



Technical, Managerial, and Financial Support for Lead Service Line Replacement (TMF LSLR) Grant Frequently Asked Questions (FAQs)

ELIGIBILITY

1. What activities are grant eligible?

- a. The primary purpose of this grant is to fund physical verification of service line materials at properties where lead is suspected but not confirmed or where service line material is unknown but likely contains lead. Grant dollars can be used to determine the composition of service line materials. Proposals may also include project planning document development related to lead line replacements and outreach/education in support of lead service line replacement activities that arise from the service line material verification supported by this grant.

2. What is the earliest date that costs will be eligible for reimbursement?

- a. The TMF LSLR grant can reimburse eligible costs incurred on or after October 1, 2023.

3. Can communities use pre-existing contracts for pot holing?

- a. Yes, if the service line materials verification work in that contract was competitively bid per the local government's requirements previously. However, only pot holing that occurred on or after October 1, 2023 will be eligible for reimbursement. Please also note that if a pre-existing contract including service line material verification work includes ANY construction, repair, or alteration activities (which are not grant eligible), Davis-Bacon prevailing wage requirements apply, and additional compliance certification may be required for your TMF LSLR grant. It is up to each individual community to determine whether their specific contract will require Davis Bacon compliance. Please visit [Government Contracts Compliance Assistance | U.S. Department of Labor \(dol.gov\)](https://www.dol.gov/eis/whistleblowers) for further clarification on Davis-Bacon requirements.

4. Can the TMF grant reimburse costs related to the development of project planning documents containing work in addition to or other than lead service line replacement?

- a. No. The TMF grant can only reimburse costs associated with the development of project planning documents exclusively focused on lead service line replacement. In other words, if the project planning document includes any water infrastructure work other than LSLR, the grant will be unable to pay for the creation and development of that project plan.

5. Can applicants request to verify service lines installed after 1988?

- a. The use of lead service lines was officially prohibited in Michigan in 1988; therefore, EGLE expects service lines installed after 1988 to be of known, non-lead material. However, if a lack of records or other factors give applicants substantial reason to be concerned that service lines installed after 1988 could contain lead, this grant could evaluate a request to physically verify them. In general, EGLE expects that all service lines requested to be physically verified under this grant were installed prior to 1989.

- 6. Is Distribution System Materials Inventory (DSMI) a grant eligible activity?**
 - a. The TMF grant is focused on the physical verification of service lines at properties where lead is suspected but not confirmed or where service line material is unknown but likely contains lead. While information gathered may enhance a community's DSMI, the primary goal of this program is to determine where lead service lines are located, not to determine the material of all "unknown" service lines.
- 7. Should applicants submit previous DSMI findings as part of their application?**
 - a. No. Applicants only need to clearly state/request the total number of suspected lead service lines they want to physically verify under the grant— no other backup documentation for the requested number of verifications is necessary if the applicant indicates there is reason to suspect they are lead.
- 8. Can this funding be used exclusively for project planning documents, retroactively?**
 - a. No. Costs incurred prior to October 1, 2023 are ineligible. Additionally, physical verification of lead or suspected lead service lines is a compulsory activity to also pursue project planning document creation and development or outreach/education for LSLR programs.
- 9. If a community was already funded for LSLR replacement projects, can we still apply for this grant?**
 - a. The answer depends on your system's needs. If you still have unknown, likely lead lines that are not being covered under existing funding, you may want to consider applying for this grant.
- 10. Are planning costs associated with design/engineering/contract specification for lead service line replacement projects eligible?**
 - a. Planning costs may include any cost related to applying for DWSRF dollars including putting together a project planning document for that program. Design engineering, including contract document development, would be covered under the DWSRF loan/forgiveness and not the TMF grant.
- 11. What types of activities are eligible for LSLR Outreach/Education?**
 - a. Eligible public outreach includes public forums, meetings, and/or educational events to discuss the health impacts from lead in drinking water and the importance of lead service line replacements. Additionally, communication activities with homeowners and/or residents where lead lines are discovered may be eligible. Other activities may be taken into consideration by EGLE.
- 12. If a separate DWSRF project planning document is prepared for LSLR activities, would a community be scored on the combined list of projects under both planning documents, or would each project be scored independently?**
 - a. DWEHD scores all the projects for DWSRF, it has not yet been determined how the projects as separated out will be scored. It is not our intent to penalize communities for separating out those projects. We are currently having internal discussions about how this will affect those project that have separated LSLR costs from the rest of their infrastructure projects.
- 13. Are point of use filters eligible under this grant?**
 - a. No. Providing temporary filters is not an eligible activity under this grant program.
- 14. How will EGLE discern between water systems trying to confirm lead service lines versus water systems trying to complete their Minimum Service Line Verifications to develop their CDSMI (which is not the intent of this Grant)?**
 - a. This grant is not intended to be used for the identification of ALL lines in a system. Systems need to confirm that lines they are proposing to inspect utilizing TMF grant

funds are likely lead or unknown but likely to contain lead. An EGLE determination of need will be reviewed on a case-by-case basis per water system. Additionally, the cap of \$600,000 per grantee will ultimately limit the ability of most applicants to verify their entire system unnecessarily.

- 15. If a submitted proposal is based on suspected lead service lines and during verification these lines are confirmed to not contain lead, will the grant still cover the cost of material verification?**
 - a. Yes.
- 16. Is the grant funding applicable to asphalt patching and concrete sidewalk patching of excavations from the pothole investigation activities?**
 - a. Yes, restoration of areas disturbed during potholing activities are eligible under this grant.
- 17. Will the verification of suspected galvanized lines previously connected to lead be an eligible activity for this grant?**
 - a. Yes. Those would be considered a service line that needs replacement under the Lead and Copper Rule.
- 18. Are communities that obtained DWAM grant for CDSMI activities eligible for TMF grant as well?**
 - a. If you received a Drinking Water Asset Management (DWAM) grant for your CDSMI you are still eligible to apply for this grant, however priority will be given to systems that did not receive a DWAM grant.
- 19. If a water line is damaged during inspection will costs for repair be covered under this grant?**
 - a. This will have to be evaluated on a case-by-case basis as/if it occurs, but in general language on damages should be included in an applicant's contract with their contractor.
- 20. Some communities don't know where curb boxes are located. Will this grant fund field verification of curb boxes and GIS system development?**
 - a. If there is a reason to suspect that that service line is lead and you need to locate the service box in order to verify service line material on either side of the curb box, then yes that activity would be grant eligible. This is not an asset management grant, so the development of comprehensive asset inventories of your entire system should not be included in grant activities.
- 21. If lead is found, can the municipality pay to replace the service line during inspection.**
 - a. Yes, however, replacement of lines cannot be covered by this grant.
- 22. Can grant funding be available to a system that has already undertaken suspected lead service line verifications prior to 10/1/23?**
 - a. This grant cannot be used to reimburse for any work completed prior to October 1, 2023.
- 23. Are interior inspections at the meter inside the building/residence grant eligible?**
 - a. Yes, if the applicant suspects that service line may contain lead.
- 24. If the Engineering consultant helps put together the application package, can their time be included as an eligible expense?**
 - a. Yes, application fees can be included if incurred after October 1, 2023.

