

An aerial photograph of Philadelphia, Pennsylvania, showing the city skyline with various skyscrapers and buildings. The Schuylkill River flows through the center of the image, with a highway and green spaces on either side. The text is overlaid on the river and city.

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

Department of Revenue

Calendar Year 2019

May 7, 2020



City of
Philadelphia

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1. EXECUTIVE SUMMARY

The City of Philadelphia has completed the second 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 Revenue Department 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 2019. During this reporting period, the City improved program access by including 8 additional language options for validation messages and responses to customers when applying for the program using the website. Also, the website provides a feature that allows users to retrieve and complete a saved partial online application.

The City also made great efforts to provide continuous training and production support to staff speaking with customers about the program and those managing the application process. As a part of ongoing training efforts, the customer disputes process was also improved to allow communication between various groups to operate smoothly. The City also improved communication regarding water conservation requirements by enhancing the letters sent out to customers with additional detail on process and specific requirements.

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, 2019, the City had fully processed over 23,000 applications and had enrolled 13,701 customers in TAP.** See Figure 1 for 2019 TAP Enrollees by Federal Poverty Guideline. **As of December 2019, there were 15,258 active TAP participants.** Together, TAP enrollees during 2019 had approximately \$39.7M in water account arrears at the time of enrollment. In addition to those enrolled in TAP, there were 9,650 applicants that were either placed in a program other than TAP because it was determined to be more affordable; or their applications were denied (see Figure 2).

