CED-77-109





REPORT OF THE COMPTROLLER GENERAL OF THE UNITED STATES

Farmers Home Administration Use Of Grant Funds For Water And Waste Disposal Systems

GAO was asked why the Farmers Home Administration has not always provided the maximum funds allowed by law or its own regulations in providing grants for water and waste disposal systems in rural areas. Of the 650 projects receiving grants in fiscal year 1976 (through June 30), 429 (66 percent) did not receive the highest possible grant.

The Agency said the basic goal is to reduce payments to a reasonable level for farmers, ranchers, rural residents, and other eligible rural users, and that after considering all funding on the projects covered by the analysis, this goal has been accomplished. It said it was not willing to adjust grant amounts on the projects already financed, because it would set a precedent difficult to change.

CED-77-109

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AUGUST 17, 1977



COMPTROLLER GENERAL OF THE UNITED STATES WASHINGTON, D.C. 20548

B-114873

The Honorable James Abourezk United States Senate

Dear Senator Abourezk:

In response to your June 14, July 14, and July 21, 1976, letters, the General Accounting Office (GAO), in cooperation with the National Demonstration Water Project (Project), undertook an analysis regarding your concern that the Farmers Home Admininstration (Agency) was not making grants for rural water and waste disposal projects at the maximum amounts permitted by its regulations and authorized by the Congress. As suggested, we met with the Project and a member of your office; we agreed that the analysis would cover all projects that received an Agency grant during fiscal year 1976 (through June 30). We also agreed that the Project would perform the actual analysis and then make the results available to us to respond to your request.

The completed Project analysis reveals that 429 projects, or 66 percent, of the 650 projects included in the analysis, did not receive the maximum allowable grant. The amount of underobligation for the 429 projects totaled \$28,398,364, or an average of \$66,197 per project. The amounts ranged from a low of \$5 to a high of \$1,257,500.

The Project's analysis also revealed that 78 projects, or 12 percent of the total, received the maximum allowable grant and that 143 projects, or 22 percent of the total, received more than the maximum allowable grant. However, only five projects would be considered overfunded in terms of the authorizing legislation in that the grant for these projects exceeded 50 percent of eligible project costs. The total amount of overfunding for these five projects amounted to only \$20,955. We have given the Agency the details on these five projects so that corrective action can be taken. The remaining 138 projects were apparently overfunded according to Agency regulations but not according to the authorizing legislation.

Our report discusses the development and application of the methods used in the analysis and the potential for making adjustments to the obligations of those projects not receiving the maximum allowable grant. Appendix I contains a State-by-State summary of the number and amounts of underobligated, fully obligated, and overobligated projects. Appendix II is a listing of individual projects showing the amount of underobligation and/or overobligation as computed by the Project. Appendix III identifies, by name, each project in appendix II that was underobligated.

METHODOLOGY OF THE ANALYSIS

The analysis consisted of calculating the maximum grant allowable under the three criteria applicable to the Agency's grant program. The maximum possible grant was determined by selecting the smallest possible grant permitted for a project on the basis of the three following criteria identified in the regulations:

- -- The 50-Percent Rule: By statute, Agency grants cannot exceed 50 percent of total eligible project costs.
- -- The 1-Percent Rule: Agency regulations provide that grants will generally be limited to an amount necessary to reduce the debt service burden, assumed by the community, to 1 percent of the median family income of the community.
- --The Similar Community Rule: Agency regulations provide that grants will be used to reduce user costs to a reasonable level--a rate comparable to that charged in similar communities.

The original methodology developed for the preliminary phase of the study was too rigid in that it assumed that the three criteria for calculating the amount of Agency grant were uniformly applied throughout the country. After an indepth examination of a sample number of projects revealed that the three criteria were not rigidly and uniformly applied in every case, a revised and more comprehensive methodology had to be developed. The revised methodology called for a general case procedure, as well as a set of deviant procedures, to handle the project-by-project variations found in the two Agency forms used in performing the analysis.

Since the Agency did not have specific instructions for determining grant amounts, one had to be developed on the basis of the best information available. We noted that, although the Agency had issued an administrative bulletin

to its State directors relative to determining grant amounts, this bulletin provided only general guidance, and not specific instructions, for determining the amount of a grant. However, since this bulletin was the best information available, we used it as a basis for our methodology so as to have a consistant basis for performing our analysis.

It must be noted that the previous grant determination form did not show how the grant amount was determined, but rather showed the amount of grant and the effect it had on user costs as well as similar data. Following the analysis, the Agency revised its form for determining the grant amount to provide additional guidance in documenting the actual grant determination.

Development and application of the revised methodology was done by the Project with monitoring by us. At three points during the processing of the data, we participated in a comprehensive review of specific case discrepancies and refinement of the deviant procedures.

In calculatiang the maximum possible grant for the projects studied, the general methodology, as developed, was followed, utilizing the data sources identified. However, most of the cases studied deviated from the general case. In fact, only 19 of the 650 projects included in the final analysis did not require the use of at least one deviant procedure. Most of the deviations were the result of numerical discrepancies in the two Agency forms used for the analysis. Twelve projects had to be excluded from the study because there were too many discrepancies or too much missing data in the Agency forms.

Upon completion of the Project's calculations, we randomly selected and analyzed a number of cases to check the validity of the methodology and the accuracy of the calculations. Our sample of 65, or 10 percent, of the projects studied revealed that although some type of error was made in 14, or 21.5 percent, of the cases, in only 5, or 7.7 percent, of the cases did the error affect the amount of grant the project should have received. The net effect of these errors indicate that the Project's computations of total underobligations of \$28.4 million was understated by about 0.49 of 1 percent.

POTENTIAL FOR ADJUSTMENTS OF GRANT AMOUNTS FOR UNDEROBLIGATED PROJECTS

We asked an Agency official if it was legally permissible for the Agency to adjust the amounts of grant and loan obligations for those projects we found that did not receive the maximum allowable grant. In response to our question, the Agency Administrator requested a legal opinion from the Department of Agriculture's Office of the General Counsel. He informed us, on December 17, 1976, that to increase the amount of grant obligation, with a corresponding decrease in the amount of loan obligation, posed a guestion of timing and of purpose for which the funds will be used. The Administrator's response stated:

"* * *if a loan and grant are closed, and the loan money has not been fully advanced, then the grant amount could possibly be increased since FmHA [Farmers Home Administration] still has control and can be certain that the grant funds would be used for eligible purposes."

The Administrator's letter also stated that for constructed projects for which the loan and grant have been closed and all funds expended, that:

"* * *reimbursement by increasing the grant amount and decreasing the loan amount might be interpreted as refinancing, which is an unauthorized use of grant funds."

In an April 25, 1977, letter, to the Acting Administrator of the Agency, we asked whether the Agency would be willing to make adjustments on those projects that were underfunded where it is legally permissible to do so. In his reply, the Acting Administrator stated that the Agency was opposed to retroactively adjusting the grant amounts for those projects covered in our analysis for the following reasons:

- --The computations were based strictly on a mechanical calculation and did not give consideration to the funding priorities established in each State.
- --Agency regulations do not require that the "maximum allowable grant" be made in every case.
- --Other factors, such as the availability of funds from other sources, affect the final determination of the grant amount.

- --The program has accomplished its basic goal of reducing user payments to a reasonable level, and any adjustments in grant amounts would not have a significant impact on the user payments.
- --Adjusting the grants for certain grant recipients covered by the analysis could set a precedent that would be difficult to change.

The Acting Administrator also stated that the Agency's foremost concern is that the benefits of the program be fairly and equitably distributed to all eligible communities desiring Agency assistance, and that he believes that the Agency's present program is being administered in such a manner.

The scope of the report is limited to a discussion of the Project analysis and the Farmers Home Administration's comments concerning adjustments to the obligations of those projects not receiving the maximum allowable grant. We will inform you in the event that the facts raised by the report indicate that action by GAO is needed to insure that the water and waste disposal program is implemented in accordance with congressional intent.

Sincerely yours,

Comptroller General of the United States

APPENDIX II

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	6.36	03.65	72.50	3.85	25.00	21.40	51.90	4 4	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	7 . f	000	31 (2)	67.69	છ. ઉજ	5.50	5.00			9 6) (3)	90	80.00	1.25	16.51	10.4		7 H	1 74	3.08	6.64	77.24	7.00	74.27	3.00	1 C	. U) () () () () ()	10.01	70.7	Л	62.75	45.88	15.42	16.55	57.33	13.70	21.50	82.00	64.25	71.29	26.68	60.00 60.00	16.39	81.55	⊙ ι	0 F . 9 C) (I	7 4 6 6 6	70.00	Л О 1 В 1	4.47	1	101.721	4	MAXGRANT
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3.94	6.50	5,77	6.34	4.90	2.75	8.89	5.53	5.62	1.01	4.29	•	· · ·	D (68.74	£3.77	36.30	20.00	03.20	33.88	20.0	95.34	4,82	%. ₽6	P.34	5.41	9.83	2.28	26.10	9.26	99.51	27,45	91.41	71.83	64.14	8.74	29.16	2.20	2.26		V 2 . 4 %	~ · · · · · · · · · · · · · · · · · · ·	%) · · · · · · · · · · · · · · · · · · ·	100 BO	. Y . Y . Y . Y . Y . Y . Y . Y . Y . Y	· · · · · · · · · · · · · · · · · · ·	40	9.52	7,24	4.48	2.73	0,05	3.26		7 . 7 . 7		- 0	83,783	PCNTMAX
0	88.00	12.00	01.00	98.00	26.10	9.00	35.00	32.50	44.24	0/.2	7 . 7 . 7 . 7 . 7	7 . 7 . 7	45 40	20.02	47.30	49.36	90.00	9.00	20.00	8.82	65.06	42.02	12.00	68.06	797.50	24.60	272.00	62.06	79.88	64.00	52.00	88.02	62.62	74.86	.9%	74.5ľ	40.00	60.0K	28.04	59.65 5.05	27.02	69.82	N . 8 . 8 . 8 . 8 . 8 . 8 . 8 . 8 . 8 .	25 C C	41.86	0 . 50	ひつ・ちゅう	20.00	30.00	27.00	2.00	3.00	3.05	200	200	UT (0	010	40. 888 888	KHAG
4.8	12.7	47.1	89.21	45.76	19.60	81.06	41.31	39.43	54.5	10.1	1 C C C C C C C C C C C C C C C C C C C	* · · · · · · · · · · · · · · · · · · ·	97 T	14.9	7.39	49.36	96.00	9.06	32.26	8.00	73.05	55.26	157.00	001.15	257.50	12.95	178.43	45.23	79.75	4.82	55.78	· 63	3.57	5.00	3.74	2.5 52	9	21.25	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	15	17.62	57.72		75.00	D 0	n u	78. KU	4.	52.20	3.25	3.42	5 65	7,45	7.75	7/2	0	A .	71.616	MAXGKABL
8	4.7	5.1	98.2	7.7	-6.4	63	Ċ	6.9	3		7 0	9 H	70 . 1	. 9	19.96	ė	50	.00	0	(5)	8.05	3.20	5	33.15	62.00	8 35	1,57	14.96	0.75	Ø . 8¢	294.21	83.91	126.42	67.99	15	61.97	40.02	38.74	28.02	N) (38	2 . 27	$S_{\mathcal{L}}$, c	3 U	лů	, ic	4 c	N	Š	4.2	65	4.5	75	70		10 10 10 10 10 10 10 10 10 10 10 10 10 1	11.616	-
8.7	62.30	74.5	53.51	98.5	32.25	81.36	77.77	7.5	100	5 H • U		144 76	259.21	63.24	327.45	49.36	93.24	59.3	06.50	8.00	73.35	45. Øx	57.00	001.15	257.5%	21.64	653.24	07.00	19.75	54.8%	28.15	/2.85	14.00	76.04	02.02	35.46	19.2	7ê.7L	78.30	22.15	4.55	72.5	00.00	75.27	900	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	00.00	16 OF 18 OF	72.20	3.27	16.42	51.34	15.75	57.75	3.72	4 . 7c	45	74.4.2	
4 . 3	67.8	78.47	83.4	45.7	19.60	97.5	41.3	39.40	7 A - O			A. C.	7.5	14.95	27.39	6.62	21.11	58 + 22	76.23	20.46	12.31	55.25	61.82	531 .62	378.46	12.95	178.45	10	35.57	25.71	55.78	100	73,57	12:93	3,74	67.27	2.67	86.65	472.81	51.37	17,62	34.31	98.97	2 66		*2.14	47.65	V 2	10.01	100	11.02	43,98	19.45	4.79	26.89	26.96	20.21	197.700	1
5.2	2.7	7.1	2.6	1,80	6.4	7.29	0,5	, .	. U		7	5	860.63	1.6	050.74	2.95	9.30	1.67	9.3	9 9 4	35	.00	3 8 7	899.1/	405.37		330,51	15	6 1 1	4	. 94	2	7.72	4.71	9	552	23	1.25	.03	5.20	4.2	7,72	19:	7.71	2,6	, ,	J .	7 7	90		3	6	45	.26	.63	9.	5 61	155 - 325 325	

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	بم •	14	•	, <u>La</u>	•	, p.4	. <u></u>	-	.	⊢ ≛ •	,	1- 1	<u>⊢</u> = {	<u>, a</u>	<u>, a (</u>	N		e-	* ·	. .	٠.٧) •	٠	22	<u>, </u>	j.a.	N !	υ n	ن -	·N	2	1 4.	23.	N :	<u> </u>	. .	<u>م</u> ړ (μ .	N 6	V N	, N	23	Ŋ.	∾ :	∾ r	ن -	ئىچ ھ	٠,	ا شه	<u></u>	PURPOSE	
	63.	63.	00.	000	00.	10	1 (1)	(vi	W	S	W	-	7.5	o.	O	vo ·	SO .	ø	o v	D C) (S C	ထ	œ	8	œ	œ	330 (30 C	D C	00	o o	œ	CO.	OD 0	DO O	2 00	QC)	30 t	DC O	യ	သာ	œ	CD)	UT (י ע	,	1 1	7	57.	STATE	
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-	2 4 O . U	0.00	0000	V 10 - 0.1	NO 4 - 5	3 H	n \ \	202.6	57.00	87.0	205.2	682.81	100.00	66.00	58.01	38.00	186.89	176.56	37.5	07.50	, t	267.08	116.00	247.86	156.28	73.00	363.00	73.00	322.82	30.00 30.00 10.00	4 L	20 . To T	112.00	282.0.	122.86	490.00	100 M	122.00	163.00	760.75	221.08	000.75	68.28	169.66	513.22	1891.00	7 0 A V V V V V V V V V V V V V V V V V V	447.00	253.00	1187.062	FHAG	
	V. 40	000.00	0000	N 10 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	0 to 10 to	N N N N N N N N N N N N N N N N N N N	N:2.	57.0	87.00	205.00	620.01	0.01	6.0	19.8	4.6	186.7	176.5	37.5	07.50	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	2 C C C C C C C C C C C C C C C C C C C	96.8	236.35	15 G . 5	73.15	364.56	78.74	326.00	1 0 A D D D D D D D D D D D D D D D D D D) (J. U. K.	N	123.38	294.52	139.87	です。 なった なった	100 kg	150.80	194.21	7, C	20.24	132.66	122.63	262.67	628.39	7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	00 m	444.70	261.5%	1188 198 191	MAXGRAINT	
	Ĺ	. (5	9 5	S 5	9 6	3 6	9 6	. 5	10		2	E . 2 .	.0.36	3	38.91	33.38	0 2	30.3	60	5 6	9 6	9 K	¥ .	. 6	12.48	م الا	ÚT.	. 74	63 1	7	,) N.	1 (4)	4.52	9.87	3 . 4 2	7 70	00	1.71	2.46) i	9 0 0	4.23	3.27	115.39	27.54	2	ָ ט ני	1 · C:	00 00 7 00 1 7 00 1 7 00	110	
i.	9	ט מ אני	A (N 1	J1 (3 (л S л G		1 0	10	000	23	38.7	66.6	8.01	38.0	6.7	76.5	7.5	7.6		97.4	90	10 m	7.5	73.1	64.5	28.20	26.2	95	9 0	5 × 5 × 5 × 5 × 5 × 5 × 5 × 5 × 5 × 5 ×	94.57	60.26	86.26	43.3	50.0°	7 5 8 7 F	22.50	99.56	57.27	20 + K	37.52	11.0	752.5	45.2	962.00	15.07	10 10 10 10 10	1163.34		
	9	4 7 8 9	79.7	A A . 7	0 (5 (, R (7 N	֓֞֝֝֝֝֓֞֝֝֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓	Č	2 6	00	32.0	5	2 . 3	9.0	4.6	68,8	11.3	13,87	37.48	5 (A)		n 0	0.00	3 5	69.31	95.74	78.74	× 1 . 9 3	30 + 34	D 0	74.00	7 G G G G	94.52	39.67		70.72	7 (T)	94.81	14 4 6	- 3 - 1 2 - 1 2 - 1 2	7 1, 6 20 0 40 0	77.50	- N	€28,39	18,54	176.74	49.00	70.04	1000 1000 1000 1000 1000 400 400 400		
	ر د د	A C	D (0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	л (Э (S (1 kg	٠ . چ ج	3 6	0 V V V V V V V V V V V V V V V V V V V	1 /	0.5	8 6 6	75,78	300	09.65	38.00	Ø . 1:	76,50	9.5	7.56	9 6	30 0	75 BY	70.00		9/,78	86.00	97,54	· 62	16.47		1 R 0 0 0 0 1 0 0 R	0 0 0 0 0 0 0	68.21	68.27	34,61	62.19	0 A C C C C C C C C C C C C C C C C C C	12,35	25.73	90.	0 C C C C C C C C C C C C C C C C C C C	* O O O O O O O O O O O O O O O O O O O	78 - 51	11:15	53,97	184.57	23,98	× × × × × × × × × × × × × × × × × × ×	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	i.	

APPENDIX I

UNDER- AND OVEROBLIGATED

WATER AND WASTE DISPOSAL PROJECTS

FY 1976 (JUNE 30)

State	Number	<u>Undero</u> Number	bligations Amount	Overobl: Number	igations Amount	Projects fully obligated	Total number of projects
Alabama	1	22	\$ 838,632	2	\$192,288	-	24
Alaska	60	_	_	1	100,000	-	1
Arizona	2	3	168,300	3	392,996	-	6
Arkansas	3	33	992,358	1	647	1	35
California	4	9	1,132,428	6	510,478	3	18
Colorado	5	7	246,920	2	19,522	-	9
Connecticut	6	2	43,500	-	-	-	2
Delaware	7	_	-	-	-	-	-
Florida	9	5	465,000	2	155,700	1	8
Georgia	10	9	103,960	4	177,049	6	19
Hawaii	61	-	-		-	1	1 API
Idaho	12	_	-	6	211,260	-	APPENDIX 6 .
Illinois	13	18	1,124,900	2	20,688	3	23 H

	State Name	Number	Under Numbe	obligations r Amount	Overobl Number	igations Amount	Projects fully obligated	Total number of projects	APPENDIX
	Indiana	15	3	\$ 69,663	3	\$125,669	1	7	I XI
	Iowa	16	7	50,687	9	476,245	1	17	
	Kansas	18	6	259,626	***	-	1	7	
	Kentucky	20	14	653,065	3	732,411	1	18	
	Louisiana	22	13	70,805	1	53	6	20	
	Maine	23	2	237,774	1	39,299	_	3	
	Maryland	24	2	84,417	3	383,891	1	6	
2	Massachusetts	25	-		3	410,693		3	
	Michigan	26	2	548,304	5	378,181	1	8	
	Minnesota	27	16	1,869,769	3	30,563	-	19	
	Mississippi	28	36	1,811,223	3	151,528	1	40	
	Missouri	29	5	78,450	4	170,967	3	12	
	Montana	31	4	54,751	-	-	1	5	APPENDIX
	Nebraska	32	11	1,093,496	1	17,707	-	12	XIGN
	Nevada	33	_	_	_	· 	-	_	H
	New Hampshire	34		_	1	108,000	-	1	

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State Name	Number	<u>Underd</u> Number	bligations Amount	Overob Number	ligations Amount	Projects fully obligated	Total number of projects	APPENDIX
New Jersey	35	1	\$ 90,150	-	-	-	1	Z H
New Mexico	36	3	15,500	9	\$ 663,724	1	13	
New York	37	6	997,030	4	261,942	-	10	
No. Carolina	38	8	920,377	10	1,048,746	2	20	
No. Dakota	40	5	797,751	1	5,099	_	6	
Ohio	41	13	1,017,509	7	738,188	2	22	
Oklahoma	42	15	712,490	7	208,898	8	30	
Oregon	43	11	696,133	5	60,423	1	17	
Pennsylvania	44	11	1,833,490	_	-	_	11	
Rhode Island	45	_	-	-	-	· <u>-</u>	-	
So. Carolina	46	14	809,601	6	229,953	1	21	
So. Dakota	47	1	479,229	-	-	-	1	
Tennessee	48	34	1,898,609	1	200,000	7	42	APPENDIX
Texas	49	27	1,367,991	12	910,938	3	42	NDIX
Utah	52	2	1,550	2	36,533	_	4 ,	н
Vermont	53	_	-	-	-	-	-	

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State		Underd	bligations	Overol	oligations	Projects fully	Total number of
Name	Number	Number		Number		obligated	projects
Virginia	54	6.,	\$ 1,269,819	1	\$ 1 9, 908	5	12
Washington	56	8	454,802	1	6,440	-	9
West Virginia	57	9	1,138,372	-	-	2	11
Wisconsin	58	24	1,897,928	3	32,251	-	27
Wyoming	59	2	2,005	4	138,300	4	10
Puerto Rico	63	-	-	1	101	10	11
Virgin Islands	<u>64</u>		_	~ <u>-</u>		<u>-</u>	
Total		429	\$ <u>28,398,364</u>	<u>a/143</u>	\$9,367,279	<u>78</u>	<u>650</u>

 $[\]underline{a}$ /Five of these projects exceeded the 50-percent maximum, stipulated in the authorizing legislation, by \$20,955.

GLOSSARY OF COLUMN HEADINGS ON LISTING OF PROJECTS BY STATE AND AMOUNT OF UNDEROBLIGATION AS COMPUTED BY NATIONAL DEMONSTRATION WATER PROJECT

CASE Sequence of project in listing.

SEQNUM Same as CASE.

PROJECT Number assigned to individual project.

PURPOSE Purpose of project. A "1" indicates a water project, and a "2" indicates a waste disposal

project.

STATE Number identifying the State in which the

project is located. (See app. I for

corresponding State names.)

PCNTMAX Percentage of maximum allowable grant. Amount

of actual grant divided by amount of maximum

allowable grant times 100.

FHAG Total Agency grant. Actual amount of money that

was granted to a project.

DIFF Maximum allowable grant minus Agency grant.

CALC1 Maximum allowable grant as determined by the

50-percent rule.

CALC2 Maximum allowable grant as determined by the

1-percent rule.

CALC3 Maximum allowable grant as determined by the

similar community rule.

LISTING OF PROJECTS

UNDEROBLIGATED BY STATE,

PROJECT NUMBER, AND PROJECT NAME

	Project	
State	number	Project name
Alabama (1)	80	Northeast Ala. Water and Sewer and Fire
	100	So. Marengo Co. Water & Fire Protection
	180	Cullman County
	160	Bakerhill Water and Fire Protection Auth.
	220	Roupes Valley Water Authority
	170	Spring Valley Water System
	150	Curry Water Authority
	140	Little Waxie Water Authority
	50	Choctaw-Edna Water & Fire Protection
	20	Greenpond Water System
	250	Pickens County Water Sewer & Fire
	190	V.A.W. Water System, Inc.
	240	Smiths Water Auth.
	70	No. Dallas Co. Water and Fire Protection
	210	Big Wills Water & Fire Protection
	120	St. Elmo-Irvington Water Authority
	110	Kushla Water & Fire Protection Dist.
	90	Rockwood Water Authority
	40	Greenwood Water & Fire Protection
	260	Northwest St. Clair Water System
	60	Goodman Water & Fire Protection
	30	Harrisburg Water Authority

State	Project number	Project name

Arizona (2)	300	Twin City Water Works
	280	Porter Creek Water Co. Inc.
	310	S. Rainbow Valley Water
		Cooperative
Arkansas (3)	580	Vilonia Waterworks Assoc.
Al Kalisas (5)	530	North White Co. Water
	200	Assoc.
	460	Hughes Community Water
		Assoc. Inc.
	500	New London Water Assoc.
		Inc.
	360	Cleveland County Rural
		Water Assoc.
	640	Town of Pottsville
	490	Marysville Water Assoc. Inc.
	510	Wesson Newell Water Assoc.
	590	Town of Cushman
	600	Town of Flippin
	480	Faircrest Water Assoc.
	5960	Four Mile Hill Water
		Assoc. Inc.
	350	Lake Chicot Water Assoc.
	420	Long Lake Water Assoc.
	430	Trumann Rural Water Assoc.
	370	Kelso-Rohwer Water Assoc.
	650	Felsenthal Water Assoc.
	630	Standard-Umpstead Water
		Assoc.
	390	Pleasant View Water Users
	5.70	Assoc.
	570	Vanndale-Birdeye Water
	220	Assoc. Inc.
	330	Bradley County Rural Water
	520 670	City of Clinton
	670 550	City of Lincoln Poplar Grove Sewer Imp.
	550	Dist. #1
	400	Mockingbird Hill Water
	-	Assoc.
	440	City of Vandervoort
	610	Town of Marie
	470	Town of Fifty Six

State	Project number	Project name
	660	City of Cotter
·	620	Town of Western Grove
	340	Locust Bayou Water Corp.
6	560	Town of Lead Hill
	380	City of Branch
		
California (4)	860	Joshua Basin County Water Dist.
	5990	Arrowbear Park County Water Dist.
	900	Butte County Service Area No. 26
	910	San Andreas Sanitary
	310	Dist.
	870	Linden Co. Water Dist.
	750	Inyo County Bishop
	750	AD #1
	890	Allensworth Membership
	030	Water Co.
	770	Mono County June Lake PUD #2
	690	Riverdale PUD Imp. Dist. A
Colorado (5)	5460	Town of Meeker
COTOL ado (5)	5490	Spring Canyon Water and
	3470	Sanitation
	5480	Orchard Mesa Sanitation Dist.
	5560	Town of Milliken
	5470	Archuleta Water Company
	6190	Horseshoe Lake Sanitation Dist.
	5510	Town of Seibert
Connecticut (6)	5570	Town of Burlington
(0,,	950	Town of New Hartford
Florida (9)	980	West Hernando Water & Sewer Dist.
	070	City of High Springs
	970	
	1010	City of Umatilla Astor-Astor Park Water
	1000	Assoc.
	5580	Water and Sewer Dist.
•		#2 Escambia Co.

State	Project number	Project number
	The state of the s	
Georgia (10)	1100 1120 1070 1040 1180 1160 1170 1060	City of Palmetto Town of Lome Oak Town of Whitesburg City of Shellman City of Greenville City of Woodbury City of Demorest City of Kingsland City of Darien
Illinois (13)	1250	Jersey County Rural Water Co. Inc.
	5410 1370 1260 1320 1350 5380 1360 1310 5390 1420 1330 1340 1290 5870 1270 1280 1375	Village of Stewardson Village of West City Fort Massac Water Dist. Village of Altona Village of Davis Village of Sparland Village of Tiskilwa Village of Cave in Rock Village of Plainville Village of Dieterich Village of Claremont Village of Strasburg Village of Strasburg Village of Xenia Town of New Canton Lick Creek Water Dist. Hoyleton Rural Water Co. Village of West City
Indiana (15)	6060 1440 1430	Canaan Utilities Corp. Paxton Water Corp. South Harrison Water Corp.
Iowa (16)	1490 6260 1500 6280 1460 1510	Town of Coulter Town of Fertile Town of Crystal Lake Town of Paton City of Delta Town of Rutland Town of Menlo
Kansas (18)	1590	Rural Water Dist. No. 13 Jefferson Co.

<u>State</u>	Project number	Project name
	1560	Rural Water Dist. No. 2 Barber Co.
	1630	Rural Water Dist. #2 Pottawatomie Co.
	1620	Rural Water Dist. #4 Neosho Co.
	1570	Rural Water Dist. #1 Cloud Co.
	1600	Rural Water Dist. #4 Lyon Co.
Kentucky (20)	1780	Wood Creek Water Dist.
nemedeny (20)	1720	City of Stanton
	1670	Bullock Pen Water Dist.
	1810	Christian County Water Dist.
	1750	City of Dry Ridge
	1660	East Clark County Water Dist.
	1790	Eliho-Rush Branch Water Assoc. Inc.
	5590	City of Barlow
	1740	Morgantown Road Water Dist.
•	1700	Rumsey Water Dist.
	1650	North Barren Water Assoc. Inc.
	1640	Allen County Water Dist.
	1770	Rochester Water Dist.
	1760	Logansport Dunbar Water System Inc.
Louisiana (22)	1970	Village of Calvin
Louisiana (LL)	1870	Keatchie Water System Inc.
	1930	Halfway Carroll Water System Inc.
	1900	Village of Delta
	1860	South Claiborne Water System Inc.
	1840	Southeast Bienville Water System Inc.
	1980	Mt. Zion Water System Inc.
	1990	Walnut Bayou Water Assoc. Inc.

<u>State</u>	Project number	Project name
	1910	Indian Village Water System Inc.
	1830	Mt. Calm Water System Inc.
	1820	Southwest Allen Parish Water
	1920	Lena Water System Inc.
	1940	Corney Water System Inc.
Maine (23)	2030	Town of Wilton
(,	2020	Limestone Water & Sewer Dist.
Maryland (24)	2090	Lavale Sanitary Comm.
, , , , , , , , , , , , , , , , , , , ,	2060	Kent County Sanitary Dist. Inc.
Michigan (26)	2130	Ottowa County
(,	2140	Village of Mattawan
Minnesota (27)	2250	Alexandria Lake Area Dist.
	2210	Marshall Polk Water System
	2350	City of Avon
	2320	City of Isanti
	2190	City of Taunton
	2260	City of Nelson
	2310	City of Harris
	2230	City of Roscoe
	2280	Oakland Sanitary Sewer Dist. #l
	5880	City of Northome
	2240	City of Backus
	2330	City of Lynd
	2340	City of Beardsley
	2270	City of Freeborn
	2290	City of Milroy
	2300	City of Ellendale
Mississippi (28)	5070	Northeast Itawamba Water Assoc. Inc.
	2410	Central Yazoo Water Assoc. Inc.

State	Project number	Project name
New Jersey (35)	2720	Eqq Harbor Township Municipal Utilities
New Mexico (36)	2780	Lower Valley Water Users Assoc.
	5540	Southside Water Users
	2790	San Acacia MDWC Assoc.
New York (37)	5900 5440	Town of Ontario Town of Newfane Sewer Dist. #2
	2840	Village of Deposit
	5890 6160	Village of Sylvan Beach Village of Walton
•	2820	Town of Boston
North Carolina (38	•	Dare County
	2910	Town of Blowing Rock
	2865	Jackson Park Sanitary Dist.
	2900	Perquimans County
	6090	Bell Arthur Water Corp.
	6370	Tyrrell County
	6080	Hertford County
	2890	Handy Sanitary Dist.
North Dakota (40)	3000	Cass Rural Water Users Inc.
	5950	Dakota Water Users Inc.
	2990	Fort Lincoln Estates Coop.
	2980	City of Dunn Center
	2970	City of Dodge
Ohio (41)	3010	Rural Lorain Co. Water Auth.
	5630	Highland County Water Co. Inc.
	5620	Village of West Union
	6410	Scioto Water Inc.
	3060	Village of Prospect
	5610	Jackson County Water Co. Inc.
	6400 ~	Switzer Water Assoc. Inc.

<u>State</u>	Project number	Project name
	3080	Portage County Sewer Dist. No. 4
	5640	Monroe Water Dist.
	3150 3050	Village of West Farminbgton Village of Vanlue
	5650	Old Straitsville Water Assoc.
	3030	Village of Beaverdam
Oklahoma (42)	3190	RWD No. 8 McClain Co.
	3180	Rural Water Sewer & Solid Waste Johnston Co.
	5930	Rural Water Dist. No. 6 Mayes Co.
	3350	Oklahoma Rural Water Inc. Kay Co.
	3280	RWD No. 2 Woodward Co.
	3290	Rural Water Sewer & Solid Waste Mgmt. #6 Grady Co.
	3340	Dale Water Corp.
	3240	Yale Rural Water Corp.
	3320	Rural Water Dist. No. 2 Cotton Co.
	3230	RWD No. 3 Pawnee & Payne
	3300	Watts Public Works Auth.
	5260	RWD No. 1 Cotton Co.
	3330	RWD No. 2 Garvin Co.
	3270	Kerr Water Dist. Seguoyah Co.
	3220	Osage Public Works Auth.
Oregon (43)	3530	Tri City Sanitary Dist.
	3410	Depoe Bay Sanitary Dist.
	3400	City of Canyonville
	3500	Oceanside Water Dist.
	3420	City of Union
	5500	City of Brookings
	3430	City of Glendale
	3510	City of Stanfield
	3440	Glide Water Assoc.
	3480 3520	Beverly Beach Water Dist. Reith Water Dist.

	Project	
<u>State</u>	number	<u>Project name</u>
	2450	Crooked Creek Water Assoc. Inc.
	5240	New Providence Water Assoc. Inc.
	5210	Porterville Water Assoc. Inc.
	5820	East Quitman Water Assoc. Inc.
	5130	Three Forks Water Assoc. Inc.
	2380	Monteray Water Assoc. Inc.
	51 50	Town of Tishomingo
	2370	Evergreen Water Assoc.
	2370	Inc.
	5190	Acona Water Assoc.
	5055	Nicholson Water &
	3033	Sewer Assoc. Inc.
	2430	Panhandle Water Assoc. Inc.
	2390	Wayside Water Assoc.
	5310	East Quitman Water Assoc. Inc.
	2480	East Fernwood Water Assoc. Inc.
	2500	Liberty-Plattsburg Water Assoc.
	2400	Hiwannee Water Assoc. Inc.
	2360	South Lake Water Assoc. Inc.
	5120	Palmer Water Assoc.
	5140	Harmony Central Water Assoc. Inc.
	5060	New Salem Water Assoc. Inc.
	5045	Holcomb Utility Dist.
	5100	New Candler Water Assoc.
	2470	Northeast Perry County
		Utility
	5230	Town of Falkner
	5180	Atlanta Water System Inc.
	5220	Village of Gattman
	2420	Choctaw Water Assoc. Inc.
	5170	Town of Rienzi

State	Project number	Project name
	Humber .	Trojece name
	5090 2440	Denmark Water Assoc. Beat III Greene Co.
	5110	Water System Inc. Polkville Water Assoc.
	5200	C & M Waterworks Assoc. Inc.
	2460	51 55 Water Assoc. Inc.
	5040	Holcomb Utility Dist.
Missouri (29)	5430	<pre>Public Water Supply Dist. #1 Cedar Co.</pre>
	2590	City of Malta Bend
	6000	Public Water Supply Dist. No. 3 Vernon Co.
	2540	City of Graham
	2520	Public Water Supply Dist.
		#6 Stoddard County
Montana (31)	6025	Ashland County Water and Sewer
	6020	Ashland County Water and Sewer
	6145	Basin County Water and/or Sewer
	5365	Carter-Chouteau County Water
Nebraska (32)	2690	Rural Water Dist. No. 3 Otoe Co.
	2670	Rural Water Dist. No. l Dawes Co.
	2680	Little Blue Natural Resources Dist.
	2620	Village of Diller
	2710	Village of Dubois
	2700	Village of Anselmo
	2630	Village of Merriman
	2600	Rural Water Dist. No. 2 Boyd Co.
	2640	Village of Hayes Center
	2660	Village of McLean
	2610	Village of Spencer

State	Project number	Project name
Pennsylvania (44)	6450	Gen. Mun. Auth. Boro. of
	3580	Harveys Lake Windsor Township Municipal Auth.
	3570	Worthington Municipal Auth.
	3560	Mountain Water Assoc.
	5810	Boro. of Wellsville
	0020	Municipal Auth.
	6440	North Lebanon County Auth.
	6420	Millersburg Area Auth.
	5800	Point Township Sewer Auth.
	5830	Connoquenessing Borough
	3630	Auth.
	6430	Royalton Borough Auth.
	6460	Lake Meade Municipal Auth.
Courth Courth (AC)	3660	Danilian County Water 6
South Carolina (46)	3000	Darlington County Water & Sewer Auth.
	3590	Beaufort-Jasper County Water
	3650	Chesterfield Co. RR Water
	3030	Co. Inc.
	5250	Daniel Morgan Rural
	3230	Community
	3690	Wallace Water Co.
	5750	Town of Varnville
	5720	
	3720	Meansville-Riley Road Water Co. Inc.
	5680	Trico Water Co. Inc.
	3670	Marlboro Water Co. Inc.
	5710	Bull Swamp Rural Water Co.
		Inc.
	3680	Marlboro Water Co. Inc.
	5740	Town of Brunson
	3630	Grassy Pond Water Co. Inc.
	3620	Goucher Water Co. Inc.
	3020	Goddher water to. Inc.
South Dakota (47)	3700	Randall Community Water Dist.
Tennessee (48)	3850	Cumberland Utility Dist.
	3900	Town of Big Sandy
	3940	
	3740	Arthur Shawanee Utility
	2060	Dist.
	3860	City of Barlett

.

<u>State</u>		Project number	Project name
		3960	Cross Anchor Utility Dist.
		3760	First Utility Dist. of Hardin Co.
		3930	City of Dunlap
		4040	Elbridge Water Assoc. Inc.
		3780	Lincoln Co. Board of
			Public Utilities
		4090	Tri-Cities Sullivan
			Utility Dist.
		4000	City of Savannah
		5980	Dekalb Utility Dist.
		4080	Tri-Cities Sullivan
			Utility Dist.
		3870	Fall Branch Utility Dist.
		3800	Town of Adamsville
		4110	HB & TS Utility Dist.
		4020 3910	Town of Puryear Utility Dist. of Southwest
		3910	Bedford
		3750	Town of Monteagle
		4100	Town of Spencer
		4030	Pleasant Valley Utility
			Dist.
		3890	Laguardo Utility Dist.
		3970	North Greene Utilities Inc.
		5970	Dekalb Utility Dist.
		4070	Northeast Robertson
			Utility Dist.
		3950	County Wide Utility Dist. of Crockett Co.
		3990	Town of Hornsby
		3880	City of Collinwood
		3920	West Warren Utility Dist.
		3730	City of Cumberland Gap
		4050	Town of Byrdstown
		5910	Town of Bell Buckle
		3770	Town of Hohenwald
		4060	Wolf Branch Utility Dist.
Texas	(49)	6550	Manville Water Supply Corp.
		6510	Bi County Water Supply Corp.

<u>State</u>	Project number	Project name
	4150 4380	Zephyr Water Supply Corp. Consolidates Water Supply Corp.
	6540 6520 4410	City of Nome Red River Auth. of Texas Southwest Milam Water
	4280 6490 4240	Supply Corp. Tempe Water Supply Corp. Dobbin Plantersville North Milam Water Supply
	4140	Corp. Mustang Valley Water Supply Corp.
	4130 4340	McCoy Water Supply Corp. Callisburg Water Supply Corp.
	6480 4330 6530	Birome Water Supply Corp. Coleman County Water Supply Maloy Water Supply Corp.
	4250 4390 4260	Men Water Supply Corp. Rock Hill WSC Wildorado Water Supply
	4270	Corp. Damascus-Stryker Water Supply Corp.
	4400	Salem Elm Ridge Water Supply Corp.
	4300 4310	El Sauz Water Supply Corp. Sharon Water Supply Corp.
	4420	North Runnels Water Supply Corp.
	4320	Bell Milam Falls Water Supply
	4370 4160	Tri-County Water Supply Corp. Westbound Water Supply
	4700	Corp.
Utah (52)	4470 4480	Town of Cannonville Town of Woodruff
Virginia (54)	5860	Buchanan County Public Service

State	Project number	Project name
	5840 6185	John Flannagan Water Auth. Dinwiddie County Water Auth.
	5300 5330 5290	Town of Virgilina Town of Fincastle Pulaski County Public Service
Washington (56)	4540 4600 4570 4520	Liberty Lake Sewer Dist. Town of La Conner Steptoe Sewer Dist. #1 Hockinson Water Assoc. Inc.
	4580 4530 4550 4560	Wallula Water Dist. #1 Town of Hartline Town of Spangle Walla Walla Water Dist. #2
West Virginia (57)	4650	City of Shinnston Lincoln Public Service Dist.
	4670 4700	Raleigh County Airport Auth. Mountain Top Public Service
	4690 4680	Dist. Lynco Public Service Dist. Clay Battelle Public Service
	4620 4610	Town of Kermit Chestnut Ridge Public Service Dist.
	4640	Silverton Public Service Dist.
Wisconsin (58)	4790	Town of Norway Sanitary Dist.
	6600	Village of Lake Nebagamon
	4800	Poy Sippi Sanitary Dist.
	4780 4750	Oakdale Sanitary Dist.
	4/30	Sand Creek Sanitary Dist. #1
	4770	Village of Endeavor
	4740	Village of Wyocena

State	Project number	Project name
	4825	Stone Lake Sanitary Dist.
	4870	Town of Lyndon Sanitary Dist.
	6640	Village of Curtiss
	6580	Drummond Sanitary Dist.
	4760	Village of Ridgeway
	4835	St. Joseph Sanitary Dist. #1
	4710	Village of Wheeler
	4840	Ashippun Sanitary Dist.
	6645	Village of Curtiss
	4830	St. Joseph Sanitary Dist. #1
•	4860	Town of Kossuth Sanitary Dist.
	6610	Jamestown Sanitary Dist. #3
	4820	Stone Lake Sanitary Dist.
	4810	Blenker-Sherry Jnt. Sanitary Dist.
	4730	Sanitary Dist. No. l Town of Lakeland
	6585	Drummond Sanitary Dist.
	4720	Town of East Troy Sanitary Dist.
Wyoming (59)	5780 5775	Town of Marbleton Sunburst Water & Sewer Dist.

APPENDIX IV APPENDIX IV

UNITED STATES DEPARTMENT OF AGRICULTURE

FARMERS HOME ADMINISTRATION
WASHINGTON, D.C. 20250

Mr. John Landicho
Associate Director
Community and Economic Division
U.S. General Accounting Office
Washington, DC 20548

May 27, 1977

Dear Mr. Landicho:

This is in reply to your letter of April 25, 1977, concerning your recent analysis of the Farmers Home Administration (FmHA) water and waste disposal grant program. You indicated that of the 650 projects receiving grants in fiscal year 1976, 429 were funded at less than the maximum amount allowable by law and FmHA regulations. You ask whether FmHA would be willing to make adjustments on those projects that were underfunded, where it is legally permissible to do so.

We are opposed to retroactively adjusting the grant amounts for those projects covered by your analysis for the following reasons:

- 1. Although the basic methodology and protocol used in the analysis resulted in the computation of a grant amount based strictly on a mechanical calculation, we do not believe consideration was given to the matter of priorities. FmHA regulations provide that State Directors will establish priorities for funding of applications based on the applications on hand and the availability of funds from the States' allocation. FmHA regulations do not require that the "maximum allowable grant" be made in every case. Also, there are other factors that affect the final determination of grant amount such as the availability of funds from other sources.
- 2. In a major portion of the cases covered by the analysis, the difference between the actual grant made and the "maximum allowable grant" as computed during the analysis is not substantial enough to warrant adjustment. Such a small increase in grant amount would not have a significant impact on the user payment for those users being served by the project and receiving the benefits of the grant. The basic goal of the program is to reduce user payments to a reasonable level for farmers, ranchers, rural residents, and other eligible rural users. We believe that after considering all funding on the projects covered by the analysis, this goal has been accomplished.

APPENDIX IV APPENDIX IV

3. Such a retroactive adjustment could set a precedent that would be difficult to change. By adjusting the grants for certain grant recipients covered by the analysis, other recipients may rightfully demand equal treatment. This could set in motion a process that could run for an undeterminable amount of time. To attempt to retroactively construct all the circumstances surrounding the negotiations between the recipient and FmHA at the time the grant offer was tendered and accepted by the grantee would be a difficult and time-consuming process. Project funding was based on full consideration of all the circumstances that existed at the time the grant was approved. All parties, including the applicant, agreed that a reasonable user cost had been achieved. We believe that it would place an unreasonable administrative burden on the Agency's resources to attempt such an adjustment.

Our foremost concern is that the benefits of the program be fairly and equitably distributed to all eligible communities desiring our assistance. We believe that our present grant program is being administered in such a manner.

Sincerely,

DENTON E. SPRAGUE

Acting Administrator

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