



# Iowa Department of Natural Resources - Disadvantaged Community Analysis

Regulated Entity or Community Name: \_\_\_\_\_ NPDES # (if applicable): \_\_\_\_\_

**Part 1: Disadvantaged Community Analysis (DCA) Form Description** - This form is for use by regulated entities or communities who believe that compliance with federal or state wastewater regulations in a National Pollutant Discharge Elimination System (NPDES) permit or in an Administrative Order from the DNR could result in substantial and widespread economic and social impact (SWESI) to the ratepayers; possibly qualifying the entity or community as disadvantaged. Regulated entities or communities can apply for disadvantaged status in relation to a compliance schedule in an NPDES permit or an Administrative Order, or for the purposes of a grant to install or upgrade wastewater facilities under the Wastewater and Drinking Water Treatment Financial Assistance Program (WTFAP). For more information on form applicability, contact the DNR staff listed at the end of the form.

**Indicate if this DCA is for:**

Determination of disadvantaged status for an NPDES permit or Administrative Order

or

Determination of disadvantaged status for the purposes of a WTFAP grant

**Part 2: Proposed Total Annual Project Costs (TAPC)** – The TAPC are the current costs of wastewater treatment in the community (if any) plus the future costs of proposed wastewater treatment that will meet or exceed all applicable federal or state requirements regarding wastewater treatment. TAPC include all current and proposed facility operation and maintenance (O&M) costs and any existing and proposed debt of the system as expressed in current and proposed sewer rates. The costs will be amortized over a 30 year loan period at an interest rate equal to the current state revolving fund interest rate. Awarded grant funding must be subtracted from the TAPC. **The TAPC must be determined as part of preparing a project plan to meet federal or state regulations regarding wastewater treatment.**

Total Annual Project Costs = [(Estimated costs to design and build proposed project - Awarded grant funding) amortized over 30 years] + Current annual system budget, including O&M and existing debt service + Future annual O&M

**Derive total annual project costs, complete all of the following information, and attach supporting documentation.**

**A. Estimated costs to design and build proposed project:** \$ \_\_\_\_\_

Short description of proposed project (type of wastewater treatment): \_\_\_\_\_

Source of project cost estimate: \_\_\_\_\_

Additional documentation of proposed project and project cost estimate attached

**B. Awarded grant funding:** \$ \_\_\_\_\_ Source of grant funding: \_\_\_\_\_

**C. Current annual system budget, including O&M and any existing debt service:** \$ \_\_\_\_\_

Documentation of current annual system budget, O&M costs, and existing debt service attached

**D. Future annual O&M costs:** \$ \_\_\_\_\_  Documentation of future O&M costs attached

**E. Total Annual Project Costs:** \$ \_\_\_\_\_ *[(A-B) amortized over 30 years] + (C+D) = TAPC*

Information on TAPC calculation attached

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**Part 3: Number of Households or Ratepayers** - Provide the number of households or ratepayers that will be affected by the wastewater regulations or Order and the source of this number. This information can be obtained from recent census data or a recent community survey. If the regulated entity or community conducted the survey that determined the number of households or ratepayers, that survey must be attached. This analysis will consider the current number of households or ratepayers, but information on future projections (anticipated population trends) may also be included.

Complete only one of the following:

**Number of Households:** \_\_\_\_\_ Data Source: \_\_\_\_\_  
or  
**Number of Ratepayers:** \_\_\_\_\_ Data Source: \_\_\_\_\_  
Survey Attached (if necessary):

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**Part 4: Bond Rating of the Community (if available)** - The regulated entity or community must provide the bond rating of the community over the last year, if one is available. If the community does not have a bond rating, state that below.

**Bond Rating of the Community:** \_\_\_\_\_

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**Part 5: User Rates** - The regulated entity or community must submit the current user rates as part of this analysis.

Complete only one of the following:

- A. DCA is for a **municipality or other community**:  
 Current sewer rate ordinances including the sewer rates of any industrial users are attached
- B. DCA is for a **water treatment plant**:  
 Current water rate schedules or tables are attached
- C. DCA is for an **entity other than a municipality, community, or water treatment facility**:  
 Documentation of the monthly ratepayer charge for wastewater treatment is attached

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**Part 6: Additional MHI or Ratepayer Income Information** – Provide the median household income (MHI) for the regulated entity or community. If no MHI is available, the regulated entity or community should conduct an income survey to determine the MHI or provide an estimate, as noted below.

Complete only one of the following:

- A. **DCA is for a municipality, community, or water treatment facility; and an MHI is available.** MHI information can be obtained from the most recent American Community Survey on the State Data Center of Iowa website at [www.iowadatacenter.org/](http://www.iowadatacenter.org/).

**MHI from most recent American Community Survey (U.S. census data):** \$ \_\_\_\_\_

- B. **DCA is for an entity other than a municipality, community, or water treatment facility; and no MHI is available:**
- 1) **Entities with more than ten households or ratepayers;** the MHI as determined by an income survey conducted by the regulated entity. An income survey can be conducted using the Community Development Block Grant (CDBG) income survey toolkit, available at <https://www.hudexchange.info/programs/cdbg/cdbg-income-survey-toolkit/>. The income survey must be attached.

**MHI Determined by Recent Community Income Survey:** \$ \_\_\_\_\_ Survey Attached:

or

- 2) **Entities with ten or fewer households or ratepayers;** an estimate of median household or ratepayer income.

**MHI or Ratepayer Income Estimate:** \$ \_\_\_\_\_ Source of Estimate Attached:

