



**ANNUAL REPORT TO THE MAYOR
ON THE
TIERED
ASSISTANCE
PROGRAM (TAP)**

Department of Revenue

Calendar Year 2018

March 4, 2019



City of

Philadelphia

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1. EXECUTIVE SUMMARY

The City of Philadelphia has completed the first full year of the Tiered Assistance Program (TAP), its assistance program for residential customers who meet low-income or special hardship criteria. The initiative is a result of the enactment of Council Bill 140607-AA and rate determination by the Philadelphia Water, Sewer, and Stormwater Rate Board. TAP provides for participating customers' bills to be capped as a percentage of their income. Bills are capped at between 2% and 4% of their household income based on where their household income stands with respect to the current Federal Poverty Guideline. See Section 2.1 for a more detailed description of TAP.

The ordinance requires that the Department of Revenue submit a written report by March 31st of each year of activities undertaken pursuant to the ordinance. This document is the third such report and covers calendar year 2018. During the reporting period, the City completed a variety of activities to enhance customer access including: developing policies, operating procedures, and internal business processes, hiring and training staff, modifying the City's billing system to better accommodate TAP, and developing additional information technology resources to support customer application submittals and reviews. In addition, the City focused on key enhancements to improve customer access and the application experience. In its first full year, operations continued to evolve, in response to opportunities for greater efficiency and enhanced customer communication. We expect that as the program matures, we will gather additional feedback and data to further inform its ongoing administration.

BY THE NUMBERS

Philadelphia Code section 19-1605(7)(b)(.1-.4) specifies four types of metrics upon which the Department should report each year: Applicants Enrolled in TAP, Applicants Not Enrolled in TAP, Non-TAP Payment Agreements, and Customers Defaulting from TAP. **Between January 1 and December 31, 2018, the City had fully processed over 23,000 applications and had enrolled 13,413 customers in TAP. As of December 2018, there were 15,868 active TAP participants.** Together, TAP enrollees during 2018 had slightly over \$43.7M in water account arrears at the time of enrollment. In addition to those enrolled in TAP, there were 9,592 applicants not enrolled in TAP. This group includes 1) those who were placed in a program other than TAP because it was determined to be more affordable; and 2) those whose applications were denied (see [Figure 1](#)). During 2018, 292 customers defaulted from TAP for failing to successfully recertify.

Figure 1. 2018 Customer Assistance Application Outcomes (n = 23,005)

