

**NEW YORK STATE**

**Environmental Facilities Corporation**

**HARDSHIP POLICIES  
AND INCOME SURVEYS**

Community Assistance Teams

MARCH 25, 2026

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**AGENDA**

- **About EFC**
- **The State Revolving Funds (SRFs)**
- **Clean Water Hardship**
- **Drinking Water Hardship**
- **Income Survey Requirements**
- **Alternate Means**
- **Technical Assistance Opportunities**
- **Q&A**

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**ABOUT EFC**

**Clean Water State Revolving Fund** Low-cost capital for sewer and wastewater treatment projects. Short- and long-term financing with varied interest rates.

**Drinking Water State Revolving Fund** Low-cost capital for drinking water projects. Short- and long-term financing with varied interest rates.

**Water Grants** Ease the cost burden of capital infrastructure projects.

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**EFC: WE FUND NEW YORK STATE WATER INFRASTRUCTURE**

**Nation-Leading Investment**

**\$39.2 Billion**  
Provided to Wastewater Projects Since 1990

**\$10.6 Billion**  
Provided to Drinking Water Projects Since 1996

**\$3.4 Billion**  
EFC Water Grants Awarded to over 1,200 Projects Since 2015

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## TYPES OF FINANCING

- Short Term or Long Term
- Market Rate, Subsidized, or Interest-Free
- Financial Assistance

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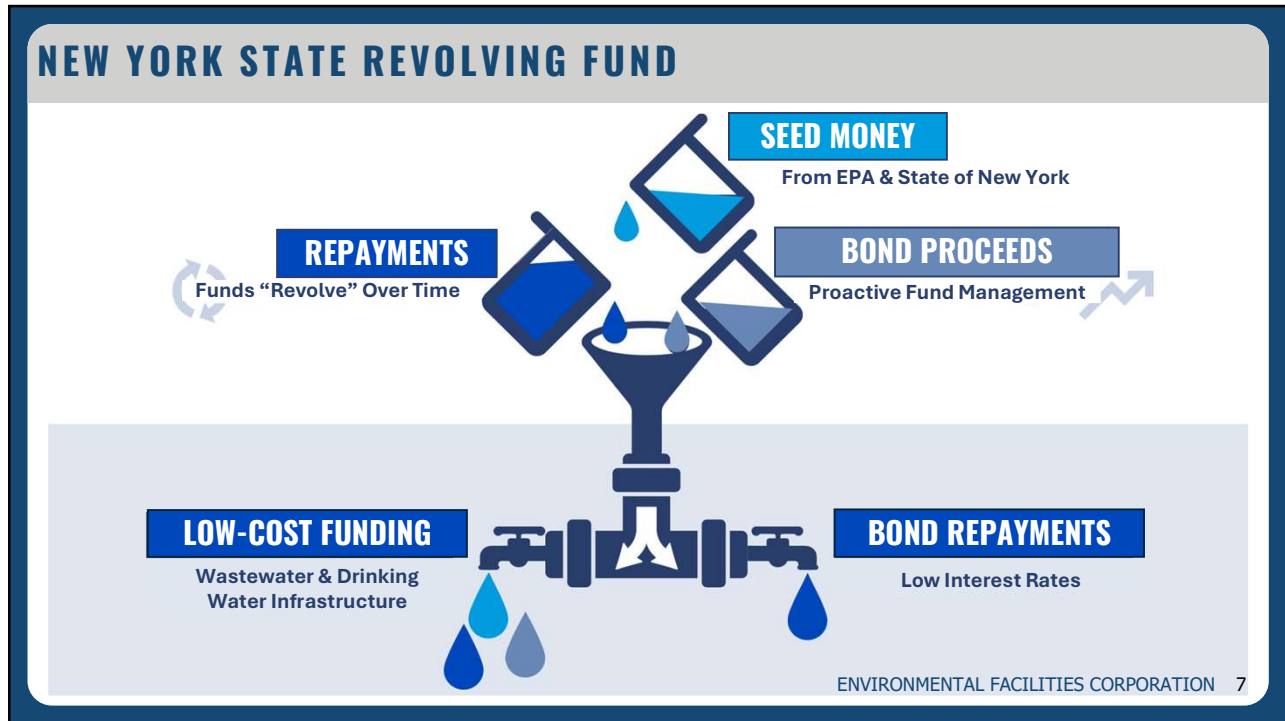
## TYPES OF FINANCING

### Market rate, subsidized, or interest free financing

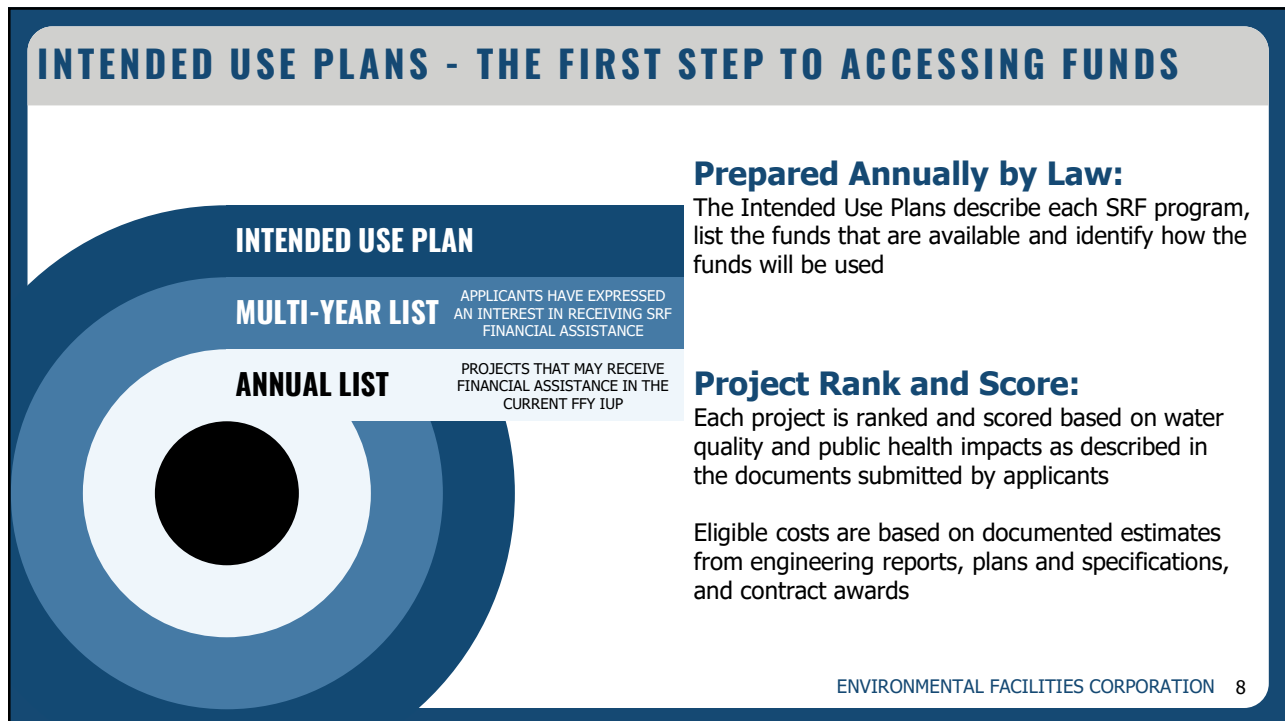
Market Rate	Subsidized	Interest-Free
Based on EFC's bond rating for projects with a score below the subsidy line.	<ul style="list-style-type: none"><li>33 1/3% interest rate reduction for drinking water projects</li><li>50% interest rate reduction for clean water projects</li><li>For projects scoring above the subsidy line</li></ul>	Financing for projects that qualify as hardship

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## ELIGIBLE ENTITIES CWSRF VS DWSRF

### CWSRF Eligible Entities

#### *Municipalities*

- Any county, city, town, village
- District corporation,
- County or town improvement district,
- School district,
- Indian nation or tribe recognized by the state or the United States with a reservation wholly or partly within the boundaries of New York state,
- NY public benefit corporation or public authority
- NY State agencies

### DWSRF Eligible Entities

#### *Financing*

- Community Water System
  - Municipality and privately owned
- Non-community Water Systems
  - Non-Transient Non-Community Water System
  - Transient Non-Community Water System

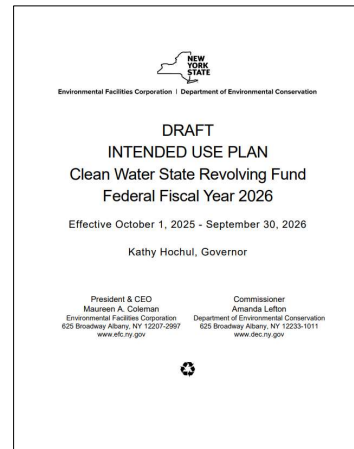
#### *Additional Subsidy and Interest-Free Financing*