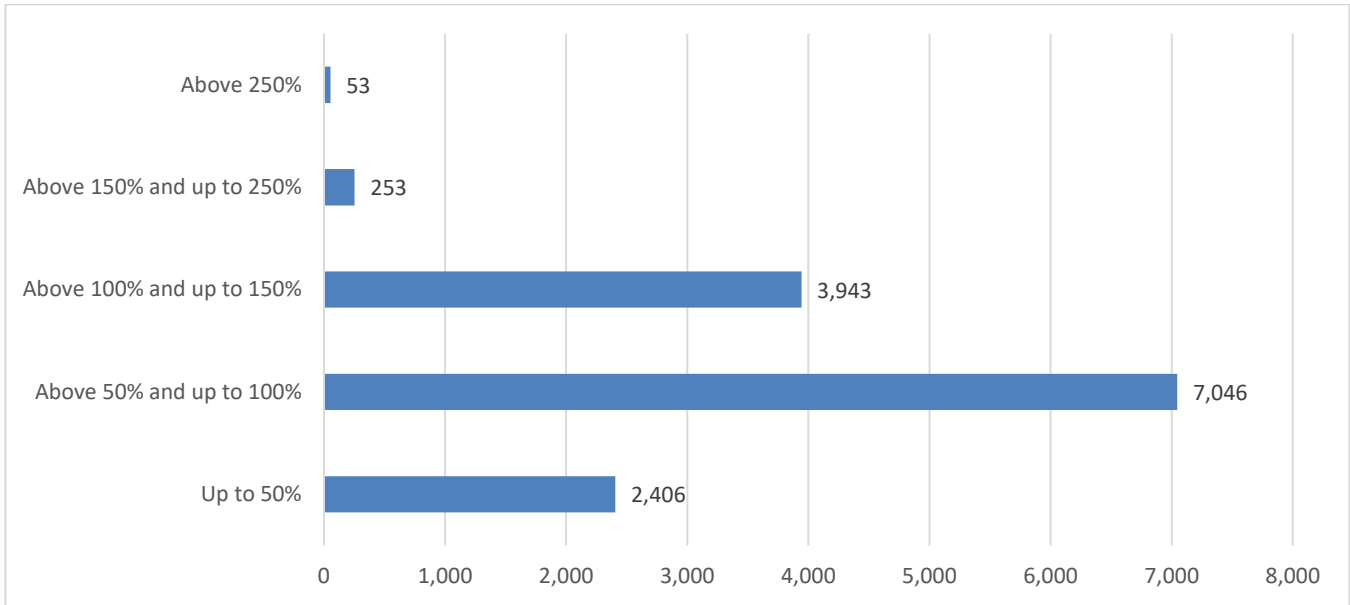


Figure 1. 2019 TAP Enrollees by Federal Poverty Guideline

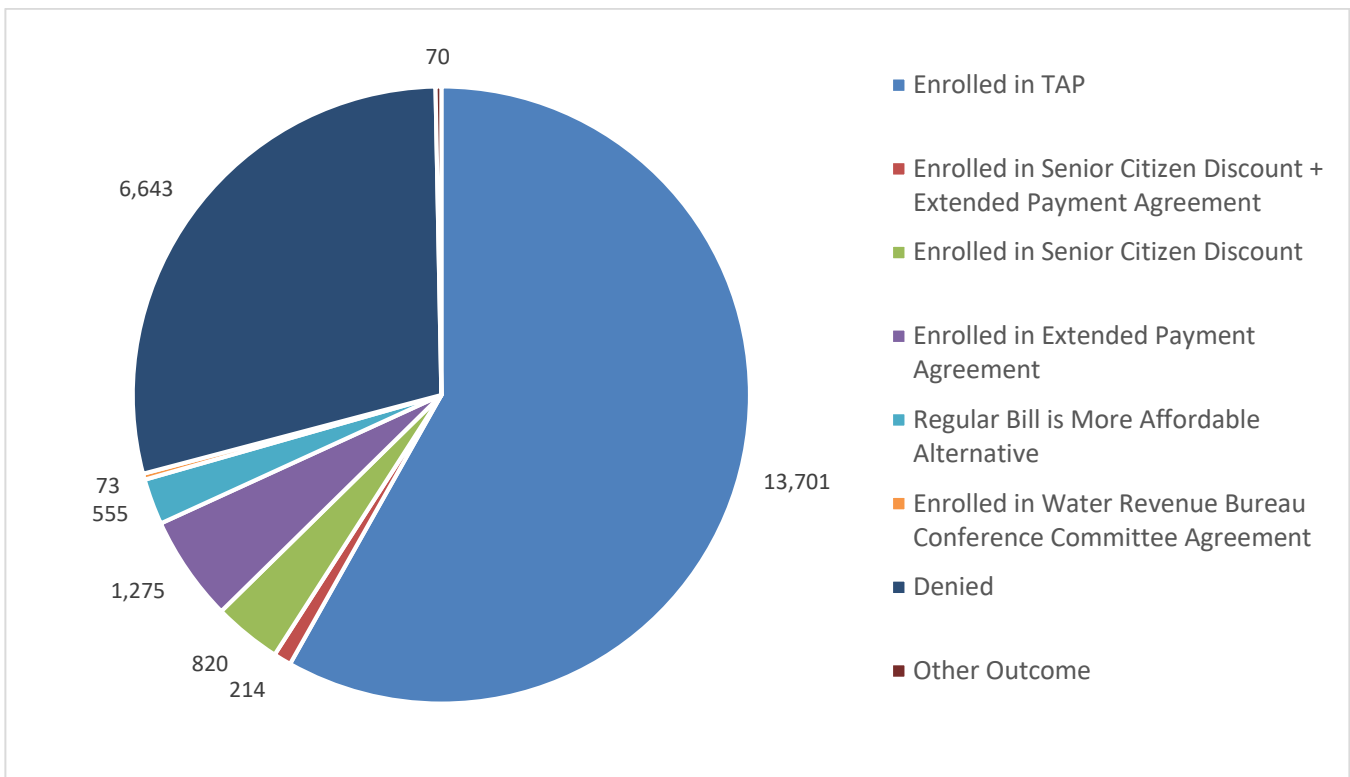


Figure 2. 2019 Customer Assistance Application Outcomes

In addition to TAP, this document also reports on non-TAP Payment Agreements. **As of December 31, 2019, there were 7,854 active residential payment agreements.** Of these agreements, 7,145 agreements were created in 2019, while 709 agreements were created in previous years and were still ongoing. Active residential agreements created in 2019 cover just over \$9.6M in principal debt, \$1.2M in penalties and \$175,000 in other fees (such as returned check fees). See Figure 3 below for a breakdown of all agreements by type. **As of December 31, 2019, there were 26,459 customers enrolled in the Senior Citizen Discount (SCD) program,** some of whom were enrolled prior to the new customer assistance application process.