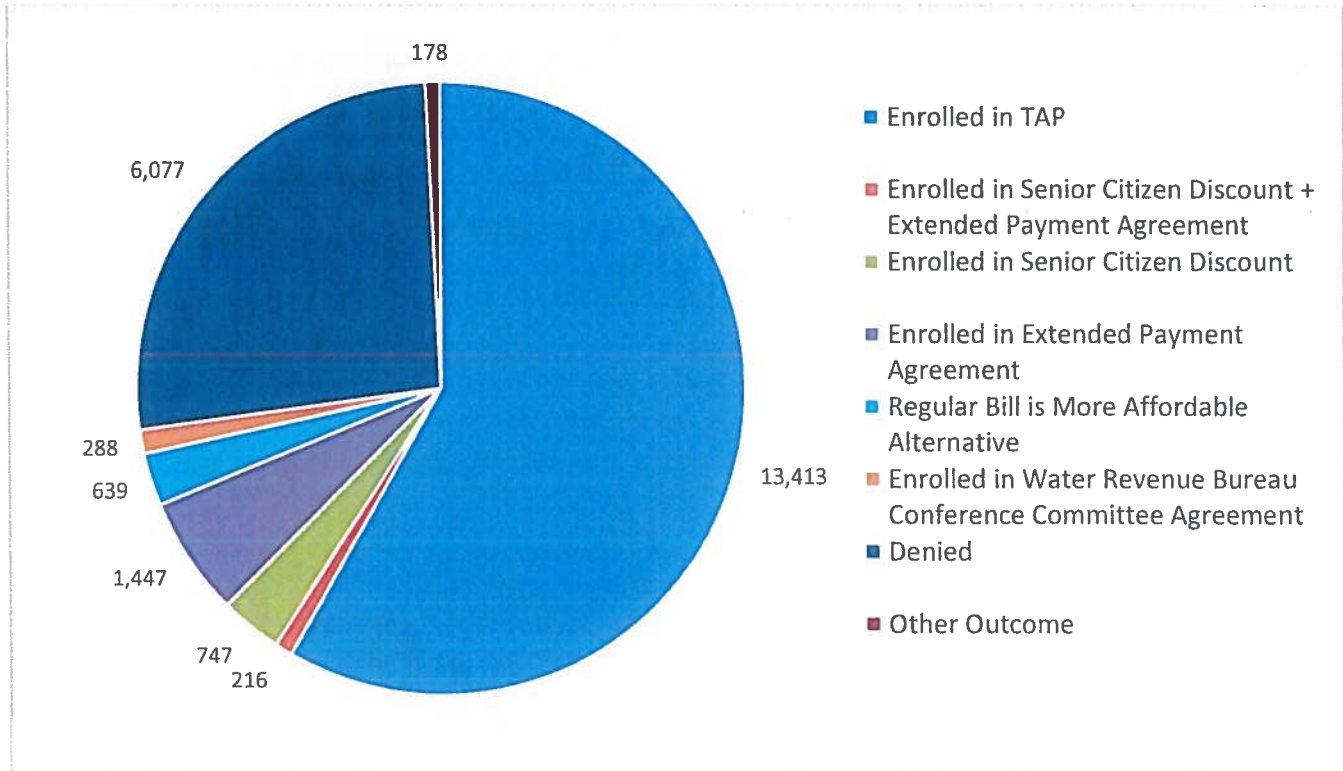
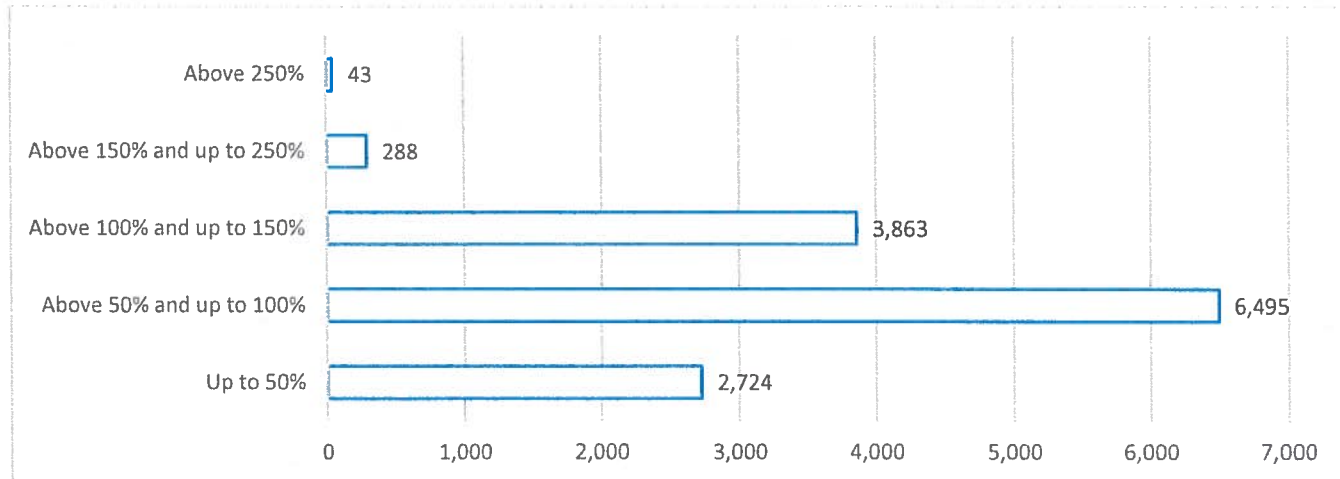
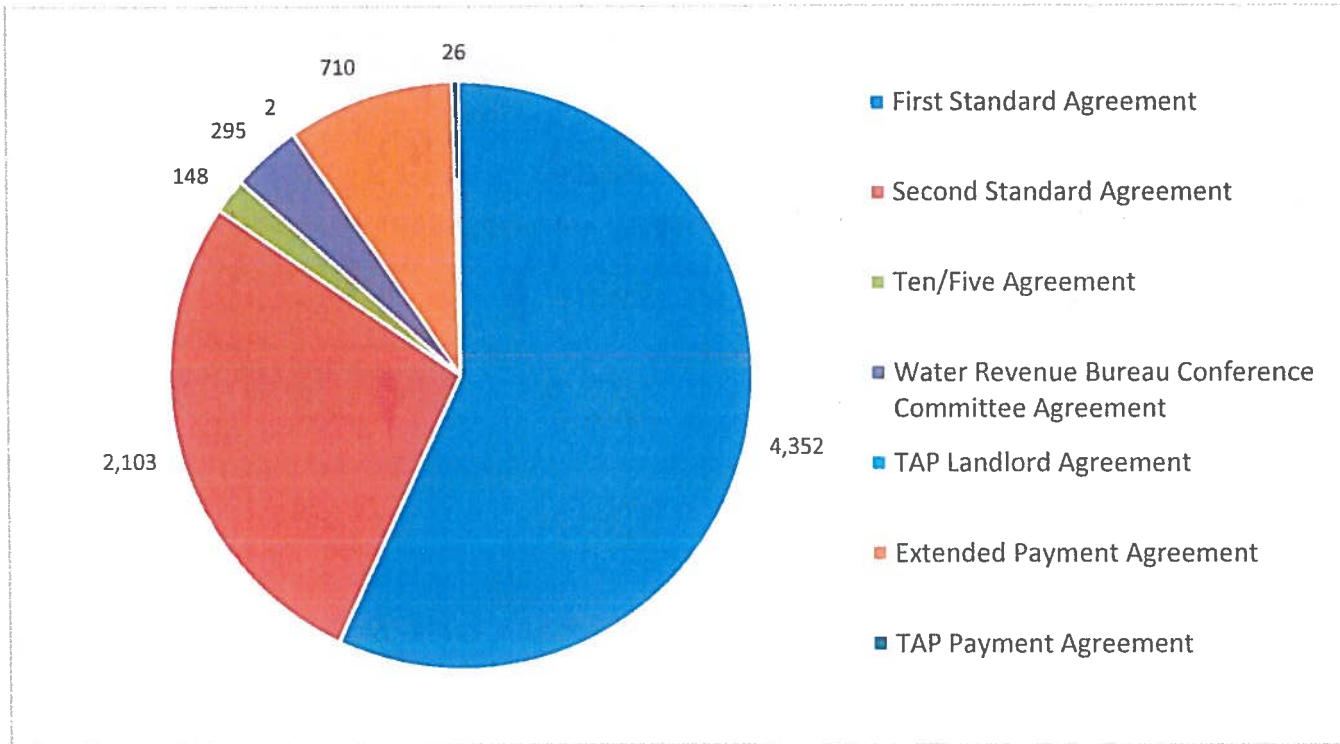


