

# Community Water System Accountability Rule

Act 98 of 2021 Legislative Session (R.S. 40:5.9 and 5.9.1)

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(LAC 51:XII Chapter 4)

7/30/2024

# Common Mistakes and Guidance to Improve Submittals

# For Systems that Do Not Charge for Water :

- A financial “plan” from the owner’s financial advisor that addresses or presents sustainability criteria for the long-term operations of the water system.
- A detailed letter stating
  - why they do not have meters or set a rate
  - where does the funding come from,
  - how does the legally responsible official (owner, president, etc) determine how much funding is needed for the water system to be sustainable,
  - how does the legally responsible official increase “rates” to continue compliant operation of the system,
  - how does the system budget for preventative maintenance, continued operations, emergency repairs, and long term master plan to improve the system.

# Federal or State Funded Systems:

- Provide a brief explanation of the funding for the system.
- Due to the unique ownership of the water system, explain
  - how the operation and maintenance of the public water system is determined in the annual operating funds,
  - how funding is secured and determined/prioritized for repair or replacement of infrastructure, etc.
  - Include information such as
    - proper budget controls,
    - adequate funding,
    - asset management formula for the budget,
    - process for securing funding,
    - process for funding in an emergency or unexpected event such as damage from a storm, aging storage tank replacement, repair and painting of storage tanks, etc.
    - Any audits that include information about the water system such as a federal audit.

# Common Reasons Points Deducted for Financial Sustainability

- Rate Study out of date.
  - Completed/implemented prior to 4/20/2019 for 2024 Grade Year
- Rate Study conducted, but not approved and implemented by the board.
  - Rate Study and Approval/Implementation by board was after 12/31.
  - Rate Study was not presented to the board.
  - The board did not implement the rate study, or implemented rates lower than those proposed by the rate study.
- Missing pages of the Rate Study. Incomplete document. Rate Study not signed by the entity completing the study.
- No implementation documentation.
- Financial Report, Audit, Annual Report did not include the entire document.
- Financial report, audit, annual report was out of date. Example: Fiscal year end 6/30/2023, submitted report for fiscal year end 6/30/2021, instead of 6/30/2022.
- Financial report, audit, annual report indicated a net loss, negative income, adverse opinion.
- Sustainability factor less than 1.0.
- Delinquent LDH drinking water fees.
- Uploaded wrong documents.

# Common Reasons Points Deducted for Customer Satisfaction

- Did not submit complaint log.
  - Work orders are not considered a complaint log.
- Uploaded the wrong document.
- Complaint log missing one or more of the required elements:
  - the date the complaint was received, the service connection which the complaint relates, the name of the customer or user making the complaint and associated contact information, a brief description of the complaint, and documentation of corrective actions taken to resolve the complaint.
- Complaint log was hard to decipher. Submitted on handwritten notebook paper, missing required information.
- Complaint log stated solution to every complaint was flushing with no information regarding what the underlying issue was.
- Complaint log covered multiple systems, but did not reference which system each complaint was assigned to.
- Submitted a statement – No complaints – but did not submit the complaint log.
- Complaint log has not information identifying which water system it is for or if it is being used by the system – blank complaint log titled example.