



Oregon's Drinking Water State Revolving Fund (DWSRF) Annual Report SFY2022

December 2022

Prepared by: OHA, Business Oregon and DEQ

Final version



Contents

Contents	2
I. Introduction	4
A. Progress toward short-term goals.....	5
II. Goals and accomplishments	5
B. Progress toward long-term goals	6
C. The public health benefits of investment in infrastructure	8
III. DWSRF loan and set-aside activities	9
A. Sources of DWSRF funding	9
1. Capitalization grants	10
2. State match	10
3. Interest earnings	10
4. Repayments and payments.....	10
B. Uses of DWSRF funds.....	10
1. Loan assistance status	10
a) Project bypass	10
b) Binding commitments	10
c) Small systems	10
d) Disadvantaged community systems	11
e) Loan Disbursements or Cash Draw Proportionality	11
f) Additional Subsidy	11

2. Set-aside activity status	11
Set-aside: Administrative expense	12
Set-aside: Small systems technical assistance	12
Set-Aside: State program management	13
Basic program activities.....	13
Set-aside: Local assistance and other state programs	15
Local assistance — Capacity Development	15
Local assistance — Implementation of Protection	17
IV. Additional financial information.....	19
A. Loan portfolio analysis.....	19
B. Financial statements.....	19
C. Project loan origination fees.....	19
V. Compliance with operating agreement and grant conditions.....	20
A. Conduct environmental reviews	20
B. Capacity development authority	20
C. Review of technical, managerial, and financial capability of assistance recipients.....	20
D. Take payments based on a payment schedule.....	20
E. Assure borrowers have a dedicated source of repayment	20
F. Federal Funding Accountability and Transparency Act (FFATA)	21
G. Disadvantaged Business Enterprise (DBE) – Minority Business Enterprises (MBE) and Women’s Business Enterprises (WBE).....	21
Appendix A: Annual (2022) funded project scope list	23
Appendix B: DWSRF Program Highlights (1997–2022) Pyramid	24

I. Introduction

Oregon Health Authority, Drinking Water Services (OHA) and Business Oregon are pleased to submit the annual report on Oregon's Drinking Water State Revolving Fund (DWSRF). This report is for the state fiscal year (SFY) of July 1, 2021, through June 30, 2022. Oregon's DWSRF program capitalizes the Safe Drinking Water Revolving Loan Fund (SDWRLF) program per Oregon Administrative Rule (OAR) 123-049.

Oregon provides this annual report to the U.S. Environmental Protection Agency (EPA), Region 10, to present Oregon's DWSRF activities. With help from the new EPA federal SRF data system, this annual report documents the work to achieve the goals and objectives of the set-aside activities and provides details as outlined in the Intended Use Plan (IUP) about:

- Loan fund activity
- Projects financed
- Loan interest rates, and
- Fund balances, etc.

Table 1 provides highlights of Oregon's SFY2022 project activities. Reference the annual (2022) funded project scope list in [Appendix A](#) and the program highlights pyramid in [Appendix B](#).

Table 1: Oregon's Drinking Water State Revolving Fund

Overview of new SFY2022 activities:

Total amount of committed and executed loans:
\$39,360,481

Total number of **new** projects funded: **30**

Total population served: **47,276**

New interest rates and terms:

Standard project loans – up to 30 years at **1.71%**
(avg. rate): **5**

Disadvantaged and non-disadvantaged community
project loans – up to 30 years at 1.0%: **11**

Consolidation projects that received 100% principal
forgiveness: **1**

Planning projects that received 100% principal
forgiveness: **11**

Emergency or environmental justice projects that
received 100% principal forgiveness: **1**

Prior award amendment projects (not new projects): **1**

Small System Equipment Assistance projects: **3**

Additional subsidies:

Loan forgiveness: **\$6,400,863 (30 projects)** Small
systems (<10,000 people) funded: **29**

Set-Aside activity disbursements:

Total amount of funds expended from all four set-
asides: **\$5,076,970**

II. Goals and accomplishments

A. Progress toward short-term goals

1. *Operate and manage a Safe Drinking Water Revolving Loan Fund in Oregon for eligible community and non-profit non-community water systems to construct needed improvements and meet security needs.*

Oregon's SDWRLF ("loan fund") continued to make loans during the reporting period, July 1, 2021 through June 30, 2022.

During this 12-month report period \$39,360,481 went to water system projects:

- A total of 30 new signed loan agreements, and
- Changes to existing assistance agreements (see Schedule D).

From SFY2020 and 2021 combined, Oregon saw an average decrease of 34% in projects according to recent data collected due to reduced assistance agreements. However, SFY2022 returned Oregon's project growth to record levels again. To date, Oregon has executed assistance for \$520,529,528 to 360 drinking water projects.

Since SFY2016, Oregon has maintained one combined (i.e., fundable and comprehensive) list of rated projects that seek financing in any stage of compliance with the amended 1996 Safe Drinking Water Act (SDWA). The current combined project priority list (PPL) contains 57 new and existing infrastructure (i.e., health and compliance and general and resilience) projects seeking approximately \$373,445,326 in financing to meet construction costs. This current combined PPL includes project data submitted with the 2021 and 2022 Capitalization Grants. Another \$165 million in funding requests was recently submitted for quarter one ending of SFY2023. These new projects will be considered for 2023 funding.

2. *Provide loan assistance to projects that will address the greatest public health need while accounting for project affordability, especially to help small systems and those serving disadvantaged communities.*

Oregon ranked drinking water system construction projects according to SDWA health risks and compliance issues. Water systems with major water quality compliance problems were given the highest rating points and placed at the top of the PPL. Oregon invited first to apply for planning, design, or construction loan funds water systems with the highest rating points. However, Oregon funded projects based on their readiness to proceed.

During SFY2022 disadvantaged communities continued to have access to interest rates as low as 1% and terms up to 30 years. Additionally, disadvantaged communities struggling with water rate affordability may qualify for up to an additional \$250,000 to \$500,000 or 50% (whichever is less) of the total award in principal forgiveness toward planning, design, or construction costs.

3. Develop technical assistance and source water protection efforts that sustain or improve the operation, maintenance, and management of Oregon's drinking water systems.

Technical assistance to small water systems serving fewer than 10,000 people continues to be provided through Oregon's Circuit Rider Program. For more information, see the small systems technical assistance set-aside section.

OHA continued to work with Oregon's Department of Environmental Quality (DEQ) to support local drinking water source protection projects. For more information about these activities, see the implementation of the protection set-aside section of this report.

B. Progress toward long-term goals

1. Administer the Safe Drinking Water Revolving Loan Fund in Oregon in a way that protects its revolving nature in perpetuity.

OHA has an Inter-Agency Agreement (IAA) with Business Oregon through June 2023. OHA also has an IAA with DEQ through June 2023.

During SFY2022, Oregon's loan fund made loans with interest in the range of 1% to 2% (on average). Therefore, the loan fund has continued to grow in perpetuity to benefit Oregon's water systems. Interest rates were awarded at 80% of the last [20-bond index rate](#) of the previous quarter as published in The Bond Buyer. Disadvantaged systems faced with water rate affordability concerns continue to receive an interest rate of 1% with terms up to 30 years.

