



# STRENGTHENING THE SYSTEM

An Advocacy Report to Improve USDA Rural Development Program Delivery for South Dakota's Rural Water Systems

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## Executive Summary

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Rural water systems across South Dakota are facing persistent and often preventable challenges accessing funding through USDA Rural Development (RD) programs. While RD's mission is to invest in rural infrastructure, the reality on the ground shows that inconsistent program delivery, unclear application procedures, and gaps in staff interpretation have created significant delays and roadblocks. These obstacles directly affect projects that are essential for public health, system resilience, and local economic development.

This Advocacy Report was prepared by On Point Corporation and sponsored by the South Dakota Association of Rural Water Systems (SDARWS) and Rural Water Center. It represents a collaborative effort to strengthen the delivery of USDA RD programs by identifying common administrative barriers and offering constructive, field-informed solutions. The timing of this effort is particularly important as RD navigates transitions in staffing, leadership, and federal priorities.

Our goal is to ensure that USDA Rural Development remains a viable and reliable financial partner for rural water infrastructure investments. Periodic review of program delivery is an essential and healthy part of that process. By capturing real-world impacts and offering actionable recommendations, this report aims to create greater clarity, consistency, and responsiveness within the programs.

The report outlines several recurring issues, including:

1. Parity Agreement Delays and Overcollateralization
2. Overreach in PER Approvals
3. Disjointed Environmental Review Processes
4. Operational Overreach into Technical Decision-Making
5. Lead Agency Role in Environmental Reviews
6. Staffing, Technology, and Process Improvements
7. Construction Financing and Partner Coordination
8. Extended Decision Timelines

We offer this report in the spirit of partnership and rural progress. Our intent is recognize and learn from past experiences while also contributing meaningful solutions that will help RD staff, borrowers, and service providers work together toward more consistent, fair, and timely program implementation.

## About the Author & Sponsoring Organization

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### About On Point Corporation

On Point Corporation is a consulting firm dedicated to advancing rural prosperity through strategic project finance solutions. The firm works with project-level clients, lending institutions, and government agencies to design funding strategies that open access to capital and accelerate investment in rural infrastructure. On Point's work is grounded in collaboration, ensuring that funding partners, service providers, and communities move forward together toward shared goals.

### About the Author

Cayla Holleman is a seasoned project finance and rural development expert with over a decade of hands-on experience navigating USDA Rural Development (RD) programs from every vantage point: agency, banking, and consulting.

Cayla began her career inside USDA Rural Development, where she spent eight years directly administering RD's commercial loan and grant programs. During her tenure, she served as a State-wide team lead, subject matter expert across nearly 20 programs, and a key advisor responsible for technical training, regulatory compliance, and operational oversight. Her firsthand experience working within the agency gives her an intimate understanding of both the strengths and procedural challenges embedded within RD's systems.

After leaving the agency, Cayla transitioned into the banking sector, where she worked on a national scale administering USDA guaranteed loan programs for private lenders. She experienced firsthand how program requirements and operational practices varied not only from state to state, but sometimes from one Area Office to another, often creating preventable delays and inconsistencies for borrowers and co-lenders. This broadened her perspective on how RD programs function in practice and deepened her expertise in federal loan program administration, compliance, and risk management.

In November 2024, Cayla and her partners founded On Point Corporation, a consulting firm dedicated to supporting rural projects by connecting borrowers with financing and helping lenders structure guarantees to extend private capital into rural communities. Through On Point Corporation, Cayla brings a 360-degree view of USDA Rural Development programs to her clients, combining regulatory knowledge, industry insight, and field-tested experience to drive strategic solutions that open access to funding and empower rural America.

Cayla is passionate about improving the effectiveness of rural development programs and ensuring that administrative processes support, rather than hinder, critical infrastructure investment in rural communities. Her approach is always solutions-focused, advocating for improvements in a way that strengthens the agency's ability to fulfill its mission.

## About the Sponsor

This report was sponsored by the South Dakota Association of Rural Water Systems (SDARWS) and Rural Water Center, collectively “The Sponsors”. The Sponsors represents the collective voice of rural water and wastewater systems across the state and are committed to ensuring the member systems have the tools, training, and funding they need to serve their communities. The association actively partners with USDA RD on project development and program implementation, sharing the common goal of delivering reliable, affordable water to rural residents.

