXISTING DEFICIENCIES:

**Water:** Numerous locations where piping has failed and forced non routine repairs, more than 5 documented breaks per year. Locations requiring repair include: [REDACTED] ~600' 6" AC pipe (3 failures), [REDACTED] spur line is 475' of 3" thin wall (15 repairs made in past 2 years), [REDACTED] is 350' of undersized 6" AC pipe that has high flow rates during fire flow events and there is 80' of 4" galvanized pipe suspended above [REDACTED] that has approximately 8 pin hole leaks per 20' section. Additionally, the AC pipe needs to be professionally decommissioned as a health threat during repairs.

**Sewer:** None  
**Sol. Wst.:** None  
**O & M:** None

### PROPOSED FACILITIES:

**Water:** Replace the [REDACTED] with 10" C900. Replace the [REDACTED] spur line with 300' of 6" C900 with a fire hydrant and 175' of 4" C900. Replace the [REDACTED] with 10" C900. Replace the [REDACTED] suspended pipe with 4" galvanized steel pipe.

**Sewer:** None  
**Sol. Wst.:** None



# SDS Project Tiers

SDS Project Tiers: SDS uses a system of Project Tiers 1-2-3.

The screenshot displays the STARS (Sanitation Tracking and Reporting System) interface. The main page shows the 'SDS PROJECT OVERVIEW' for project 'UFO Scattered Sewer-DL 3' (Project Number: CA49503-1001). The project is currently at Tier 1: Ready to Fund. A modal window titled 'Edit Project Tier Status' is open, showing a dropdown menu with options: Tier 1: Ready To Fund (selected), -- Unspecified, Tier 2: Engineering Assessed, and Tier 3: Preliminarily Assessed. There is also a checkbox for 'mark as recommended by me'. The background interface includes navigation tabs (SDS, PDS, HPS, OMDS, HITS, Service Requests, Reports, Community, Library) and a sidebar with 'PROJECT STATUS & INFO' and 'RATING SCORES'.

**Project/Phase Name:** UFO Scattered Sewer-DL 3

**Project Number:** CA49503-1001

**PRIORITY:** 9

**REPORTABLE:** Yes

**ECONOMICALLY FEASIBLE:** [Unspecified]

**PROJECT TIER:** 1

**Ready to Fund**

**Recommended:** 07/05/2022 by Mazorra David

**Approved:** 07/27/2022 by Rash, Jonathan

**Comments:** reviewed

**Created:** 06/24/2022

**Last Update:** 11/14/2022 by Brady Chris

**Last Submittal:** 2023 (IHS National)

**Engineer:**

**Project Pri**

**Delivery M**

**Procureme**

**PROJECT STATUS & INFO**

**RATING SCORES**

# SDS Project Tiers

## SDS Project Tiers

SDS uses a system of Project Tiers. The Tier system is used by the Area SFC Director to recommend and certify the level of accuracy and planning that has gone into each SDS project.

Tier	Accuracy Range	Ready to Fund	Used in Calculation of Area's IJA Fund Allocation	Could be Included for IJA Planning Funds
Tier 1: Ready to Fund	+/- 10%	Yes	Yes	N/A
Tier 2: Engineering Assessed	+/- 25%	No	No	Yes
Tier 3: Preliminarily Assessed	Best Available Info	No	No	Yes



# IHS SFC Regular and IIJA Funds

- Regular and IIJA funds allocated based on level of need (deficiencies) documented in the SDS
- Area's funding based on SDS Tier 1 ("Ready to Fund") projects
- Funding also available for Tier 2-3 planning projects (e.g. make ready for a Tier 1 project)
- IIJA funds allocated for Tier 1 projects on SDS FY2021 list (e.g. legacy projects)
- Regular funds allocated for Tier 1 projects on SDS after FY2021 list (e.g. new SDS projects)
- SDS also used for EPA Clean Water Indian Set-Aside (CWISA) funds

# SFC National Overview of Previous Need and Funding

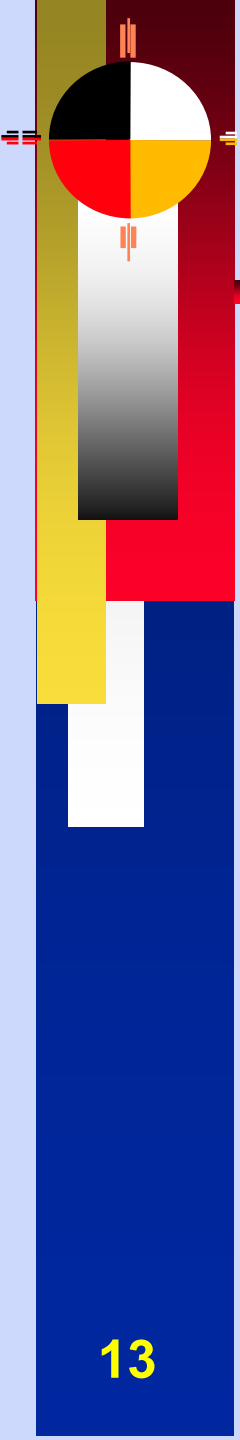
## Need from Sanitation Deficiency System (SDS), Dec 2020:

- Over \$3 billion total need

## Funding in FY 2021:

- \$192 million appropriation for projects
- Only funding for about 6% of the total need