REQUIREMENTS

- 1. What requirements are there for bidding work included in a proposal?**
 - a. All non-professional services must be competitively bid per the local municipal entity's requirements. This includes any contracted work for potholing and/or excavations. Professional services, which include consulting engineering services, do NOT need to be competitively bid.
- 2. Will American Iron and Steel (AIS), Build America Buy America (BABA), and/or Davis Bacon apply to this grant program?**
 - a. BABA and AIS do not apply. Davis Bacon should not apply to potholing/hydrovac work specifically but may be a requirement if the contract between the grantee and their contractor includes any construction, alteration, or repair activities. It is up to each individual community to determine whether their specific contract will require Davis Bacon compliance. Please contact the Department of Labor (DOL) with specific questions pertaining to your unique situation. Please visit [Government Contracts Compliance Assistance | U.S. Department of Labor \(dol.gov\)](https://www.dol.gov/eis/contracts-compliance) for further clarification on Davis-Bacon requirements.
- 3. How long will grantees have to complete the project scope?**
 - a. All project activities MUST be completed, and all costs submitted to EGLE for reimbursement no later than September 15, 2026, or earlier if specified in the grant agreement. Due to the federal source of funding, EGLE cannot extend the end date beyond September 15, 2026.
- 4. Does replacement of sidewalk, curb, or asphalt as part of potholing work count as construction and require Davis Bacon?**
 - b. If a contract is for only excavation (potholing), identification of service line material, and return of the excavated material to the ground, and therefore nothing is being constructed, altered, or repaired, then this is not a construction activity and thereby likely does not need to comply with Davis-Bacon requirements. All applicants/grantees should direct questions regarding Davis-Bacon compliance to the regional enforcement coordinator, Matthew Visnick, whose contact information is below.
216-902-5720 phone/fax
216-203-1621 cell
Visnick.Matthew@dol.gov
- 5. Do applications need to include costs for all 3 items (material verification, planning documents, and education/outreach)? Or can an application be submitted only for material verification?**
 - a. Service line materials verification MUST be an activity included in the proposal to be considered eligible for the grant. Applicants can apply for solely materials verification, or they may submit an application for materials verification plus DWSRF project planning and education and outreach. Applications that are solely for planning documents or education and outreach without materials verification will not be eligible for funding.

REPORTING

- 1. What will the reporting requirements be for the grant?**
 - a. In general, communities will be required to submit at least quarterly status updates. Reimbursement requests should be submitted within 30 days of receiving invoices for eligible work. At the end of the project, a summary of work completed using grant funds must be submitted prior to the payment of the final reimbursement request.
- 2. Does EGLE need to review project planning documents once they are developed within this grant program?**
 - a. No. However, any project planning documents developed under this grant must be exclusively for lead service line replacement work. EGLE reserves the right to request this documentation in the future should the State conduct a programmatic or financial audit.
- 3. Will LSLR projects that are separate from their associated other water infrastructure projects be scored separately for DWSRF project ranking?**
 - a. While we work in collaboration with DWEHD on ranking the projects submitted to the DWSRF program, DWEHD ultimately decides how projects are scored. Any specific scoring questions should be directed to DWEHD.
- 4. Will inspection results need to be sent to EGLE and verified for the TMF grant?**
 - a. No, submitting inspection results is not a requirement of this grant.

MISCELLANEOUS

- 1. What happens if an applicant does not have the capital up front to pay out of pocket prior to reimbursement?**
 - a. EGLE's grants operate on a reimbursement basis meaning funds cannot be released until work occurs. If such a community is prioritized for funding, our grant project managers will work with that community to minimize the time between receiving a reimbursement request and that reimbursement request being paid to the community.
- 2. Given the difficulty for EGLE to award and spend all of the funds from the Bipartisan Infrastructure Law (BIL), what is your expectation the restrictions for municipalities to qualify for these funds being relaxed after the first round of awards are determined?**
 - a. The requirement that these funds can only be spent on planning and not construction is explicit in the legislation for this program and therefore EGLE cannot change that limitation.
- 3. How much total funding is available from this program?**
 - a. \$48 million.
- 4. Can a municipality have more than one project, each costing up to \$600,000, or just one project per municipality?**
 - a. One grant award per municipality.
- 5. If a lead service line is found, how long does the municipality have to replace it?**
 - a. Questions about Lead and Copper Rule implementation should be directed to the Drinking Water and Environmental Health [Lead and Copper Unit](#).