As infrastructure challenges increase and demand for clean, reliable water grows, The Sponsors are working to improve how USDA RD programs are delivered in South Dakota. Sponsoring this report reflects The Sponsors’ commitment to collaborative problem-solving. By identifying recurring challenges and offering practical, field-informed recommendations, The Sponsors aim to help strengthen USDA RD’s capacity, remove avoidable barriers, and create a more consistent, transparent process for all stakeholders.



## Introduction & Methodology

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This Advocacy Report was developed through a collaborative effort between the South Dakota Association of Rural Water Systems (SDARWS), Rural Water Center, and On Point Corporation. The process was designed not only to identify operational challenges but also to gather constructive input from those directly involved in planning, financing, and implementing rural water projects.

To ensure the recommendations were grounded in real-world experience, The Sponsors reached out to key stakeholders, including the rural water member systems, across South Dakota's rural water sector. Outreach was conducted through direct communication with system managers, engineers, and project partners, encouraging them to share both specific project examples and broader feedback on USDA Rural Development's Water and Environmental Programs (WEP).

Stakeholders were invited to provide:

- Descriptions of challenges encountered during the RD application, review, and funding process
- Real-world examples of projects impacted by delays or procedural inconsistencies
- Input on how operational processes could be improved without altering core program regulations

Contributors were encouraged to submit their feedback in writing on organizational letterhead to ensure the report could reflect documented, verifiable experiences. This approach also allows the feedback to serve as supporting evidence should future policy or procedural changes require stakeholder testimony.

While this report focuses on the South Dakota experience, the findings and recommendations may have relevance for other states facing similar issues. It is intended as a constructive resource to help USDA RD leadership strengthen program delivery by improving communication, clarifying procedures, and fostering more consistent application of regulations at the state and area office level.

# Key Issues, Regulatory References & Solutions

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## ISSUE 1

### Parity in Water and Environmental Programs

#### Overview

Projects funded jointly by USDA Rural Development (RD) and the State Revolving Fund (SRF) have faced increasing delays over the past three to four years due to challenges in securing parity agreements. RD has often required that all, or nearly all, of a system's assets be pledged as collateral, creating a significant barrier to co-financing. This practice can cause major delays in project advancement and limits a system's ability to secure complementary funding from other lenders.

Stakeholders report inconsistent guidance and unclear expectations regarding:

- The specific value of assets RD requires to cover its outstanding loan
- How lien positions are determined between RD and other lenders in the event of default
- The precise terms or conditions required to enter into a parity agreement with a second financing agency

These inconsistencies have created avoidable conflicts between RD and state-level funders, delaying closing and ultimately jeopardizing rural water development.

#### Regulatory Guidance

##### Security Requirements

Per 7 CFR § 1780.14, "Loans will be secured by the best security position practicable in a manner which will adequately protect the interest of RUS during the repayment period of the loan." The term "adequate" implies full collateralization relative to the loan size, not complete encumbrance of all system assets. Over-collateralizing limits a system's ability to secure complementary funding.

##### Joint Financing Provisions

Per 7 CFR § 1780.14(c), when RD is jointly financing a project with another lender, it may share collateral and must secure a parity lien position. The regulation specifies that parity is intended to ensure each lender is impacted proportionately in the event of default. It does not require RD to have a superior or exclusive claim.

Additional regulatory details from § 1780.14(c)(1-5) clarify:

- Lenders may use different repayment terms
- Trustees or third-party agents are permitted with clear documentation

- Installment shortages and asset liquidation proceeds must be split proportionally
- Protective advances should be treated as shared risk and repaid first, if consistent with state law

## Real World Impact

In South Dakota, projects requiring SRF funding have been delayed by up to 12 to 18 months due to prolonged negotiations over parity agreements. These delays result in increased construction costs, missed funding cycles, and in some cases, loss of grant eligibility. RD’s tendency to insist on blanket asset coverage often conflicts with other lenders’ requirements, creating friction between financing partners and limiting the borrower’s options.

The process has been described as “particularly cumbersome and time consuming,” noting that an office manager spent over six months working on a single parity application. Questions directed to RD were difficult to resolve because even RD staff were unclear on what partnering agencies required.

This level of administrative burden is not sustainable and does not align with the program’s mission to support rural development. Without clearer expectations and more coordinated interagency procedures, parity negotiations will continue to block timely access to critical funding.

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### ISSUE 1 /// PARITY IN WATER AND ENVIRONMENTAL PROGRAMS

## PROPOSED SOLUTIONS & CALL TO ACTION

### 1. Clarify RD’s Collateralization Policy

- Advocate for RD to issue clear internal guidance reinforcing that "adequate collateral" does not mean full encumbrance of all assets.
- Ensure that Area Offices interpret § 1780.14 consistently across states and projects.

### 2. Streamline the Parity Agreement Process

- Request that RD’s legal counsel pre-approve a template parity agreement in collaboration with state SRF authorities.
- Establish a formal timeline for parity agreement negotiation and approval to minimize bottlenecks.

### 3. Policy Oversight and Advocacy

- If operational practices remain misaligned with regulation, engage Congressional partners and industry groups such as NRWA to support national-level policy clarification.
- Encourage RD to issue a procedural notice or policy memo reinforcing the regulatory intent of parity and appropriate collateralization standards.

## ISSUE 2

# Staff Overreach in PER Approvals

### Overview

Stakeholders have reported repeated and prolonged review cycles for Preliminary Engineering Reports (PERs). While RD staff often justify these delays by stating they are ensuring the most efficient use of funds, there have been cases where personal preferences or subjective opinions have influenced whether a project moves forward. In some situations, individual staff members have effectively halted progress by withholding approval without clear, regulation-based justification.

This raises key concerns:

- Does an RD Staff Engineer have the authority to unilaterally hold up, leverage, or kill a project by refusing to approve a PER?
- How can we establish accountability measures to ensure that RD staff are actively assisting projects rather than obstructing them?
- What procedural safeguards can be established to prevent excessive control by any single staff member?

### Regulatory Guidance

There is little regulatory language explicitly defining PER approval expectations, timeframes, or the responsibilities of RD engineers. This lack of structure has resulted in engineers taking more power than they should have and applying subjective discretion beyond what regulations require.

### Key References

7 CFR § 1780.55 outlines general requirements for PERs but does not set specific review timeframes or establish detailed expectations for staff involvement. RD Instruction 1780 provides additional guidance on engineering reviews but lacks enforcement mechanisms that would ensure timely, fair, and consistent application.

### Real World Impact

Several rural water systems in South Dakota have reported delays while waiting for Preliminary Engineering Report (PER) approvals. In some cases, revisions appeared to be based on personal opinion rather than technical necessity, causing unnecessary redesign and increasing project costs. These delays have also impacted funding eligibility for some projects, as critical deadlines for complementary financing programs were missed.

**PROPOSED SOLUTIONS & CALL TO ACTION**

**1. Formalize Review Timeframes and Accountability Measures**

- Push for a Procedural Notice (PN), Unnumbered Letter (UL), or state procedure establishing clear response timeframes for PER reviews, such as a maximum of 30 days per review cycle.

**2. Clarify RD Engineer Responsibilities**

- Adjust procedures to reduce unnecessary reliance on RD Engineers for technical determinations when a PER has been prepared and certified by a qualified, licensed engineer with established familiarity with the water system.
- In most cases, RD should defer to the expertise of the engineering firm, provided licensing and relevant experience requirements are met, thereby minimizing redesign or “reengineering” that is not supported by regulation.

## ISSUE 3

# Disjointed Environmental Review Process

### Overview

Stakeholders report significant delays caused by inconsistencies in how RD programs handle environmental reviews. In some cases, RD will not begin reviewing an application until the environmental review is fully complete. In other cases, RD will not review environmental documents until a full and complete application is submitted and accepted. Both approaches result in unnecessary downtime, as reviews could be conducted in parallel with other processing steps.

While 7 CFR 1970.13 requires that RD complete the environmental review before making a final funding decision, the regulations do not prohibit other elements of the application from moving forward while the environmental review is underway. This misinterpretation of timing requirements has slowed project delivery, increased costs, and caused some projects to miss critical funding windows.