Figure 2. 2018 TAP Enrollees by Federal Poverty Guideline (n = 13,413)



In addition to TAP, this document also reports on non-TAP Payment Agreements between water customers and Revenue’s Water Revenue Bureau (WRB). **As of December 31, 2018, there were 7,636 active residential payment agreements.** Of these agreements, 7,038 agreements were created in 2018, while 598 agreements were created in previous years and were still ongoing. Active residential agreements created in 2018 cover just over \$9M in principal debt, \$1.2M in penalties and \$103,000 in other fees (such as returned check fees). See [Figure 3](#) below for a breakdown of all agreements by type. **As of December 31, 2018, there were 27,210 customers enrolled in the Senior Citizen Discount (SCD) program, some of whom were enrolled prior to the new customer assistance application process.**

Figure 3. Non-TAP Residential Payment Agreements Active as of December 31, 2018 (n = 7,636)



2. INTRODUCTION

In 2017, the City of Philadelphia successfully launched a new Tiered Assistance Program (TAP) for residential customers who meet low-income or special hardship criteria pursuant to Section 206.0 through 206.10 of the Philadelphia Water Department Regulations. At the same time, application and enrollment in other Customer Assistance Programs offered by the Water Revenue Bureau were streamlined into the very same process. During 2018, this comprehensive program has continued to grow as the City emphasized outreach, efficient administration, and enhancing the customer experience.

The TAP initiative is a result of two essential drivers. The first is Philadelphia Code section 19-1605, enacted in 2015. The second are the Philadelphia Water, Sewer, and Stormwater Rate Board's rate determinations in 2016 and 2018. In both documents mentioned above, TAP is referred to as the Income-Based Water Rate Assistance Program, or IWRAP. This document will use the program's operational name, TAP.

The ordinance requires the Department of Revenue to submit, by March 31st of each year, a written report to the Mayor – with timely copies furnished to the Council President and Chief Clerk of City Council – regarding activities undertaken pursuant to the ordinance that occurred during the previous calendar year. Section 19-1605(7) specifies metrics to be included as a part of this annual report, which are included in Section 4, below.

2.1 TIERED ASSISTANCE PROGRAM

TAP provides for participating customers' bills to be capped as a percentage of their income. Bills are capped at between 2% and 4% of their household income based on where their household income stands with respect to the current Federal Poverty Guideline. For monthly gross income limits based on household size for the calendar year 2018, see [Table 1](#) below.

- If a customer's household gross monthly income is at or below 50% of the federal poverty guideline, then monthly bills for water, sewer, and stormwater usage and service charges are fixed at 2% of the household income. The minimum TAP bill is \$12.00 per month. Any actual charges above the fixed amount are forgiven.
- If a customer's household gross monthly income is above 50% and at or below 100% of the federal poverty guideline, then monthly bills for water, sewer, and stormwater usage and service charges are fixed at 2.5% of the household income. Any actual charges above the fixed amount are forgiven.
- If a customer's household gross monthly income is above 100% and at or below 150% of the federal poverty guideline then monthly bills for water, sewer, and stormwater usage and service charges are fixed at 3% of the household income. Any actual charges above the fixed amount are forgiven.
- If the customer has a gross household income higher than 150% of the Federal Poverty Guideline and provides documentation showing existence of a special hardship within the last 12 months, then the customer may still qualify to participate in TAP.

Table 1. Federal Poverty Guidelines for 2018

Household Size	Maximum Gross Income (150% of FPL)	Maximum Gross Income (250% of FPL)
1 person	\$1,518 / month	\$2,529 / month
2 people	\$2,058 / month	\$3,429 / month
3 people	\$2,598 / month	\$4,329 / month
4 people	\$3,138 / month	\$5,229 / month
5 people	\$3,678 / month	\$6,129 / month
6 people	\$4,218 / month	\$7,029 / month
7 people	\$4,758 / month	\$7,929 / month
8 people	\$5,298 / month	\$8,829 / month
<i>For each additional person:</i>	Add \$540 to the amount above	Add \$900 to the amount above

If a customer qualifies for TAP based on a special hardship, monthly bills for water, sewer, and stormwater usage and service charges are fixed at 4% of the household income. Any actual charges above the fixed amount are forgiven. A special hardship can be:

- Increase in household size
- Loss of a job, lasting more than 4 months
- Serious illness, lasting more than 9 months
- Death of primary wage earner
- Domestic violence
- Other circumstances that threaten household's access to necessities of life

Customers are not required to have any back debt or any balance on their accounts to qualify for TAP. If customers do have back debt on their water accounts, that debt will be protected, meaning no enforcement action or collection activity will be taken on that debt while the customer is participating in TAP.

Additionally, when a customer requests an assistance application WRB provides a 14-calendar day stay of enforcement on their account up to three times within a 12-month time frame. (After the third request for an assistance application, the stay is no longer available.) A customer's back debt related to HELP loans or meter and repair charges are not covered under TAP. After 24 full TAP payments, a customer's pre-TAP penalties are forgiven.

2.2 2018 HIGHLIGHTS

In the early part of 2018, the City made critical enhancements to promote program access. WRB worked to efficiently leverage Real Estate Tax Owner Occupied Payment Agreement (OOPA) data in a more automated fashion for consideration in customer assistance applications. The software used by representatives to review customer assistance applications (Customer Application Management Program, or CAMP) is linked to the OOPA database and updated with new information daily, ensuring that reviewers are notified of the existence of an OOPA agreement and providing the relevant data in CAMP interfaces.

PWD, WRB, and several stakeholders participated in the effort to update the application form to further streamline and enhance customer understanding of the application process. The new application will be used beginning in mid-2019.

The City also focused on establishing an effective recertification process, since TAP enrollees can be required to recertify after they have been enrolled in TAP for at least 12 months. The recertification process includes automatic mailing of a new application, at least two pieces of communication with the customer, and sophisticated data sharing between CAMP and the billing system.

As a result of these efforts, large numbers of customers have applied for customer assistance and TAP enrollment has grown dramatically during the year. **Between January 1 and December 31, 2018, the City had fully processed over 23,000 applications and had enrolled 13,413 customers in TAP. As of December 2018, there were 15,868 active TAP participants.**

3. CUSTOMER OUTREACH AND SUPPORT

The City has continued to build upon the communications campaign established in 2017 to support the launch and implementation of TAP. In 2018, the focus was on customer awareness and the identification of application challenges through working closely with the City's TAP Advisory Committee.

Program advertising during 2018 took place in the following forms:

- Bill stuffers
- Social Media
- Distribution of Flyers and Fact Sheets to partner organizations and at public meetings
- Posters (English & Spanish) distributed to partner organizations and WRB payment centers
- Bus Shelter ads along Roosevelt Boulevard

PWD's Public Affairs Division also focused on in-person community engagement to promote awareness and encourage customer applications. In 2018, assistance programs were featured, and materials were distributed at over 100 meetings with civic partners, reaching over 6,000 residents. Additionally, the Department of Revenue's Outreach Team, which participates in more than 200 community events annually, promoted TAP in neighborhoods, enrolled customers at pop-up events co-hosted with City Councilmembers, and featured the program in its online and social media content.

Another focus of customer outreach during 2018 has been the City's senior citizen population. The Customer Assistance Division at WRB, which is the administrative unit responsible for processing customer assistance program applications, has taken the initiative to engage more directly with PWD's customers to increase enrollment. Partnering with the City's Department of Parks and Recreation, WRB held enrollment drives at seven Senior Centers, reaching over 140 seniors.

PWD and WRB have been preparing for a mailing campaign in early 2019 to reach customers currently enrolled in the Senior Citizen Discount (SCD) program, but who have not applied through the new streamlined customer assistance application. The campaign will encourage customers to apply for assistance through the uniform customer assistance program application process since TAP may provide a lower water bill.

PWD and WRB are also teaming up with the TAP Advisory Committee in addition to PECO, PGW and the PUC, to pilot Utility Assistance Fairs to help Philadelphia residents who live in areas of need to access benefits in a streamlined environment. Two fairs are scheduled for March 2019. In addition to PECO, PGW and the PUC, our partners include TAP Advisory members: Councilwoman Quinones Sanchez, UESF, CLS, BenePhilly and ECA.

The City strengthened its relationship with the Utility Emergency Services Fund (UESF), which now operates a hotline to help customers find in-person assistance with the TAP application process. The City maintains a website with all information relevant to the customer service application process. It can be viewed at www.phila.gov/waterbillhelp.

4. REPORTING METRICS

City Code Section 19-1605(7)(b) requires several metrics to be provided in this annual report, including:

1. The number of applicants enrolled in TAP, and a breakdown of such enrollments by income level, along with the gross amount of arrears calculated for these enrollees.
2. The number of applicants that were not enrolled in TAP and a breakdown of the reasons for their TAP ineligibility.
3. The number of non-TAP Payment Agreements and a breakdown of such payment agreements by type, term, and amount covered.
4. The number of TAP customers who defaulted during the applicable period and the reason(s) for the default.

Each metric is addressed in this section.

The first customers were enrolled in TAP beginning in July 2017. Since TAP customers must recertify after 12 months (at a minimum), recertification is already underway for a number of customers. The metrics in this section include customers who have applied as part of the recertification process.

4.1 APPLICANTS ENROLLED IN TAP

Between January 1st and December 31st, 2018, the City enrolled **13,413 customers in TAP**. Together, these enrollees had **slightly over \$43.7M in water account arrears** at the time of enrollment. For consistency between reports, water account arrears are labeled “Pre-TAP Debt.” **Table 2** shows the breakdown of these TAP enrollees in income ranges with respect to the Federal Poverty Guideline.

Table 2. New Applicants Enrolled in TAP in 2018

Income Level as Compared to Federal Poverty Guideline	Total Enrollees	Total Pre-TAP Debt ^{1,2}
Up to 50%	2,724	\$8,632,355.08
Above 50% and up to 100%	6,495	\$22,048,986.77
Above 100% and up to 150%	3,863	\$11,860,039.88
Above 150% and up to 250%	288	\$954,544.91
Above 250%	43	\$230,842.26
Total	13,413	\$43,726,768.90

Table 3. Total Debt of Applicants Enrolled in TAP in 2017

Debt Range	Total Enrollees	Total Pre-TAP Debt ^{1,2}
< \$0	132	\$(12,924.16)
\$0–\$200	2,168	\$162,604.27
\$200–\$500	1,617	\$555,390.01
\$500–\$1,000	1,762	\$1,276,884.45
\$1,000–\$2,000	2,064	\$2,994,799.81
\$2,000–\$5,000	2,865	\$9,441,017.57
\$5,000–\$10,000	1,788	\$12,654,161.50
\$10,000–\$20,000	817	\$11,003,854.44
\$20,000–\$50,000	192	\$5,117,072.80
\$50,000+	8	\$520,984.05
Total³	13,413	\$43,726,769.90

¹ Under the ordinance’s requirement to promptly review applications for changed circumstances, there are rare cases where the same customer was enrolled in TAP more than once in the calendar year. In those cases, only that customer’s most recent enrollment and associated debt are reported in Table 2 and Table 3. Since TAP is a program in which customers can recertify for continuous participation, Pre-TAP Debt as shown in the tables above may represent debt that was already protected from enforcement while the customer was previously enrolled in TAP. Thus, the debt is associated with the most recent enrollment, but it may not all be debt newly protected through TAP participation.

² The Total Pre-TAP Debt total excludes any customers with account credits at the time of enrollment (which are shown in the first line of Table 2).

4.2 APPLICANTS NOT ENROLLED IN TAP

In addition to the 13,413 applicants enrolled in TAP (see Table 2, above), 9,592 applicants were not enrolled in TAP. This group includes 1) applicants who were denied for ineligibility or incompleteness following a request for further information, and thus could not be processed; 2) those who were placed in a different program that represented a more affordable alternative than TAP; and 3) those whose applications had some other outcome causing it to stop being processed. These reasons are described in further detail in Table 4, below.

Table 4. Applicants Not Enrolled in TAP

Outcome	Count
Denied	
Failed to meet Income and Residency Guidelines	29
Failed to meet Income Guidelines (no Special Hardship)	685
Failed to meet Residency Guidelines	991
Installation Type Not Eligible for TAP	33
Missing or Invalid Income or Residency Documentation	3,743
Missing information on application form	516
Failed to prove Special Hardship	80
Total Denials	6,077
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill ⁴	747
Senior Citizen Discounted Bill + Extended Payment Agreement	216
Regular Bill ⁵	639
Regular Bill + Extended Payment Agreement	1,447
WRBCC Agreement	288
Total More Affordable Alternative Placements	3,337
Other Outcomes	
Customer Withdrew Application	11
Data Transfer ⁶	167
Total Other Outcomes	178

⁴ Senior Citizen Discounted Bill may also include a standard payment agreement. Standard agreements are reported in Section 3.3, below.

⁵ Regular Bill may also include a standard payment agreement. Standard agreements are reported in Section 3.3, below.

⁶ When customers had more than one application in progress at the same time, information was transferred to the newest application for processing, older applications were categorized as "Data Transfer," and were no longer processed. Similarly, previously denied applications were transferred for re-evaluation when WRB identified available OOPA information or the customer submitted additional required documentation after denial. The subsequent approvals or denials are also captured in these figures.

4.3 NON-TAP PAYMENT AGREEMENTS

As of December 31, 2018, there were 7,636 active payment agreements between residential water customers and WRB. Of these agreements, 7,038 (92%) were created in 2018, while 598 (8%) were created in previous years and were still ongoing as of the end of 2018. Residential agreements are categorized as one of seven types, some of which relate to TAP.

- 1) **First Standard Agreements:** First standard agreements are available to residential customers irrespective of income. Under a first standard agreement, a 25% down payment is requested from the customer.
- 2) **Second Standard Agreements:** Second standard agreements are available to residential customers irrespective of income. Under a second standard agreement, a 50% down payment is requested from the customer.
- 3) **Ten/Five (or 10% down, 5% per month) Agreements:** These agreements were available to residential customers who met income qualifications. There were no new ten/five agreements created during 2018.
- 4) **Water Revenue Bureau Conference Committee (WRBCC) Agreements:** WRBCC agreements were available to residential customers who meet income qualifications, were previously enrolled in the WRBCC program, and had WRBCC be the most affordable alternative or opted to remain in the WRBCC program.
- 5) **Extended Payment Agreements:** A new Extended Payment Agreement was introduced during 2017 to assist customers who were income-ineligible for TAP.
- 6) **TAP Payment Agreements:** These new agreements were created for customers to catch up on missed TAP payments.
- 7) **TAP Landlord Agreements:** TAP Landlord Agreements are agreements automatically created for TAP customers who switch from customer (owner) to landlord (with tenant customer) status. TAP Landlord Agreements are meant to be short-term solutions until a different agreement can be created for these customers, since landlords who are not occupying the property are not eligible for TAP.

The 7,038 active residential agreements created in 2018 were made up of 4,125 First Standard Agreements, 1,922 Second Standard Agreements, 287 Water Revenue Bureau Conference Committee (WRBCC) Agreements, 676 Extended Payment Agreements, 26 TAP Payment Agreements, and 2 TAP Landlord Agreements (See [Figure 3](#) above). Active residential agreements created in 2018 cover just over \$9M in principal debt, \$1.2M in penalties and \$103,000 in other fees (such as returned check fees).

[Table 5](#), [Table 6](#), and [Table 7](#) provide counts for active residential agreements as of December 31, 2018 by term range along with the principal, penalties, and other fees covered under the agreements. [Table 5](#) shows information for agreements created in 2018; [Table 6](#) shows agreements created before 2018; and [Table 7](#) shows all agreements (the sum of agreements shown in [Table 5](#) and [Table 6](#)).

As of December 31, 2018, there were 27,210 customers enrolled in the Senior Citizen Discount (SCD) program, some of which were enrolled prior to the new customer assistance application process.