EPA advised that both EPA and states were facing ever-increasing scrutiny regarding unliquidated obligations (ULO). States would be required to commit and expend DWSRF funds at a greater pace. Relevant examples included expediting the submittal of the DWSRF Capitalization Grant application. Also, awarding assistance agreements as soon as money becomes available. OHA and Business Oregon understand the significance of these concerns and continue to take measures to meet these requirements. For example, since April 2013,

Oregon's DWSRF program has kept a year-round Letter of Interest (LOI) process open for infrastructure-related projects to combat ULOs. Also, Oregon's DWSRF program implemented the Sustainable Infrastructure Planning Projects (SIPP) program to help plan and propel future infrastructure projects prioritized around smaller water systems. Oregon followed that up in 2016 with the ability for eligible public water systems to apply for eligible infrastructure projects that do not have any health or compliance issues. Lastly, in 2021 Oregon developed and launched the Small System Equipment Assistance (SSEA) program to help the smallest systems get the equipment they need. However, during SFY2022, the SSEA program was sidelined so Oregon's DWSRF program could focus

priorities around the new [Bipartisan Infrastructure Law \(BIL\)](#) funding that was signed in to law on November 15, 2021. Regardless, OHA and Business Oregon believe these additional programmatic upgrades:

- Have provided more options for eligible public water systems, and
- Assist Oregon's DWSRF program in meeting evolving ULO requirements while increasing our fund utilization rate.

For more information about DWSRF program updates, visit the OHA website at, healthoregon.org/srf.

2. *Support the state's goal of ensuring Oregon's water supplies provide safe drinking water by financially contributing to needed water system improvements.*

Program guidelines require water system loans to be made in order of need. The project priorities focus on:

- System health risk
- Compliance issues, and
- Affordability on a per household basis.

The program invites water systems at the top of the Project Priority List (PPL) to apply for project funds first. However, Oregon exercises a project bypass rule when necessary. If sufficient funds are available, Oregon may fund eligible projects that do not mitigate health- or compliance-related issues.

3. *Increase water system compliance with state and federal drinking water requirements through technical assistance, capacity development and assessment of source water.*

Oregon used local assistance set-aside funds to help water systems maintain compliance and improve their water systems through the Capacity Development program and the Implementation of Protection program. The Capacity Development program:

- Evaluated water system financial, technical, and managerial capabilities, and
- Outlined actions to maintain system viability.

OHA shared the workload with DEQ and continued to:

- Conduct source delineations, contaminant identification, and source susceptibilities for all public water systems, and
- Helped communities develop local drinking water protection programs.

4. *Develop and implement equivalency into Oregon's DWSRF program so that water system projects that are selected to comply with some federal crosscutters and federal requirements is minimized to only those projects equivalent to the annual federal award amount.*

During SFY2023, OHA and Business Oregon will begin developing equivalency plans for program implementation.

C. The public health benefits of investment in infrastructure

Waterborne diseases continue to present challenges to public health officials and water suppliers. Chronic exposure to chemical contaminants continues to present these challenges as well. The presence of disease-causing microorganisms in tap water typically results from poor source water quality, lapses in disinfection and filtration treatment process, or compromised distribution systems.

Ensuring that all Oregonians have access to safe drinking water remains our highest priority. Two important ways to meet this priority are through strong asset management practices and investments in drinking water infrastructure.

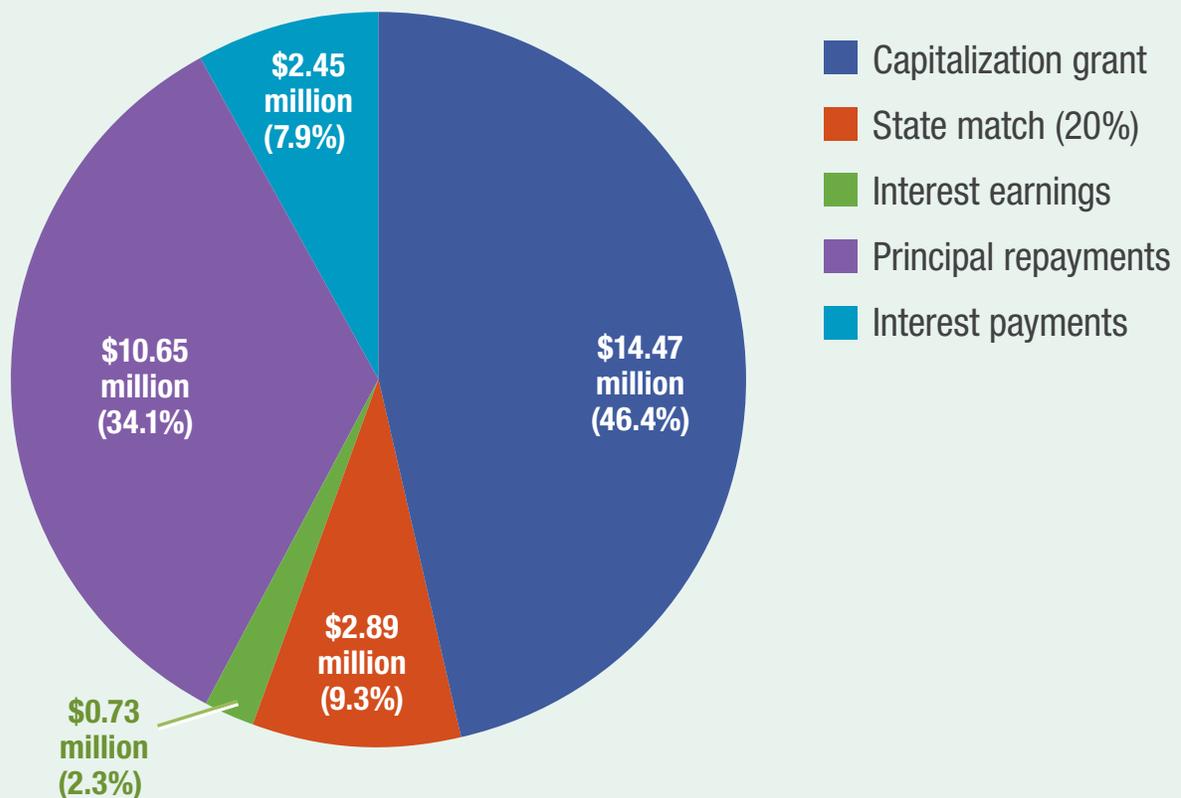
III. DWSRF loan and set-aside activities

This section of the annual report provides an overview of SFY2022 activities in the loan fund and set-asides.

A. Sources of DWSRF funding

Oregon’s loan fund continued to make project loans in SFY2022 using previous capitalization grant awards, state match, interest, and repayments.

Figure 1: New SFY2022 DWSRF Sources (\$31.19 Millions)



1. Capitalization grants

Oregon received its 2021 award during SFY2022. Cumulative grant awards received (SFY1998-2022) equal \$330,053,400 according to recent data collected.

2. State match

Oregon deposited the required state match (20%) of 2,894,800 during SFY2022 for the 2021 capitalization grant award totaling 14,474,000.

3. Interest earnings

Oregon received \$726,916 in interest earnings on investments in this reporting period.

4. Repayments and payments

Repayments received totaled \$10,651,112 in principal and \$2,449,963 in interest from loan payments. Both principal and interest were used to further capitalize the loan fund.

B. Uses of DWSRF funds

This section lists the loan fund and set-aside activities during SFY2022.

1. Loan assistance status

Oregon's loan fund entered into 30 new loan agreements and changes to existing assistance agreements totaling \$39,360,481. Loans ranged from below \$10,000 to \$8,030,000.

a) Project bypass

Of the 30 new projects funded during SFY2022, several infrastructure projects bypassed other projects on the PPL. These water systems passed the others due to their readiness to proceed and the communities acceptance to take on loans too.

b) Binding commitments

As of June 30, 2022, Oregon's overall project commitments (since inception of program in 1997) total \$520,529,528.

c) Small systems

The DWSRF requires that at least 15% of the loan fund be committed to small water systems. A small water system serves fewer than 10,000 people. Twenty-nine (29) of the 30 new projects funded during this reporting period were for small systems.

d) Disadvantaged community systems

Disadvantaged communities received loans at a reduced rate as low as 1% interest with an extended term of up to 30 years. A portion of a loan to a disadvantaged community may include additional principal forgiveness up to 50% of the total award, up to \$500,000. Thirteen (13) projects to disadvantaged communities made during SFY2022. Approximately \$4,994,722 in principal forgiveness was committed.

e) Loan Disbursements or Cash Draw Proportionality

Oregon disbursed a total of \$26,347,536 (per data system) to loan recipients in SFY2022. To meet proportionality requirements, Oregon made loan disbursements, using the required state match amount first, followed by federal funds, then state program funds (repayment and interest earnings).

This disbursement order intends to:

- Prevent improper payments
- Meet ULO targets, and
- Fully utilize all sources available in the fund.

f) Additional Subsidy

From the program's inception, additional subsidization in the form of forgivable loans have been provided to support drinking water infrastructure projects. In 2010, the EPA added a requirement to provide at a minimum 30% of the awarded capitalization grant as subsidy and named the congressional additional subsidy authority. Starting from 2010 this base requirement has adjusted depending on the grant year, which has been tracked by program staff at Business Oregon and reported into EPA's reporting software (i.e., NIMS) annually.

In 2016, an additional mandatory subsidy requirement was included to the grant award requiring that 30% of the subsidy awarded be allocated to state-defined disadvantaged water systems. The table provided demonstrates that, except for the current grant year, Oregon is on track to be in full compliance with meeting subsidy commitments, which are well in excess of the minimum requirements. Expenditures or subsidy are being tracked and will be updated as projects progress and expend loan funds on eligible activities.

See Attachment B – Schedule F to view the subsidy award summary.

2. Set-aside activity status

The following section is about set-aside activities of Oregon's DWSRF program for this reporting period. Financial statements, including set-aside funding availability and expenditures incurred during SFY2022, are in Attachment B to this report.

Set-aside: Administrative expense

This set-aside covered personnel salaries and costs to administer the DWSRF program in Oregon. Oregon relies only on the federal set-aside to administer the loan fund. Managing the loan fund and set-asides required the work of 4.80 FTE (full-time equivalent) – 1.00 in OHA and 3.80 for Business Oregon.

Key administrative activities included:

- Solicited construction projects at state-wide workshops.
- Developed, implemented, and managed a year-round, web-based LOI process.
- Allocated state repayment and earned interest funds to infrastructure projects.
- Evaluated public water systems for technical, managerial, and financial capacity.
- Submitted quarterly and annual reports in the following databases for EPA audits:
 - Project and Benefits Reporting (PBR)
 - DWNIMS, and
 - Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS).
- Attended and presented updates on the SRF program at quarterly DWAC meetings.
- Administered the state’s environmental review process (SERP).
- Completed IUPs and PPLs.
- Prepared capitalization grant applications.
- Developed loan tracking and financial tracking reports.
- Developed program policies and procedures.
- Trained loan fund staff on cross cutters and program regulations.
- Managed Oregon’s loan fund and set-aside programs.
- Managed funded projects from inception to completion.

All implemented goals or measurable activities suggested by this set-aside’s most recent work plan have been met or performed.

Set-aside: Small systems technical assistance

Oregon uses this set-aside to contract with technical assistance providers to bring improvements to small community water systems (fewer than 10,000 people). The contracts brought technically skilled circuit rider services to significantly noncompliant water systems and water systems experiencing temporary problems. This set-aside required 0.45 FTE during SFY2022.

During this year, our Circuit Rider program contractor continued to work with community groundwater and surface water systems.

The main work plan tasks completed by the technical assistance circuit riders statewide included:

- Preparing Resolution Plans that identify current deficiencies (if applicable) with the water system infrastructure or operation.
- Outline a detailed plan for resolving deficiencies.
- Complete a cost estimate of solutions.
- Providing on-site technical assistance troubleshooting in such areas as:
 - Bacteria detections
 - Repairing malfunctioning chlorinators or well pumps, and
 - Other water quality-related problems.
- Assistance in completing financing options and strategies for some systems.

Based on invoices paid, the contracted circuit rider made 94 technical assistance contacts during the reporting period.

All implemented goals or measurable activities suggested by this set-aside's most recent work plan have been met or performed.

Set-Aside: State program management

Funds from this set-aside augment the Public Water System Supervision Program through either a standard service contract or a statewide, multi-county Financial Aid Agreement (FAA). The OHA portion of the FAA is Program Element 50. It outlines the specific regulatory activities and related deliverables for each of the 26 participating counties and Oregon's Department of Agriculture.

The counties that work with smaller public water systems (populations of fewer than 3,300, using only groundwater) within their jurisdictions. The Department of Agriculture works statewide with drinking water systems operated by the facilities it licenses, such as a grocery-deli, and dairy and food processing facilities. Currently, 1,957 public water systems (EPA regulated only) fall within the contract agreements with the counties and the Department of Agriculture.

Basic program activities

The basic program activities under the FAA intend to help drinking water systems resolve water quality monitoring, reporting and other violations. Also, to complete preventive efforts such as sanitary surveys of water systems, alert investigations and provide technical consultation. See below for specific requirements.

- 1. Alert investigation** — Drinking Water Services issues a notice of drinking water contaminant detection referred to as an “alert.”
- 2. Water system surveys** — Drinking Water Services performs periodic, comprehensive, on-site evaluations of public water systems to identify and recommend corrective actions to prevent adverse effects on the quality of public drinking water.

3. **Enforcement action tracking and follow-up** — The contractor follow-ups with water systems under enforcement orders to verify the completion of all enforcement actions.
4. **Violation correction** — The contractor consults with water system operators to advise and ensure timely resolution of monitoring and reporting violations.

A summary of these four basic program activities is in the table below. Also, OHA posts this information on [Oregon Public Health Drinking Water Data Online](https://yourwater.oregon.gov/reports/srf.php) at <https://yourwater.oregon.gov/reports/srf.php>. OHA automatically updates the summary for the state fiscal year every July.

Activities summary (July 1, 2021 – June 20, 2022)

Basic program activities	Number reported
Alert investigations	980
Water system surveys	437
Enforcement action tracking and follow up	7
Violation corrections	249

State and federal funds provide for the funding of 6.0 FTE who perform state regulatory activities. OHA staff work on a wide range of managerial, technical, environmental and support activities. These activities include the five program activities covered by contractual agreements with partner agencies.