### Regulatory Guidance

7 CFR § 1970.11 (a-b) establishes that environmental reviews should be initiated as early as possible and must be completed before obligation of funds, but it does not restrict RD from proceeding with application review, eligibility verification, or other non-committal steps prior to environmental clearance.

The regulation is clear:

- The environmental process should inform decision-making, not delay it unnecessarily.
- Only fund obligation is contingent on environmental completion, not early-stage processing.

### Real World Impact

These procedural disconnects delay project implementation, drive up costs, and increase administrative burden. Projects are forced to wait weeks or months at multiple stages when processes could have been reviewed concurrently. In some cases, applicants miss funding cycles or experience unnecessary cost escalation because of rigid sequencing.

**PROPOSED SOLUTIONS & CALL TO ACTION**

**1. Clarify Environmental Review Timing**

- Request that RD issue formal guidance stating that environmental reviews can be processed concurrently with other stages of application review, provided no final obligation occurs before environmental clearance.
- Encourage Area Offices to adopt parallel processing as a standard practice to minimize project delays.

**2. Standardize Review Practices Across Programs**

- Develop consistent internal procedures for how environmental documents are received, reviewed, and coordinated with other elements of the application.
- Provide training to RD staff to ensure understanding of the correct regulatory requirements for timing and sequencing.

**3. Improve Coordination with Co-Funders**

- Establish early coordination with other funding partners to align environmental review schedules and avoid duplicated efforts.
- Encourage RD to share environmental findings with partner agencies to reduce redundant reviews and expedite project delivery.

## Clarifying RD's Role in Technical Project Development

### Overview

While RD's financial review is an essential safeguard for public funds, some stakeholders have expressed concern about the extent of RD's involvement in technical aspects of project design and engineering. RD's role is to evaluate how a project is funded and to ensure that financing structures are affordable, sustainable, and compliant with program requirements. However, in some cases, RD staff have gone beyond this role, influencing or directing technical design decisions that are traditionally the responsibility of licensed engineering professionals working directly with the system.

This overlap can lead to additional design revisions, extended timelines, and increased costs. The intent of this feedback is not to diminish the value of RD's expertise, but to encourage a clear distinction between financial review and technical design authority.

### Regulatory Guidance

RD's financial role is to determine if a project is affordable, fundable, and a responsible use of federal resources. There is no specific regulation that authorizes RD staff to override licensed engineering decisions or mandate project redesigns based on preference.

While RD has authority to assess whether a project is "cost-effective," it must balance that responsibility with the technical expertise of licensed professionals and the local control of water system boards and municipalities.

Relevant citations include:

- 7 CFR § 1780.33 - establishes RD's authority to review project feasibility, affordability, and compliance with program rules, but does not position the agency as the lead designer of funded projects.
- 7 CFR § 1780.55 - Licensed professional engineers are responsible for preparing designs and plans that meet applicable state and federal technical standards.
- RUS Bulletins and Engineering Guidelines - Provide templates and standards but are not meant to replace engineering judgment or override state licensure requirements

### Real World Impact

Stakeholders report that when RD assumes an overly directive role in project design, it can result in "re-engineering" work that may not be necessary, disrupts project schedules, and increases overall costs. In some cases, this has delayed projects by several months and created tension between RD, the applicant, and the engineering firm.

**PROPOSED SOLUTIONS & CALL TO ACTION**

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**1. Clarify Roles and Responsibilities**

- Develop internal guidance that clearly differentiates between RD's role in financial and regulatory review and the licensed engineer's role in technical design.
- Encourage RD staff to defer to the engineering firm's technical expertise where appropriate, particularly when the firm has a proven track record with the applicant.

**2. Adjust Procedures to Limit Overreach**

- Reduce reliance on RD Engineers for re-review of technical elements that have already been certified by a licensed engineer.
  - Implement a procedural safeguard that limits RD technical review to verifying compliance and ensuring alignment with the approved funding scope.
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## **Lead Agency for Environmental Review on Substantially Funded Projects**

### **Overview**

When a project is financed by multiple funding sources, the environmental review process can involve several agencies, each with its own procedures, timelines, and documentation requirements. This can create duplication, inconsistent findings, and delays in project implementation. Stakeholders have expressed that when RD provides a significant share of the funding, generally 40 percent or more of federal funds, it would be beneficial for RD to serve as the lead agency for the environmental review process.