Table 5. Active (as of 12/31/18) Residential Agreements Created in Calendar Year 2018

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12	2,644	\$897,787.03	\$40,580.95	\$2,638.12
13–24	1,163	\$1,107,951.46	\$100,204.52	\$10,881.76
25–36	172	\$418,467.89	\$62,081.98	\$6,154.98
37–48	63	\$288,878.64	\$32,634.06	\$3,430.21
48–60	83	\$484,155.29	\$125,186.55	\$7,220.16
Total First Standard Agreements	4,125	\$3,197,240.31	\$360,688.06	\$30,325.23
Second Standard Agreements				
0–12	1,033	\$526,332.01	\$33,903.46	\$2,963.14
13–24	528	\$515,232.98	\$53,200.56	\$6,579.16
25–36	157	\$335,787.86	\$62,467.86	\$5,987.25
37–48	104	\$299,817.90	\$69,169.71	\$6,001.63
48–60	100	\$444,630.15	\$105,312.61	\$7,823.00
Total Second Standard Agreements	1,922	\$2,121,800.90	\$324,054.20	\$29,354.18
WRBCC Agreements				
0–12	287	\$1,163,166.99	\$155,272.83	\$9,089.68
Total WRBCC Agreements	287	\$1,163,166.99	\$155,272.83	\$9,089.68
Extended Payment Agreements				
13–24	131	\$125,504.94	\$9,314.31	\$1,556.38
25–36	90	\$140,297.94	\$13,389.90	\$2,144.50
37–48	59	\$119,708.79	\$14,994.66	\$2,673.44
48–60	53	\$131,530.77	\$15,413.39	\$2,183.95
60+	131	\$125,504.94	\$9,314.31	\$1,556.38
Total Extended Payment Agreements	676	\$2,532,774.92	\$369,529.26	\$34,333.48
TAP Payment Agreements				
0–12	26	\$5,697.34	\$0.00	\$83.48
Total TAP Payment Agreements	26	\$5,697.34	\$0.00	\$83.48
TAP Landlord				
60+	2	\$5,196.10	\$0.00	\$40.00
Total TAP Landlord	2	\$5,196.10	\$0.00	\$40.00
Total of all Agreements	7,038	\$9,025,876.56	\$1,209,544.35	\$103,226.05

Table 6. Active (as of 12/31/18) Residential Agreements Created Before 2018

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0-12	1 ⁷	\$0.00	\$0.00	\$0.00
13-24	43	\$107,257.38	\$6,794.63	\$907.25
25-36	76	\$200,274.11	\$25,798.45	\$2,284.98
37-48	52	\$229,384.28	\$34,034.99	\$1,850.00
48-60	54	\$282,203.58	\$25,038.90	\$1,400.00
60+	1	\$5,020.91	\$4,115.33	\$80.00
Total First Standard Agreements	227	\$824,140.26	\$95,782.30	\$6,522.23
Second Standard Agreements				
0-12	-	\$-	\$-	\$-
13-24	21	\$30,992.54	\$3,614.20	\$400.00
25-36	52	\$117,100.25	\$21,880.57	\$1,472.74
37-48	60	\$214,426.05	\$32,117.19	\$1,666.78
48-60	48	\$223,763.06	\$39,716.60	\$2,358.82
Total Second Standard Agreements	181	\$586,281.90	\$97,328.56	\$5,898.34
Ten/Five Agreements				
0-12	-	\$-	\$-	\$-
13-24	2	\$1,051.34	\$28.66	\$10.00
25-36	8	\$5,182.61	\$454.17	\$50.00
37-48	14	\$12,940.87	\$1,308.43	\$160.00
48-60	121	\$351,598.27	\$39,440.78	\$2,685.69
60+	3	\$10,620.49	\$2,090.95	\$33.67
Total Ten/Five Agreements	148	\$381,393.58	\$43,322.99	\$2,939.36
WRBCC Agreements				
0-12	8	\$23,000.36	\$2,714.78	\$200.00
Total WRBCC Agreements	8	\$23,000.36	\$2,714.78	\$200.00
Extended Payment Agreements				
0-12	-	\$-	\$-	\$-
13-24	6	\$4,978.77	\$427.26	\$50.00
25-36	2	\$2,473.05	\$203.09	\$40.00
37-48	2	\$2,804.15	\$282.57	\$40.00
48-60	3	\$5,162.84	\$346.14	\$30.00
60+	21	\$93,145.05	\$16,728.36	\$1,125.95
Total Extended Payment Agreements	34	\$108,563.86	\$17,987.42	\$1,285.95
Total of all Agreements	598	\$1,923,379.96	\$257,136.05	\$16,845.88

⁷ This agreement had been fully paid off, but was still listed with an "Active" status as of December 31, 2018.