OHA-DWS staff (SPM set-aside)

FTE	Title
50%	Environmental Engineer 3
100%	Environmental Engineer 3
50%	Natural Resource Specialist 3
50%	Natural Resource Specialist 3
50%	Natural Resource Specialist 4
100%	Administrative Specialist 1
50%	Principal Executive Manager F
100%	Principal Executive Manager D
50%	Principal Executive Manager E
6.00	Total FTE

All implemented goals or measurable activities suggested by this set-aside’s most recent work plan have been met or performed.

Set-aside: Local assistance and other state programs

Oregon used funds from this set-aside for three programs:

1. Capacity Development.
2. Implementation of Protection.
3. Drinking Water Source Protection (grants and loans).

Capacity Development involves assessing the financial, technical and managerial capabilities of communities and non-profit non-community water systems. The program then assists those systems in need.

Implementation of Protection involves several activities to help communities and non-profit non-community water systems identify vulnerabilities to sources of drinking water. The program then recommends ways to protect its sources.

Drinking Water Source Protection (DWSP) provides financial aid through grants and loans to purchase land, easements, rights-of-way, and mitigation measures to protect drinking water sources.

Details about these programs for this reporting period are below.

Local assistance — Capacity Development

Oregon's Capacity Development program continues to be a fundamental part of the DWSRF program. Capacity Development program funding remains between 2% and 4% of the annual capitalization grant, the level endorsed by the Oregon Drinking Water Advisory Committee (DWAC). This set-aside supported 4.43 FTE in OHA for contracts and other related operating costs.

Oregon's Capacity Development program focuses on four areas:

- 1. Capacity Assessment program:** OHA conducted twelve DWSRF capacity assessments during the reporting period. OHA Drinking Water Services Technical Services Unit provides a capacity assessment for each water system receiving a DWSRF loan, with a concurrent financial capacity assessment performed by Business Oregon so needed capacity improvements can be written into the loan contract.

New public water systems added to the inventory were assessed during their initial plan review and approval process. OHA Drinking Water Services engineers facilitate these assessments by using a capacity assessment lens during the plan review process for each new public water system.

An internal process review determined that the capacity assessment form for new water systems should be revised. The review also noted that new water systems not requiring plan review are not marked for the capacity assessment process. A workgroup has been created to address these two issues. The revised procedures will be implemented in the coming year.

2. Capacity Development Information Services Program: OHA continually strives to communicate better with public water systems and managers. OHA also strives to provide the essential information water systems need to maintain compliance. OHA provides water system-related information on its website, this includes:

- Public access to OHA's Safe Drinking Water Information System (SDWIS) database
- A webpage specifically devoted to capacity development, and
- A training opportunities webpage.

Oregon also issues The Pipeline newsletter two to three times per year which provides information about:

- Upcoming rules and deadlines, and
- Operations and maintenance issues.

3. Capacity Development Training Program: Training opportunities are available on all levels for water system operators. The following training courses are provided regularly at no charge:

- Basics for Small Water Systems
- Conventional and Direct Filtration
- Essentials of Surface Water Treatment, and
- Slow Sand Filtration.

4. Capacity Development Outreach Program: Oregon continues to have great success with the DWSRF program and associated outreach activities. DWSRF loan funds are very beneficial. They provide a funding mechanism to water systems that might not otherwise be able to afford needed modifications, upgrades, and replacements of existing drinking water system infrastructure. Oregon's outreach activities to promote this program are accomplished through a variety of methods, including:

- Industry presentations
- One-Stop meetings
- Pipeline articles
- Postcard mailings and GovDelivery emails
- Routine updates to the DWSRF webpage
- Use of the Circuit Rider program to assist water systems in completing funding program LOIs
- Dissemination of the DWSRF program brochure during routine water system encounters, and
- DWSRF program signage at construction sites.

OHA continues its coordinated effort between the DWSRF program and its Compliance and Enforcement program. Together these programs review water systems on the Primary Non-Complier (PNC) list to identify eligible water systems to offer financial assistance to alleviate their compliance issues.

In addition to providing outreach with the DWSRF program, OHA assists water systems directly by:

- Funding a Technical Assistance Circuit Rider program. The program provides free contractors who perform quick response, one-on-one technical assistance that aids in solving short-term operational problems, assists with compliance-related issues, and provides technical, managerial, and planning information to system operators and administrators. The program also conducts Cryptosporidium and Microscopic Particulate Analysis (MPA) Monitoring.
- Integrating capacity building outreach into day-to-day drinking water program staff provide:
 - Direct assistance to water systems during sanitary survey activities
 - Water treatment plant inspections
 - Emergency response
 - Water quality investigations, and
 - Other associated technical consultation and outreach.
- Performing the Area-Wide Optimization Program (AWOP) activities described below.

The objective of Oregon's AWOP is to educate water system operators in optimization principles to improve public health protection. AWOP accomplishes this by:

- Imparting an understanding of the basics of water treatment and the multiple-barrier concepts
- Providing the opportunity and incentive to learn and engage in optimizing treatment beyond regulatory standards, and
- Using data to monitor performance and identify areas for improvement.

Local assistance — Implementation of Protection

Protection of a public drinking water source begins when the water system's Source Water Assessment Report (SWA Report) is used to develop local management strategies that minimize contamination risks associated with current and future land-use practices. When requested, water systems with a completed SWA Report receive assistance with:

- Development of source water protection strategies, and
- Source Water Protection Plans.

As of June 2022, a total of 342 community water systems (37% of Oregon’s community water systems) have “substantially implemented” a strategy to protect their drinking water. These 342 community water systems include many of Oregon’s larger communities and serve approximately 3,069,473 Oregonians, 86% of the estimated 3,583,427 Oregonians served by community water systems.

OHA assists water systems that rely on groundwater as their source of drinking water. OHA partner, DEQ, primarily assists water systems with surface water as their source of drinking water. The expertise of the two agencies allows the state to respond more capably to the differing needs of public drinking water systems based on their source of water. This set-aside supported 3.50 FTE in OHA.

Protection highlights for this period include:

- Fourteen additional community water systems achieved substantial implementation. Oregon SDWIS data suggests that the additional number of Oregonians protected by these water systems is 35,966.
- OHA and DEQ continued work on providing updated Source Water Assessment data to public water systems. DEQ is responsible for providing Updated Source Water Assessments to surface water systems. OHA is responsible for providing assessment updates to groundwater systems. During SFY2022:
 - DEQ has completed most surface water Source Water Assessment updates and is focused on maintaining GIS tools to assist OHA with the remaining groundwater Source Water Assessment updates and providing technical assistance to small groundwater systems.
 - OHA completed 153 Source Water Assessment update reports. To date, OHA has completed 671 Assessment updates for Community (C) and Non-Transient Non-Community (NTNC) groundwater systems, roughly 70% of those that need to be completed for C and NTNC groundwater systems.
- DEQ and OHA continue to promote the use of the [DWSRF for Drinking Water Source Protection grants and loans](#). Each year \$200,000 is set- aside to fund source protection projects. During the reporting period, nine LOIs for DWSP projects were received:
 - Six for surface water source protection projects, and
 - Three for groundwater source protection projects.
 - Of the nine LOIs the program received; the program recommended five projects for funding.
- Since January 2010, OHA has used Source Water Assessment Report data to identify groundwater sources that need to complete monthly source assessment monitoring under the EPA’s Ground Water Rule (GWR). Of the 565 water sources that have completed the monitoring requirement, 45 (8%) were identified as *E. coli* contaminated.

IV. Additional financial information

A. Loan portfolio analysis

Loan underwriting involves a variety of analytical elements. The analysis of these elements intends to limit the risk of default by the borrow and thus assure Oregon's DWSRF program that the loan will be repaid. Due to Oregon credit standards, Oregon's DWSRF program does not foresee problems with default risk in the loan fund. To date, all loan funds are paid as borrowers agreed on their loans.

B. Financial statements

Financial statements for SFY2022 were prepared by Business Oregon and OHA Central Accounting. They comprise Schedules A, B and C in Attachment B of this report.

C. Project loan origination fees

A 1.5% loan origination fee is now applied to DWSRF awards for non-disadvantaged communities. No loan fee revenue was received in the reporting period. Receipt and reporting fee revenue is expected for SFY2023 reporting.

V. Compliance with operating agreement and grant conditions

A. Conduct environmental reviews

OHA conducted environmental reviews of 14 projects during this reporting period. Those reviews resulted in issuing one findings of no significant impact and 13 categorical exclusion determinations. Details are in the SERP Report, Attachment A.

B. Capacity development authority

Oregon Revised Statute (ORS) 448.131 requires OHA to ensure all new public water systems commencing operations after Oct. 1, 1999, adequately demonstrate technical, managerial, and financial capacity following section 1420 of the SDWA.

C. Review of technical, managerial, and financial capability of assistance recipients

OHA and Business Oregon evaluated the technical, managerial, and financial capability of loan fund assistance applicants using EPA-approved criteria and processes. The agencies completed twelve reviews during this reporting period and approved all the projects.

D. Take payments based on a payment schedule

During SFY2022 Oregon continued to take payments based on eligible DWSRF activities performed monthly through the EPA Automated Clearing House (ACH).

E. Assure borrowers have a dedicated source of repayment

Business Oregon conducts a credit review on all applicants being considered for loan funds. This analysis determines whether an applicant can repay a loan. For every applicant, the expected revenue stream from user fees and other revenues offered must be enough to:

- Repay the loan
- Pay operation and maintenance costs, and
- Pay for other necessary expenses.

F. Federal Funding Accountability and Transparency Act (FFATA)

OHA and Business Oregon agree to enter relevant FFATA information into the FFATA Subaward Reporting System (FSRS) as required. FFATA reporting results will be shown in the report attachments, based on the newly issued EPA FFATA guidance. Reference Attachment B for SFY2022 FFATA results.

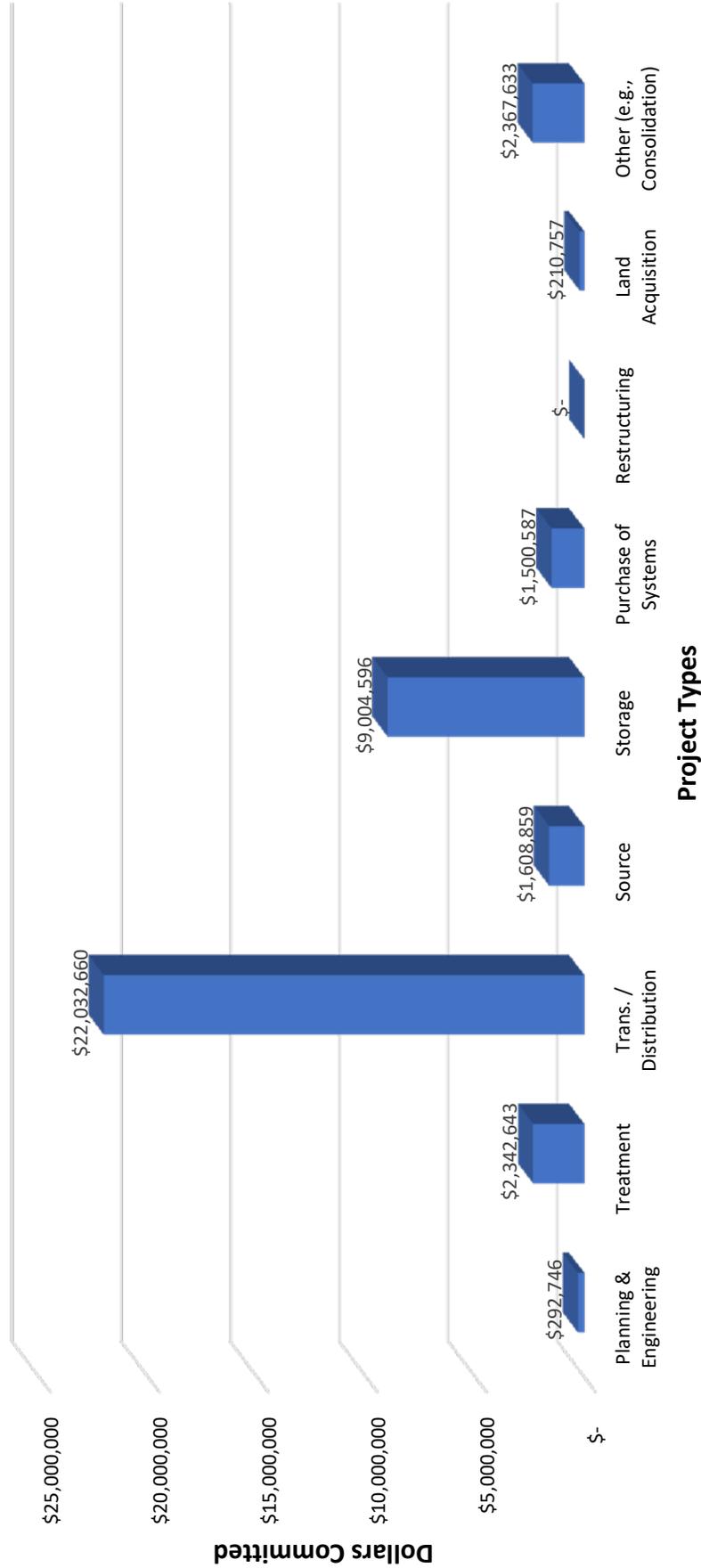
G. Disadvantaged Business Enterprise (DBE) – Minority Business Enterprises (MBE) and Women’s Business Enterprises (WBE)

OHA and Business Oregon agree to continue to track and report MBE and WBE disbursements and procurement activities based on our identified FFATA projects for each awarded grant phase. EPA Form 5700-52A will be submitted to our EPA partners to remain compliant with 40 Code of Federal Regulations (CFR), part 33 requirements.

page left intentionally blank

Appendix A: Annual (2022) funded project scope list

Annual DWSRF Project Type Totals (\$) (2022) \$39,360,481



Appendix B: DWSRF Program Highlights (1997–2022) Pyramid

Oregon's DWSRF Program Highlights (SFY1997-2022)



Infrastructure Projects:

- * Executed Assistance Total Amount = **\$520 million**
- * Executed Assistance Projects = **360**
- * Total Assistance Provided to Systems with ≤10,000 in Population = **91%**

Technical Assistance (TA):

- * Number of Systems Provided TA by Circuit Rider = **2,193**

Subsidies & Disadvantaged Communities:

- * Total Amount of Subsidies Provided to Projects = **\$82 million**
- * Total Number of Projects Funded to Disadvantaged Communities = **129**
- * Total Population Served (by the project) in Disadvantaged Communities Who Received Funding = **309,484**

Non-Compliant Systems:

- * Total Assistance Provided to Non-Compliant Systems Trying to Achieve Compliance = **\$266 million**
- * Total Population Served to Non-Compliant Systems Trying to Achieve Compliance = **1,353,372**

Other DWSRF Funding Programs in Oregon:

- * Total Amount Subsidized for the Sustainable Infrastructure Planning Projects (SIPP), (SFY2015-2022) = **\$2,257,853 to 115 projects**
- * Total Amount awarded (i.e., grant & loan) for the Drinking Water Source Protection (DWSP) Program, (SFY2008-2022) = **\$2.85 million**



PUBLIC HEALTH DIVISION (PHD)
Center for Health Protection (CHP)
Drinking Water Services (DWS)

Phone: 971-673-040
Fax: 971-673-0694

You can get this document in other languages, large print, braille or a format you prefer. Contact Drinking Water Services at 971-673-0405 or email info.drinkingwater@dhsosha.state.or.us. We accept all relay calls or you can dial 711.

Attachment A

Drinking Water State Revolving Fund Program

SFY 2022 Annual Report

ENVIRONMENTAL REVIEWS

State of Oregon
Oregon Health Authority
Public Health Division
Center for Health Protection
Drinking Water Services

State Environmental Review Process - SERP Environmental Review List of Projects

These SERP actions were taken on projects applying for financial assistance from the Drinking Water State Revolving Fund during this reporting period of 7/1/21 to 6/30/22.

PWS ID	Water System Name	SERP Action	Date
4100869	City of The Dalles	Accepted FNSI	8/4/2021
4100551	City of Myrtle Point	CE	8/11/2021
4100244	Crescent Water	CE	9/8/2021
4100003	City of Adair Village	CE	9/21/2021
4100149	City of Brookings	CE	9/24/2021
4100149	City of Brookings	CE	10/21/2021
4100164	City of Cannon Beach	CE	11/2/2021
4105108	Trollers Cove WA	CE	11/10/2021
4100259	City of Donald	CE	12/16/2021
4100837	Springfiled Utility Board	CE	12/10/2021
4101468	Whispering Pines MHV	CE	1/5/2022
4100712	City of Rogue River	CE	2/2/2022
4100582	City of Oakridge	CE	4/19/2022
4100041	City of Amity	CE	5/16/2022

Attachment B

Drinking Water State Revolving Fund Program

SFY 2022 Annual Report

OHA Central Accounting Documents (Schedules A, B & C)
OHA Supporting Tables (Schedules D, E & F)

State of Oregon
Oregon Health Authority
Public Health Division
Center for Health Protection
Drinking Water Services

SCHEDULE A
STATE OF OREGON
OBDD, OHA, DEQ
SAFE DRINKING WATER REVOLVING LOAN FUND
STATEMENT OF CASH FLOWS
FOR THE FISCAL YEAR ENDED JUNE 30, 2022

Cash Flows from Operating Activities

Payments to Employees for Services	(318,850)
Payments to Suppliers	(242)
Payments to Other Funds for Services	(9,847)
Distributions to Other Governments	681,574
Grant Receipts	13,930,656
Other Payments	(4,190,992)
Net Cash Provided (Used) in Operating Activities	<u>10,092,300</u>

Cash Flows from Noncapital Financing Activities

Principal Payments on Loans	(5,065)
Interest Paid on Loans	(1,667)
Transfers from Other Funds	12,198,373
Transfers to Other Funds	(9,737,797)
Net Cash Provided (Used) in Noncapital Financing Activities	<u>2,453,844</u>

Cash Flows from Investing Activities

Loan Principal Repayments	10,665,075
Loan Interest Received	2,453,509
Loans Made	(27,406,254)
Interest On Investments and Cash Balances	731,200
Interest Income from Security Lending	2,668
Interest Expense from Security Lending	(1,410)
Net Cash Provided (Used) in Investing Activities	<u>(13,555,213)</u>

Net Increase (Decrease) in Cash and Cash Equivalents	(1,009,069)
Cash and Cash Equivalents-Beginning	<u>128,027,738</u>
Cash and Cash Equivalents - Ending	<u>127,018,669</u>

Reconciliation of Operating Income (Loss) to Net Cash Provided (Used) by Operating Activities

Operating Income (Loss)	<u>8,168,595</u>
-------------------------	------------------

Adjustments to Reconcile Operating Income (Loss) to Net Cash Provided

(Used) by Operating Activities

Interest Receipts Reported as Operating Revenue	(2,453,509)
Net Changes in Assets and Liabilities and Deferred Inflows and Outflows of Resources:	0
Bad Debt	0
Accounts Receivable Federal	482,945
Due from Other Funds/Agencies	0
Interest Receivable	(636,998)
Loans Receivable	4,592,885
Net OPEB Asset	(10,002)
Prepaid items	0
Deferred Outflows of Resources Related to Pensions	6,990
Deferred Outflows of Resources Related to OPEB	576
Net Pension Liability	(126,874)
Net OPEB Liability	(565)
Total OPEB Liability	(2,698)
Accounts Payable	(6,603)
Due to Other Funds	(53)
Due to Other Governments	(22,500)
Deferred Inflows of Resources Related to Pensions	133,431
Deferred Inflows of Resources Related to OPEB	6,273
Employee Benefits and Vacation Payable	(39,593)
Total Adjustments	<u>1,923,705</u>
Net Cash Provided (Used) by Operating Activities	<u>10,092,300</u>

SCHEDULE B
STATE OF OREGON
OBDD, OHA, DEQ
SAFE DRINKING WATER REVOLVING LOAN FUND
STATEMENT OF REVENUES, EXPENSES, AND
CHANGES IN NET POSITION
FOR THE FISCAL YEAR ENDED JUNE 30, 2022

	<u>OBDD</u>	<u>OHA</u>	<u>DEQ</u>	<u>TOTAL</u>
Operating Revenues:				
Grant Income	-	13,447,712		13,447,712
Interest Income	3,090,507	-		3,090,507
Total Operating Revenues	<u>3,090,507</u>	<u>13,447,712</u>	-	<u>16,538,219</u>
Operating Expenses:				
Personal Services	248,572	-		248,572
Services and Supplies	10,312	-		10,312
Special Payments	3,865,011	-		3,865,011
Bad Debt	-	-		-
Administrative Expenses		193,948		193,948
Technical Assistance		284,721		284,721
State Program Management		2,403,260		2,403,260

