EPA’s Community Affordability Framework

The first section addresses the 1997 Residential indicator and median household income, then the survey discusses the Financial Capability Indicators, and finally, the survey examines the Affordability Framework and its 2014 revision.

1. The 1997 Residential Indicator (RI) of more than 2% of median household income (MHI) accurately measures the impact of wastewater costs on disadvantaged or vulnerable households/taxpayers.
   - Strongly Agree
   - Agree
   - Disagree
   - Strongly Disagree
   - No Opinion/No basis for judgment

2. Should the MHI be replaced? If so, what alternative should be used?
   - Yes (If yes, please describe what alternative you suggest, in the Other Box)
   - No
   - Other

3. Is the 2% benchmark appropriate for assessing high household/ratepayer burden? If not, what is a more accurate benchmark?
   - Yes
   - No (If no, please discuss a more accurate benchmark in the Other Box below.)
   - Other

4. Should the costs measured in the RI be expanded? If so, what other costs should be included?
   - Yes (If yes, please detail what costs should be included, in the Other Box below.)
   - No
   - Other

5. The 1997 Financial Capability (FCI) (6 data elements for debt burden, socio-economic conditions, and financial operations) accurately measures a community's/permittee's ability to afford the costs of investments needed to achieve Clean Water Act (CWA) goals.
   - Strongly Agree
   - Agree
   - Disagree
   - Strongly Disagree
6. Should EPA’s Affordability Framework include both impacts on households and community/permittee financial capability in assessing the burden of proposed CWA costs?
   - Only household burden
   - Only community/permittee financial capability
   - Either household burden or community/permittee financial capability
   - Both household burden and community/permittee financial capability combined

7. Has EPA’s revised 2014 guidance, which identifies other data elements communities/permittees can present, improved the ability of EPA’s Affordability Framework to identify highly burdened communities/permittees or households?
   - Extremely
   - Very much
   - Somewhat
   - Not at all
   - No opinion

8. Should EPA apply this Affordability Framework to other community/permittee environmental issues [e.g., meeting drinking water or clean air goals]? If so, what should be included and why?
   - Yes (If yes, please discuss what should be included, in the Other Box below.)
   - No
   - Other

9. Have EPA regions and the states applied this more flexible 2014 Affordability Framework consistently for all communities/permittees in their area? If not, what changes are needed to assure greater consistency among permittees?
   - Can we contact you for more information? If so, please enter your email below.

10. How should the Financial Capability Indicator component in EPA’s 1997 Affordability Framework be changed to better measure a community's/permittee's ability to afford the costs of investments needed to achieve CWA goals?
    - Open Ended

11. Are there any additional changes the EPA should make to their revised 2014 guidance that would improve the ability of EPA's Affordability Framework to assess the financial capability of communities/permittees to bear proposed CWA investment costs and their impact on household ratepayers?
    - Open Ended
Integrated Planning Approach
In 2012, the EPA updated its 1997 guidance in a memorandum titled Integrated Municipal Stormwater and Wastewater Planning Approach Framework. This survey section examines your interaction with the 2012 guidance.

1. To what degree has the 2012 guidance changed your approach to developing and implementing effective integrated plans to meet specific CWA water quality standards?
   • It has significantly changed our approach
   • It has moderately changed our approach
   • It has little impact on our approach
   • It has had no impact on our approach
   • No opinion

2. In your experience, how consistent has this guidance been applied among the EPA regions and by the individual states involved in issuing NPDES permits and/or consent decrees?
   • Extremely
   • Moderately
   • Not at all
   • No opinion

3. How can EPA and/or individual states better facilitate the integrated planning process when reviewing and approving the plans developed by you or your members?
   • Open Ended

4. What changes, if any, should EPA make to its current guidance to improve the use, effectiveness, and consistency of its integrated planning process?
   • Open Ended

Role of Cost/Benefit Analysis
1. To what degree does the current guidance consider both costs and benefits of proposed CWA investments?
   • Extremely accurate
   • Very accurate
   • Mildly accurate
   • Not accurate
   • No opinion

2. In assessing a community's/permittee's ability to afford the proposed CWA investment costs, should the EPA include costs and benefits for other community investments to meet other EPA environmental goals?
3. What changes, if any, should EPA make to ensure all costs and benefits of proposed CWA investments are assessed?
   • Open Ended

**Innovative Solutions to Help Meet CWA Water Quality Standards**

This section addresses your interaction with innovative solutions and their effect in relation to CWA Water Quality Standards.

1. What categories of innovative solutions for reducing costs or helping to meet CWA water quality goals have you or your members implemented/proposed?
   • Green Infrastructure
   • Innovative Financing
   • Integrated Planning
   • Regionalization
   • Alternative rate structures/consumer assistance programs
   • N/A

2. Have you been able to determine the net benefits derived from the solutions you have implemented?
   • Yes
   • No
   • N/A

3. Are there impediments to implementing the innovative solutions you have proposed?
   • Yes
   • No
   • N/A

4. What changes do EPA or the states need to make to help communities/permittees identify and implement innovative solutions and address impediments for reducing costs or facilitating the achievement of CWA goals? Please discuss below.
   • Open Ended