Serving as the lead agency would allow RD to coordinate with other funders, streamline document preparation, and avoid repetitive reviews. This approach would also help ensure that the process meets all federal and state requirements while minimizing delays and costs for the applicant.

### **Regulatory Guidance**

- Under 7 CFR 1970 Subpart A, RD has the authority to act as the lead agency for environmental reviews when it is the primary federal funding source.
- Lead agency responsibilities include coordinating the environmental process, consulting with other agencies, consolidating required documentation, and ensuring compliance with the National Environmental Policy Act (NEPA) and other applicable laws.
- RD may enter into Memoranda of Understanding (MOUs) or similar agreements with other agencies to formalize a coordinated review process.

### **Real World Impact**

When RD is not the lead agency, applicants may have to complete multiple environmental reviews in sequence rather than in parallel. This can add months to the project timeline, increase administrative costs, and risk funding delays if one agency's process stalls.

**PROPOSED SOLUTIONS & CALL TO ACTION**

**1. Develop Criteria for RD Lead Agency Designation**

- Propose internal RD guidance that outlines when RD should consider serving as lead agency, such as when its funding exceeds a certain threshold, preferable if the agency is providing 40 percent or more of federal funding.
- Encourage consistent interpretation of RD’s responsibilities under § 1970.5 to reduce ambiguity in project coordination.

**2. Promote Early Interagency Coordination**

- Recommend that RD proactively initiate coordination with other involved agencies at the outset of the environmental review process to determine leadership roles and streamline compliance requirements.

ISSUE 6

# Strengthen RD's Capacity Through Staffing, Technology, and Process Improvements

## Overview

A shortage of staff within USDA Rural Development has become a significant challenge impacting the agency's ability to process applications, complete environmental reviews, and conduct other time-sensitive program activities. These staffing limitations are further compounded by outdated internal systems and software platforms that slow down workflow and contribute to inefficiencies across state and area offices.

Stakeholders report long wait times for communication, delayed project milestones due to backlogs in engineering and environmental review, and inconsistent timelines for approvals. While some of these delays may be unavoidable during periods of federal transition or budgetary constraint, the cumulative effect is a slower and less predictable program experience for applicants.

While these challenges fall partially outside the control of local RD offices, the goal of this report is to stand with the agency in support of improved functionality. Stakeholders are not only advocating for their own efficiency, they are also voicing their readiness to partner with RD to secure the resources, staffing, and systems improvements necessary to better serve rural communities across South Dakota and beyond.

## Real World Impact

Several projects in South Dakota have experienced months-long delays in moving through standard application checkpoints, largely due to understaffing in key positions. Similarly, project sponsors have noted that RD's internal software systems often require duplicate data entry and manual tracking, which slows coordination between program staff and applicants.

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ISSUE 6 /// STRENGTHENING CAPACITY THROUGH STAFFING, TECHNOLOGY, AND PROCESS IMPROVEMENTS

### PROPOSED SOLUTIONS & CALL TO ACTION

#### 1. Support RD Staffing and Technology Requests

- The Sponsors acknowledge that staffing and technology resources are often beyond the control of state offices.
- The Sponsors support the agency's requests for increased staffing allocations, improved software tools, and centralized systems that promote transparency and efficiency.

#### 2. Request Investment in Systems Modernization

- The Sponsors encourage USDA RD to prioritize modernization of internal systems that support workflow tracking, document sharing, and applicant communication.



## ISSUE 7

# Financing Structure Constraints

### Overview

USDA Rural Development's current funding structure poses challenges for rural water systems seeking flexibility in project delivery. Specifically, the inability to utilize alternative construction methods, such as Construction Manager at Risk or owner-led construction, limits the ability of systems to control costs and manage project schedules effectively. RD's structure favors traditional design-bid-build methods, which may not always be the most efficient or feasible option, especially for rural systems operating with limited resources.

Additionally, RD grant funds are often released late in the project cycle, after construction has begun, which contributes to costly delays and unanticipated Change Orders. Borrowers are also unable to draw on RD loan funds without first accruing interim interest, and they are required to secure a partner lender to bridge funding gaps before RD's commitment is finalized. These constraints create unnecessary financial complexity and increase the cost burden on rural systems.

### Real World Impact

Systems report being forced into delivery models that are not well suited for their size, scope, or internal capacity. The late arrival of grant funds leads to rework and contract amendments, while the requirement to front interim financing introduces added risk and cost, especially in a rising interest rate environment. Smaller systems, in particular, struggle to find willing interim lenders, putting critical projects at risk.

One rural water system reported that loan closing was delayed by an additional 90 days, even though the only action required was a signature on a document that had already been prepared. During this time, interim financing continued to accrue at approximately \$5,500 per day, adding more than \$450,000 in avoidable cost to the project.

**PROPOSED SOLUTIONS & CALL TO ACTION**

**1. Expand Eligibility for Alternative Construction Methods**

- Recommend RD adopt procedural flexibility for delivery models like Construction Manager at Risk, Design-Build or owner-led construction when appropriate.
- Issue updated guidance clarifying RD’s intent to support project success, not restrict viable pathways to completion.

**2. Modify Draw Schedules and Interim Financing Requirements**

- Propose adjustments to allow early access to a portion of RD loan funds to reduce interim interest burdens.
- Encourage RD to simplify its partner lender requirements, especially for small or underserved systems.

**3. Enhance Coordination on Grant Timing**

- Recommend tighter alignment between grant obligation and project construction timelines to avoid back-end disbursement issues.

## Extended Decision Timelines

### Overview

From initial application through to final loan and grant approvals, rural water systems frequently experience long and undefined wait times. These delays create uncertainty for project planning, bidding, and construction scheduling. The absence of standardized review and decision timelines undermines project momentum, causes missed construction seasons, and contributes to rising costs across all phases of development.

Applicants and engineering teams have reported prolonged periods of inactivity with no status updates or estimated review completion dates. This lack of transparency impacts not only borrower expectations, but also complicates coordination with other funding partners whose timelines are often more predictable.

### Regulatory Guidance

Current regulations under 7 CFR 1780 do not provide standardized or required processing timelines for each phase of the application cycle. While the program outlines content requirements for technical and financial application elements, it does not include performance benchmarks for how long RD may take to complete application reviews, approve Preliminary Engineering Reports (PERs), or issue funding obligations.

### Real World Impact

Delays in RD decision-making create compounding risks. Contractors may withdraw bids if projects stall. Engineering plans may require revision due to outdated pricing. Co-funders with stricter timelines may retract funding offers.

### PROPOSED SOLUTIONS & CALL TO ACTION

#### 1. Establish Procedural Timeframes

- Propose internal USDA RD guidance or a national procedural notice that defines target review timelines for each major application phase (e.g., 30 days for PER review, 60 days for full application review, 15 days for obligation).

#### 2. Improve Applicant Communication

- Require RD offices to provide estimated decision timelines upon receipt of a completed application and to issue updates if those estimates change.

#### 1. Encourage Use of Project Tracking Tools

- Promote the use of standardized project tracking or shared milestone tools between RD staff and applicants to keep all parties aligned on progress and pending items.

## Appendix A: Letters of Support

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South Dakota Association of Rural Water Systems

WEB Water Development Association Inc.

South Lincoln Rural Water System

Aurora-Brule Rural Water System

Lincoln County Rural Water System

Brookings-Deuel Rural Water System

## Conclusion

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The South Dakota Association of Rural Water Systems, Rural Water Center, and On Point Corporation are deeply committed to supporting the shared mission of USDA Rural Development: strengthening rural communities through investment in critical infrastructure. This report was developed in partnership. It is rooted in the belief that by identifying operational barriers and offering constructive solutions, we can work together to improve outcomes for rural water systems and the communities they serve.

The challenges outlined in this report are not rooted in policy failure. They are the result of how policies are being implemented in the field. Through greater consistency, clearer procedures, and a more collaborative approach to project development, USDA RD can continue to serve as a trusted partner in advancing water infrastructure across South Dakota and beyond.

We offer this report as a tool to support dialogue, drive improvement, and reinforce the value of USDA RD as a critical financing partner. We believe that rural progress is most achievable when public agencies and local stakeholders operate with mutual respect, shared goals, and a willingness to evolve together.

We welcome continued collaboration and stand ready to support USDA RD leadership, staff, and partners in strengthening the systems that make rural development possible.

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