- Municipalities (see CWSRF)
- Privately-owned systems regulated by NYS Department of Public Service

## CWSRF CATEGORIES

**On the Clean Water IUP, projects are listed and compete with similarly sized municipalities**

- **Category A**
  - Population is 3,500 or less
- **Category B**
  - Population is 3,501-2,000,000
- **Category C**
  - Population is more than 2,000,000



## CWSRF CATEGORIES

**In addition to municipality size, there are also categories for very specific types of projects**

- **Category D**
  - Project meets "Hardship" criteria, can qualify for interest-free financing
- **Category D1**
  - Additional subsidy funding through IIJA
- **Category EC**
  - Emerging contaminants funding through IIJA
- **Category G**
  - Green Innovation Grant Program funding



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## AMERICAN COMMUNITY SURVEY

The **American Community Survey (ACS)** is of comprehensive source of information such as population, housing, incomes and others used for many federal programs

- As an ongoing survey conducted by the U.S. Census Bureau since 2005, the ACS collects detailed social, economic, housing, and demographic information from a sample of households across the country
- DEC, EFC, and DOH use the municipal median household income (MHI) and poverty data to setup the "hardship" lines on the IUP
- These municipalities are then in Category "D"

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## CWSRF HARDSHIP - PROJECT CRITERIA

### The project must:

- Be a publicly owned wastewater treatment works project
- Be environmentally significant, as determined by the Commissioner of the Department of Environmental Conservation
- Not have a CWSRF short-term financing agreement that was executed before November 15, 2021
- Not have a long-term financing.



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## CWSRF HARDSHIP – MUNICIPAL CRITERIA

Less than 80% of regionally adjusted median household income (MHI)

**OR**

80% to less than 100% of regionally adjusted MHI **AND** poverty greater than statewide poverty (9.8%)

- Weighted MHI may be calculated and used for infrastructure owned in multiple jurisdictions
- Census Designated Place (CDP) may be used if significantly contiguous with service area

*\*\*The FFY 2026 IUP uses the 2023 American Community Survey (ACS) data\*\**

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## CWSRF HARDSHIP – MUNICIPAL CRITERIA

REGION	RCF	ADJUSTED MHI	80% OF MHI	100% OF MHI
Upstate	1.00	\$84,578	\$67,662	\$84,578
Dutchess, Orange, Putnam, Rockland, Sullivan, and Ulster Counties	1.28	\$108,536	\$86,829	\$108,536
Nassau, New York City (Bronx, Kings, New York, Queens, Richmond), Suffolk, and Westchester Counties	1.60	\$135,469	\$108,375	\$135,469

*Regional Cost Factor (RCF) is from 2024-2025 Regional Cost Factors from NYSED.gov Facilities Planning*

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## DWSRF HARDSHIP

### Hardship evaluation eligibility line

- Is established on the Annual List of the Intended Use Plan (IUP) in accordance with Disadvantaged Community Criteria.
  - Line changes annually depending on how much funding DOH has available.
- For FFY 2026, projects with a public health priority score of 115 or higher are evaluated for Hardship assistance (grants and/or interest-free financing).

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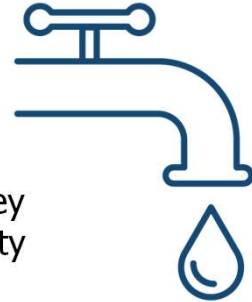
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## DWSRF IUP – HARDSHIP ELIGIBILITY

### Municipal Population

The municipality population must be:

- Less than 300,000 or
- If greater than 300,000, an acceptable income survey must be submitted for an established Town or County special assessment district that confirms the project service area population is less than 300,000
- *This requirements does NOT apply to IIJA-LSLR funding*



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## DWSRF IUP – HARDSHIP ELIGIBILITY

### Affordability Criteria

- Less than 80% of regionally adjusted MHI **OR**
- 80% to less than 100% of regionally adjusted MHI **AND** poverty greater than 9.8%



*\*\*The FFY 2026 IUP uses the 2023 American Community Survey (ACS) data\*\**

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## ALTERNATIVE MEANS

In certain circumstances, census data may not be reflective of the area served by the project or the population responsible for the debt incurred for the project.