Local Assistance/Other State Programs:				
Source Water Assessment Program				-
Implementation of Protection	428,708			428,708
Water Protection Projects				-
Implementation of Protection--DEQ			421,066	421,066
Water System Capacity Program	514,026			514,026
	<hr/>			
Total Operating Expenses	4,123,894	3,824,663	421,066	8,369,623
	<hr/>			
Operating Income (Loss)	(1,033,387)	9,623,049	(421,066)	8,168,595
Nonoperating Revenues (Expenses)				
Investment Income (Loss)	733,868			733,868
Other Interest Expense	(1,667)			(1,667)
Other Nonoperating Items	(1,410)			(1,410)
Other Grants	-			-
	<hr/>			
Total Nonoperating Revenue (Expense)	730,790	-	-	730,790
	<hr/>			
Income (Loss) before Transfers & Special Items	(302,597)	9,623,049	(421,066)	8,899,385
Transfers				
Transfers In from Other Funds (State Match)	2,894,800			2,894,800

Transfers In from OHA	9,201,982		421,066	9,623,049
Transfers Out to Other Funds	(9,086)			(9,086)
Transfers Out to DEQ		(421,066)		(421,066)
Transfers Out to OBDD		(9,201,982)		(9,201,982)
Change in Net Position	11,785,099	-	-	11,785,099
Net Position - Beginning	312,775,375	-	-	312,775,375
Prior Period Adjustments	397,132	-	-	397,132
Net Position - Beginning - As Restated	313,172,507	-	-	313,172,507
Net Position - Ending	324,957,606	-	-	324,957,606

These statements are unaudited.

SCHEDULE C
STATE OF OREGON
OBDD, OHA, DEQ
SAFE DRINKING WATER REVOLVING LOAN FUND
STATEMENT OF NET POSITION
June 30, 2022

	<u>OBDD</u>	<u>OHA</u>	<u>DEQ</u>	<u>TOTAL</u>
ASSETS				
Current Assets:				
Unreconciled Deposit	-	-	-	-
Cash and Cash Equivalents	127,747,328	(388,824)	(339,835)	127,018,669
Interest Receivable	2,609,084	-	-	2,609,084
Loans Receivable, Net	15,858,874	-	-	15,858,874
Securities Lending Collateral	742,459	-	-	742,459
Accounts Receivable Federal	-	542,451	-	542,451
Due from Other Funds/Agencies	101,687	81,443	384,938	568,068
Prepaid Items	-	-	-	-
Total Current Assets	<u>147,059,432</u>	<u>235,070</u>	<u>45,104</u>	<u>147,339,605</u>
Noncurrent Assets:				
Net OPEB Asset	11,503	-	-	11,503
Loans Receivable, Net	178,920,334	-	-	178,920,334

Total Noncurrent Assets	178,931,837	-	-	178,931,837
Total Assets	325,991,269	235,070	45,104	326,271,442
Deferred Outflows of Resources:				
Related to Pensions	99,168	-	-	99,168
Related to OPEB	1,260	-	-	1,260
Total Deferred Outflows of Resources	100,428	-	-	100,428
LIABILITIES				
Current Liabilities:				
Accounts Payable	1,798	133,383	45,074	180,254
Obligations Under Securities Lending	742,459	-	-	742,459
Payroll Payable	-	-	-	-
Due to Other Funds / Agencies	-	101,687	30	101,717
Compensated Absences Payable	11,360	-	-	11,360
Contracts, Mortgages, and Notes Payable	4,441	-	-	4,441
Total Current Liabilities	760,057	235,070	45,104	1,040,231
Noncurrent Liabilities:				
Compensated Absences Payable	16,875	-	-	16,875

Net OPEB Liability	0	-	-	0
Total OPEB Liability	4,710	-	-	4,710
Contracts, Mortgages, and Notes Payable	24,173	-	-	24,173
Net Pension Liability	179,830	-	-	179,830
Total Noncurrent Liabilities	225,588	-	-	225,588
Total Liabilities	985,646	235,070	45,104	1,265,819
Deferred Inflows of Resources:				
Related to Pensions	140,399	-	-	140,399
Related to OPEB	8,045	-	-	8,045
Total Deferred Inflows of Resources	148,444	-	-	148,444
NET POSITION				
Restricted Net Position for OPEB	11,503	-	-	11,503
Unrestricted Net Position	324,946,103	(0)	(0)	324,946,103
Total Net Position	324,957,606	0	0	324,957,606

These statements are unaudited.

Schedule D: NEW FUNDED / COMMITTED PROJECTS FOR SFY2022

Project Number	Water System	Loan Amount	Forgivable Loan	Primary Project Scope	Population Served	Small System (≤10,000)	Disadvantaged Community**	Is this a SIPP Project?
238-35	City of Salem	\$ 602,810	\$ 530,000	Consolidation of Sleepy Hollow water system	88	Y	Y	-
443-06	Heceta Water People's Utility District	\$ 6,240,089	\$ 530,000	Treatment, Distribution/Trans.	4,921	Y	Y	-
6609-03	Clarks Branch Water Assoc.	\$ 212,000	\$ 242,000	Distribution/Trans., Storage	140	Y	Y	-
5745-02	Tooley Water District	\$ -	\$ 20,000	Feasibility Study	42	Y	-	Y
6955-01	Lakewood Homeowners Inc.	\$ -	\$ 20,000	Feasibility Study	289	Y	-	Y
979-11	City of Haines	\$ 684,000	\$ 530,000	Distribution/Trans.	415	Y	Y	-
870-03	Christmas Valley Domestic Water	\$ 1,130,761	\$ 530,000	Distribution/Trans.	950	Y	Y	-
905-14	City of Adair Village	\$ 594,983	\$ 264,698	Distribution/Trans.	980	Y	-	-
3583-04	Panther Creek Water District	\$ -	\$ 20,000	Seismic Risk Assessment & Mitigation Plan (SRAMP)	620	Y	-	Y
6861-02	Crescent Water Supply & Imp District	\$ 446,073	\$ 476,072	Planning, Source	900	Y	Y	-
1563-03	City of Cannon Beach	\$ 288,000	\$ 298,000	Resiliency Project - Phase 1	1,710	Y	Y	-
6525-02	Johnson Creek Water Service Co.	\$ 3,945,178	\$ 280,000	Treatment, Storage, Source	363	Y	-	-
6921-01	Rainbow Rock Service Assoc.	\$ -	\$ 20,000	Feasibility Study	80	Y	-	Y
237-11	City of Rufus	\$ -	\$ 20,000	Feasibility Study	270	Y	-	Y
220-22	City of Oakridge	\$ 125,000	\$ 135,000	Source	3,225	Y	Y	-
871-08	City of Brookings	\$ 3,895,000	\$ 280,000	Distribution/Trans., Storage	7,120	Y	-	-
5724-03	Crystal Springs Water District	\$ 2,230,000	\$ 530,000	Consolidation of Odell water system	5,973	Y	Y	-
6934-01	Whispering Pines MHV	\$ -	\$ 333,629	Consolidation - connect to Charlotte Ann Water Dist.	120	Y	-	-
256-25	City of The Dalles	\$ 7,500,000	\$ 530,000	Distribution/Trans.	12,494	-	Y	-
5724-02	Crystal Springs Water District	\$ 1,603,700	-	Storage	same above	Y	Y	-
5747-01	Long Prairie Water District	\$ -	\$ 20,000	Master Plan	998	Y	-	Y
884-15	City of Rogue River	\$ 3,215,030	\$ 530,000	Storage	2,345	Y	Y	-
5247-01	Pleasant Valley Water Company	\$ -	\$ 20,000	Master Plan	900	Y	-	Y
6685-01	London Water Co-Op	\$ -	\$ 20,000	Feasibility Study	63	Y	-	Y
6861-01	Crescent Water Supply & Imp District	\$ -	\$ 20,000	Seismic Risk Assessment & Mitigation Plan (SRAMP)	same above	Y	-	Y
6888-01	Round Lake MHP	\$ -	\$ 20,000	Feasibility Study	250	Y	-	Y
977-02	Laurelwood Water Users Co-Op	\$ 241,850	\$ 133,650	Distribution/Trans., Engineering, Source, Land/Easement Acquisition	200	Y	Y	-
6864-01	Country Club Estates Water District	\$ -	\$ 12,350	UV Disinfection (<i>Small System Equipment Assistance</i>)	45	Y	-	-
6916-01	Dexter Oaks Co-Op	\$ -	\$ 8,377	Arsenic Removal (<i>Small System Equipment Assistance</i>)	75	Y	-	-
885-16	City of Gates	\$ -	\$ 19,587	Water Treatment Equipment (<i>Small System Equipment Assistance</i>)	500	Y	-	-
6278-04	Glide Water Association	\$ -	\$ 7,500	Leak Detection Study	1,200	Y	-	Y
Total		\$ 32,954,474	\$ 6,400,863	Total		47,276		
Drinking Water Source Protection (DWSP) (set-aside expenses ONLY)		\$ 150,843		DWSP grant/loan program awards/expenses 2022 DWSP Project Priority List		n/a	n/a	n/a
Drinking Water Source Protection (Repayment Fund Activities ONLY) ***		\$ 216,274						