# SFC National Overview of IIJA Funding

## **Infrastructure Investment and Jobs Act (IIJA):**

- SFC funding was historically too low to address all sanitation needs, which created a large backlog of projects
- In 2021, Congress appropriated \$3.5 billion in Infrastructure Investment and Jobs Act (IIJA) funding to IHS for SFC projects
- IIJA \$3.5 billion allocated at \$700 million per year for 5 years from FYs 2022–2026
- Total annual SFC project funding is now four times greater than it was in previous FYs

# Questions/Answers

## 1. How much project funding did the California Area receive?

### FY 2011 to 2020:

- \$3.9 million annual average, Regular funds

### FY 2022 to 2024:

- \$20.0 million annual average, Regular and IIJA funds
- Includes over \$53.7 million of IIJA funding
- In addition, over \$14.1 million from EPA



# Questions/Answers

## 2. How many projects did the California Area fund?

### Funding and Projects:

- Over \$60.2 million of IIJA and Regular funding to address SDS projects
- 42 construction projects
- 21 planning projects
- 14 existing construction projects with shortfalls (i.e. address higher costs due to inflation)





## Questions/Answers

### 3. What are some of the benefits and challenges from all the funding?

#### **Benefits:**

- SFC funding was historically too low to address all sanitation needs; created a large backlog of projects
- IIJA \$3.5 billion will address many of those needs

#### **Challenges:**

- Influx of funds requires IHS to rapidly increase its capacity for administering SFC projects
- Meeting related hiring and administrative needs
- Managing priorities between existing and new IIJA projects





# Questions/Answers

**4. What are the project activities that take time to complete?**

**Once project is funded (MOA signed), many project activities including:**

- Surveying
  - Environmental compliance (NEPA)
  - Additional testing (soils)
  - Design facilities
  - Complete drawings and specifications
  - Solicitation and award
  - Construction
- 
- Average duration = +/- 4 years



# Questions/Answers

**5. What are the challenges or impacts that may cause project delays?**

**May have unanticipated delays from:**

- Obtaining easements/rights-of-way
- Environmental clearances
- Qualified contractors to submit bids
- Insufficient funds to make an award; need additional funds to cover shortfall, especially if non-Indian homes are on the system
- Field office staffing fluctuations and vacancies



# Questions/Answers

## 6. How is the California Area addressing some of the challenges?

### Steps taken:

- Hiring new SFC staff – 10 additional engineers and engineering technicians at Area and field offices
- Team of 4 at Area dedicated to provide technical assistance to field offices on surveying and designs (drawings and specifications)
- In coordination with Tribes and EPA, use of outside engineering firms to complete studies and designs



# Questions/Answers

**7. Only Tier 1 SDS projects are determined as ready for funding. What is a Tier 1 project?**

**SDS projects that are Tier 1 include items:**

- Well-defined scope/detailed investigation
- Documented deficiency and solution
- Detailed and current cost estimate
- External funding source (tribal or other) has been identified and documented for the ineligible costs
- Completed preliminary design of main system components (e.g. water main alignment and size)
- Sufficient planning in order to determine and mitigate risks (e.g. environmental, land status)
- Preliminary Engineering Report (PER)



## Questions/Answers

### **8. If the SDS project is not Tier 1, then what next? How can it become ready for funding?**

- If the SDS project is not Tier 1, it's designated as either Tier 2 or Tier 3.
- Some Tier 2-3 projects may need more documentation in order to become a Tier 1.
- Some Tier 2-3 project may need additional planning to determine risks; e.g. engineering study/report, environmental, land status.
- Funds can be allocated to the SDS project to complete planning services.
- Expectation to complete planning; then SDS project as Tier 1, fund following year

# Local IHS SFC California Area Offices

- Contact info at: [www.ihs.gov/california/](http://www.ihs.gov/california/)

The screenshot displays the Indian Health Service (IHS) website for the California Area. The header includes the IHS logo and the text "The Federal Health Program for American Indians and Alaska Natives". Navigation menus include "Home", "About IHS", "Locations", "for Patients", "for Providers", "Community Health", "Career Opportunities", and "Newsroom". A secondary menu for the California Area includes "HEALTH PROGRAMS", "TRIBAL CONSULTATION", "NEWS & EVENTS", "ABOUT US", "OFFICES", and "FAQS".

The main content area is titled "OEH&E District & Field Offices" and includes the following text:

**OEH&E District & Field Offices**

The California Area IHS, Office of Environmental Health & Engineering (OEH&E) has strategically located field offices throughout California (Redding, Arcata, Sacramento, Ukiah, Clovis, and Escondido) to effectively serve Indian individuals, communities, and health programs. Staffing in these locations includes professional engineers, engineer technicians, environmental health specialists, utility consultants, and administrative support. The information below identifies staffing by name and position for each specific location, addresses, phone and fax numbers. For assistance, contact the office nearest to you.

A map of California is shown, divided into districts: Redding District (blue), Sacramento District (green), and Escondido District (purple). Specific field offices are marked with red dots: Arcata Field Office, Ukiah Field Office, Clovis Field Office, Redding District Office, Sacramento District Office, and Escondido District Office. A legend at the bottom identifies the symbols for Field Office, District Office, and Area Office.

On the left side of the page, a vertical navigation menu lists various services: Contact Us, Staff Directory, Desert Sage Youth Wellness Center, Office of the Area Director, Office of Public Health, Office of Management Support, Office of Environmental Health & Engineering, and OEH&E District & Field Offices (which is highlighted).

# Conclusion

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- Questions and discussion