Table 7. Summary of All Active (as of 12/31/18) Residential Agreements as of December 31, 2018

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0-12	2,645	\$897,787.03	\$40,580.95	\$2,638.12
13-24	1,206	\$1,215,208.84	\$106,999.15	\$11,789.01
25-36	248	\$618,742.00	\$87,880.43	\$8,439.96
37-48	115	\$518,262.92	\$66,669.05	\$5,280.21
48-60	137	\$766,358.87	\$150,225.45	\$8,620.16
60+	1	\$5,020.91	\$4,115.33	\$80.00
Total First Standard Agreements	4,352	\$4,021,380.57	\$456,470.36	\$36,847.46
Second Standard Agreements				
0-12	1,033	\$526,332.01	\$33,903.46	\$2,963.14
13-24	549	\$546,225.52	\$56,814.76	\$6,979.16
25-36	209	\$452,888.11	\$84,348.43	\$7,459.99
37-48	164	\$514,243.95	\$101,286.90	\$7,668.41
48-60	148	\$668,393.21	\$145,029.21	\$10,181.82
Total Second Standard Agreements	2,103	\$2,708,082.80	\$421,382.76	\$35,252.52
Ten/Five Agreements				
0-12	-	\$-	\$-	\$-
13-24	2	\$1,051.34	\$28.66	\$10.00
25-36	8	\$5,182.61	\$454.17	\$50.00
37-48	14	\$12,940.87	\$1,308.43	\$160.00
48-60	121	\$351,598.27	\$39,440.78	\$2,685.69
60+	3	\$10,620.49	\$2,090.95	\$33.67
Total Ten/Five Agreements	148	\$381,393.58	\$43,322.99	\$2,939.36
WRBCC Agreements				
0-12	295	\$1,186,167.35	\$157,987.61	\$9,289.68
Total WRBCC Agreements	295	\$1,186,167.35	\$157,987.61	\$9,289.68
Extended Payment Agreements				
13-24	137	\$130,483.71	\$9,741.57	\$1,606.38
25-36	92	\$142,770.99	\$13,592.99	\$2,184.50
37-48	61	\$122,512.94	\$15,277.23	\$2,713.44
48-60	56	\$136,693.61	\$15,759.53	\$2,213.95
60+	364	\$2,108,877.53	\$333,145.36	\$26,901.16
Total Extended Payment Agreements	710	\$2,641,338.78	\$387,516.68	\$35,619.43
TAP Payment Agreements				
0-12	26	\$5,697.34	\$0.00	\$83.48
Total TAP Payment Agreements	26	\$5,697.34	\$0.00	\$83.48
TAP Landlord				
60+	2	\$5,196.10	\$0.00	\$40.00
Total TAP Landlord	2	\$5,196.10	\$0.00	\$40.00
Total of all Agreements	7,636	\$10,949,256.52	\$1,466,680.40	\$120,071.93

4.4 CUSTOMERS DEFAULTING FROM TAP

PWD Regulations Section 206.6(c), below, describes the reasons for which a customer may be removed from TAP.

In addition to removal from TAP pursuant to Section 206.6(a) and (b) of these regulations, a TAP Customer may be removed from TAP for submitting intentionally false enrollment or recertification information/documentation, unauthorized use of service (providing water for use at a location other than the Customer’s primary residence), failure to recertify upon request by WRB, or failure to accept and reasonably maintain free conservation services offered by the Water Department.

During 2018, there were 292 cases of TAP participants defaulting from TAP, all for failure to successfully recertify. The vast majority of applicants (244) did not respond to the recertification request, 26 were denied for cause, and 22 were enrolled in a more affordable alternative. [Table 8](#) below describes the outcome of these unsuccessful recertification applications. There were no defaults for reasons of submitting intentionally false information/documentation, unauthorized use of service, or failure to accept and reasonably maintain free conservation services. Customers who opted out of TAP or closed their water accounts are not included in these figures.

Table 8. Customers Defaulting from TAP

Outcome	Count
Did Not Respond	244
Denied	
Failed to meet Income Guidelines (no Special Hardship)	1
Failed to meet Residency Guidelines	3
Missing or Invalid Income or Residency Documentation	19
Missing information on application form	3
Total Denials	26
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill	3
Senior Citizen Discounted Bill + Extended Payment Agreement	2
Regular Bill	3
Regular Bill + Extended Payment Agreement	14
Total More Affordable Alternative Placements	22

5. CONCLUSION

During 2018, the City successfully continued administering a complex customer assistance program. Customer participation grew dramatically, in part as a result of ongoing outreach efforts. Participation levels are still demonstrating the public's interest in achieving affordable water bills, which are now a reality for thousands of customers.

During 2018, with the assistance of our partners, WRB has successfully **enrolled 13,413 customers in TAP**. Some of these customers are beginning their second year of TAP participation through the automatic recertification process. **As of December 2018, there were 15,868 active TAP participants.**

Ongoing efforts to foster public awareness of TAP's launch -- through marketing, outreach and government and community partnerships -- have yielded solid results to date. As we celebrated the program's first anniversary, application submissions and outcomes continue to point to a positive story, with growing enrollment numbers and significant savings for the City's eligible customers.