* Per SFY2022 EPA's federal database (formerly NIMS & PBR), OHA & Business Oregon Records

** Funded planning and equipment projects (via SIPP & SSEA) are 100% forgivable loan. Disadvantaged status is not collected for these types of projects because they all receive 100% forgivable loan.

*** DWSP Repayment Fund Activities total, \$216,274 includes activities that OHA partners, Business Oregon, reimbursed project expenses using the DWSP project repayment fund. The repayment fund will be reimbursed by the 2022 DWSRF Grant Agreement/Award per our Local Assistance - DWSP set-aside activity work plan.

Schedule E

2021 FFATA Reportable Project List (including Set-Asides) for SFY2022

Applicant	Applicant Number	Amount
City of Beaverton	1000-13786	\$ 9,720,926
Set-Asides	n/a	\$ 4,753,074
FFATA Reportable Total:		\$ 14,474,000

SFY-2022 DWSRF FFATA Reportable *Set-Aside* Contracts ≥\$30,000 ONLY

Contracts		Contract # (if avail.)	Fiscal Yr. - not to exceed Contract Amount	FSRS Req?	Reason if not Req?
Circuit Rider (Civil West)		152746-1	\$ 975,000	No	Vendor Contracts are N/A
Counties* 7 of 26 contracts (Annual)	Clackamas	169503	\$ 53,091	Yes	
	Deschutes	169509	\$ 33,791	Yes	
	Jackson	169514	\$ 37,809	Yes	
	Josephine	169516	\$ 33,781	Yes	
	Lane	169519	\$ 50,325	Yes	
	Linn	169521	\$ 36,229	Yes	
	Marion	169523	\$ 42,797	Yes	
Dept. of Agriculture		169551	\$ 25,386	No	Federal entities are N/A
OAWU (\$5,965/class)		158366	\$ 596,500	No	Vendor Contracts are N/A
Needs Survey (HBH)		162617	\$ 233,558	No	Vendor Contracts are N/A
DWSP (Grants)	<i>Business Oregon to Manage (grants ≥\$25,000)</i>			Yes	
Only County Set-Aside FFATA TOTALS:			\$ 287,823		

PHD-PE50 Disclaimer:

All FSRS reported *Set-Aside* contracts shown above are to be associated to CFDA: 66.468 and FAIN: 98009020 & 98009021.

FFATA reporting threshold from March 1, 2011 through September 30, 2015 was \$25,000. Since October 1, 2015, the threshold became \$30,000 (Per OMB Guidance issued on 08/27/10; Prime Grant Recipient FFATA reporting threshold, remains at \$25,000).

Schedule F: Summary of Oregon SDWRLF Subsidy Awards

SRF/SFY	Cap Grant Amount	Base Subsidy Req.	Additional Subsidy Requirement	Subsidy Requirements Met?	Subsidy Awarded (\$)	Subsidy Awarded (%)	Subsidy Expended (\$)	Subsidy Expended (%)	SDWA Disadvantaged (\$)	SDWA Disadvantaged (%)	Mandatory Congressionally Authorized (\$)	Mandatory Congressionally Authorized (%)	Notes
2010	\$13,572,999	30-100%	N/A	Yes	\$ 9,789,350	72%	\$ 9,789,350	72%					20 projects
2011	\$9,418,000	30-100%	N/A	Yes	\$ 7,501,367	80%	\$ 7,067,095	75%					22 projects
2012	\$9,863,460	20-30%	N/A	Yes	\$ 2,959,038	30%	\$ 2,370,605	24%					15 projects
2013	\$8,421,000	20-30%	N/A	Yes	\$ 2,526,300	30%	\$ 1,464,690	17%					17 projects, 3 still drawing
2014	\$12,563,000	20-30%	N/A	Yes	\$ 3,589,464	29%	\$ 2,457,552	20%					28 projects, 4 still drawing
2015	\$12,480,000	20-30%	N/A	Yes	\$ 3,733,708	30%	\$ 3,714,500	30%					5 projects
2016	\$11,806,000	20-50%	0-30% Disadvan.	Yes	\$ 5,903,000	50%	\$ 3,618,405	31%	\$ 3,541,800	30%	\$ 2,361,200	20%	18 projects, 7 still drawing
2017	\$11,705,000	20-50%	0-30% Disadvan.	Yes	\$ 4,343,025	37%	\$ 3,805,556	33%	\$ 2,002,025	17%	\$ 2,341,000	20%	16 projects, 3 still drawing
2018	\$14,654,360	20-50%	0-30% Disadvan.	Yes	\$ 4,416,317	30%	\$ 3,967,777	27%	\$ 1,485,445	10%	\$ 2,930,872	20%	28 projects, 8 still drawing
2019	\$14,478,000	26-55%	6-35% Disadvan.	Yes	\$ 4,410,020	30%	\$ 3,375,460	23%	\$ 1,673,486	12%	\$ 2,895,600	20%	40 projects, 19 still drawing
2020	\$14,487,000	20-49%	6-35% Disadvan.	Yes	\$ 6,905,593	48%	\$ 822,661	6%	\$ 4,877,413	34%	\$ 2,028,180	14%	41 projects, 31 still drawing
2021	\$14,474,000	20-49%	6-35% Disadvan.		\$0.00	0%							Now allocating to this year
2022	\$9,220,000	26-49%	12-35% Disadvan.		\$0.00	0%							

End of Report

Page Left Intentionally Blank