In this case, an applicant may use alternative means to show that they meet the MHI criteria for hardship financing. There are 2 options for alternative means:

- ***Income survey***
- ***Ratepayer Impacts (CW only)***



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## INCOME SURVEY

Income surveys are used to establish an MHI different than the data from the ACS 5-year estimates. If conducted properly, it can be used by EFC for determining hardship and additional subsidy.

- Special Districts
- Areas missing census data
- Project area has different MHI than municipality
- Overlapping areas
- Eligibility for CDBG (separate criteria)



*Income surveys for different needs may need different data, so make sure to check early!*

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## EFC INCOME SURVEY - REQUIREMENTS

### *Who should be surveyed?*

- Conduct the Survey in the service area of the water supply or wastewater treatment project proposed for SRF financing
  - The geographic boundaries of the Survey must match the infrastructure project service area identified in the relevant engineering planning report.
- Survey only residential households
  - Residential households include single family homes and individual apartments in multi-family structures.
  - The following are **not** residential households: businesses, institutions, or non-residential entities

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## EFC INCOME SURVEY - REQUIREMENTS

### *What response is required?*

- Respondents to survey **must** be the owner/occupant or long-term tenant of the residential household.
  - In the case of seasonally occupied properties and second homes, respondents shall be the property owner and not a short-term renter/occupant.
- The Survey form must indicate that the Survey responses represent the average income of **all** occupants of a household, whether related or not, 15 years of age and older.
- A numerical response representing the actual income of each household surveyed must be solicited.
  - Surveys that allow respondents to choose from ranges of income on a Survey form will not be accepted.

**Municipalities must keep documents related to the organization and execution of the Survey**

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## EFC INCOME SURVEY - REQUIREMENTS

### *Minimum Response Rate*

Number of Households in Proposed Project Service Area	Required Minimum Percent (%) Return Rate
1 to 55	90
56-63	87
64-70	85
71-77	84
78-99	80
100-115	78
116 to 153	72
154 to 180	69
181 to 238	67
239 to 308	57
309 to 398	50
399 and greater	38

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## RATEPAYER IMPACT

### **Hardship financing may be provided to a recipient if they meet the following:**

- Demonstrate that the interest-free financing benefits individual ratepayers in the residential user rate class
- Demonstrate that such ratepayers will experience a significant hardship from the increase in rates based on the project being financing
- Ensure that the interest free financing is directed through a user charge rate system or other appropriate method to such ratepayers



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## HUD VS EFC INCOME SURVEY PROCESS

	CDBG (HUD)	EFC
<b>Purpose of Survey</b>	Determine if municipality meets MHI requirements	Establish alternate MHI to qualify for hardship
<b>Income Format</b>	Actual income / Income ranges	Write-in of actual income, average of all occupants
<b>Minimum Required Responses</b>	Statistical sampling based off of confidence and MOE	Fixed minimum return rate by household (see earlier)
<b>Household Age Collect Requirements</b>	18 years and older	15 years and older
<b>Confidentiality</b>	Strict de-identification	Results are summarized, no demographic data required
<b>Documentation</b>	Case management logs, outreach tracking, sampling documentation, must be retained by municipality.	Copy of survey & cover letter, parcel map, master list, certification

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## Need Help?

**The Community Assistance Teams offer one-on-one consultations and guidance**



**REQUEST A MEETING,  
SIGN UP FOR EMAILS, &  
REGISTER FOR WEBINARS**



**Contact the Teams**

(518) 408-3730

[efc.dl.CommunityAssistance@efc.ny.gov](mailto:efc.dl.CommunityAssistance@efc.ny.gov)

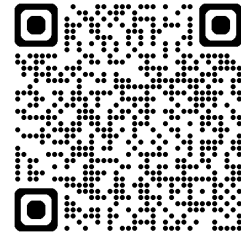
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## GET NEWS FROM EFC

### Sign up for our emails to be notified of:

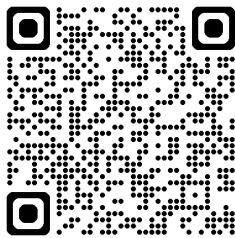
- Grant Announcements
- Webinars
- Events
- Deadlines



<https://lp.constantcontactpages.com/su/xJs1HzD/signup>

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<https://efc.ny.gov/>

## THANK YOU!

- ✓ [CWSRInfo@efc.ny.gov](mailto:CWSRInfo@efc.ny.gov)
- ✓ [design@health.ny.gov](mailto:design@health.ny.gov)
- ✓ [www.efc.ny.gov](http://www.efc.ny.gov)

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