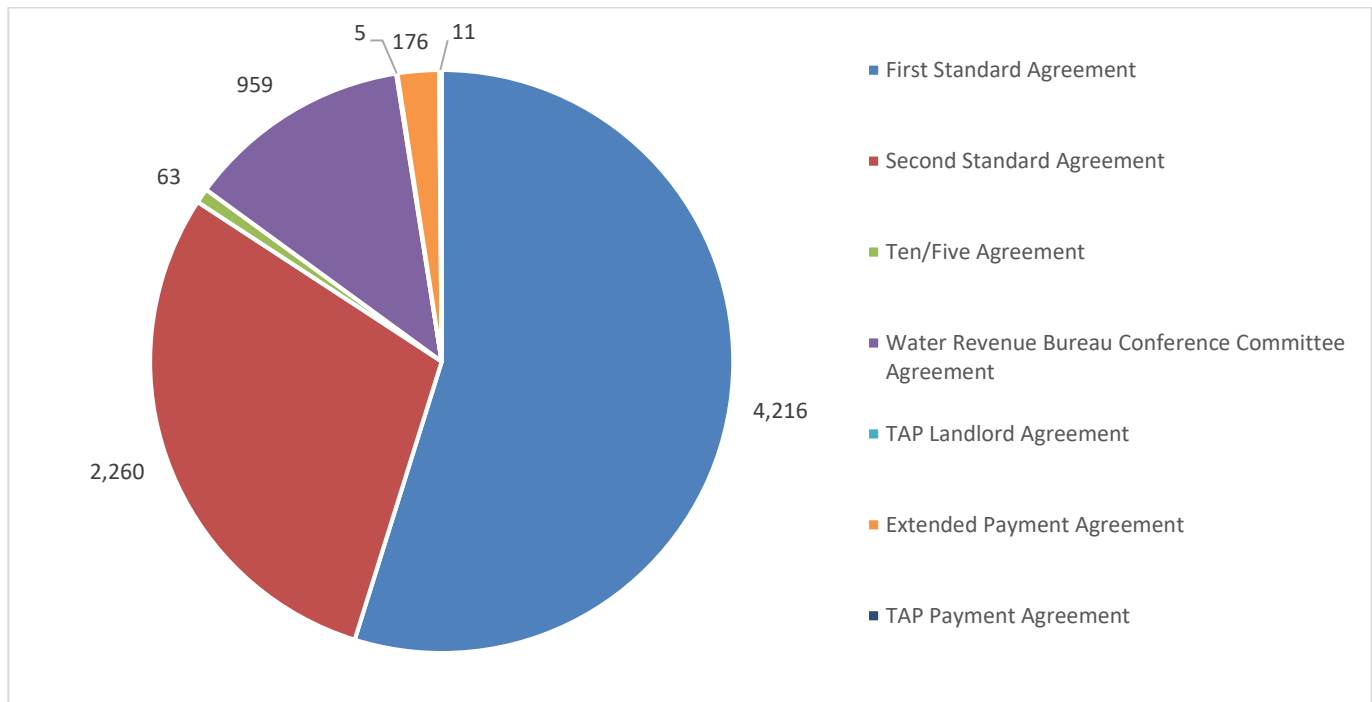


Figure 3. Non-TAP Residential Payment Agreements Active as of 12/31/19

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 2019, 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 Revenue Department 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 2019, 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 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 2019

Monthly Gross (pre-tax) Household Income and Potential Assistance Benefits		
Household Size	Maximum Gross Income (150% of FPL)	Maximum Gross Income (250% of FPL)
1 person	\$1,561 / month	\$2,602 / month
2 people	\$2,114 / month	\$3,523 / month
3 people	\$2,666 / month	\$4,444 / month
4 people	\$3,219 / month	\$5,365 / month
5 people	\$3,771 / month	\$6,285 / month
6 people	\$4,324 / month	\$7,206 / month
7 people	\$4,876 / month	\$8,127 / month
8 people	\$5,429 / month	\$9,048 / month
<i>For each additional person:</i>	Add \$553 to the amount above	Add \$921 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. Once enrolled, after 24 full TAP payments, a customer's pre-TAP penalties are forgiven.

2.2 2019 HIGHLIGHTS

In the early part of 2019, the City made significant enhancements to program access through collaborative planning, developing key processes and, implementing new policies to the program components including customer information security. In 2018, PWD, WRB, and several stakeholders initiated an effort to update the application form to further streamline and enhance the customer's ability to understand the application process. These improvements were continued into 2019 and a revised application went live in mid-2019. The updated version included changes to the cover letter, clarifications to refine the text in some of the customer responsibilities and, simplifying questions within the application.

In 2019, eight languages were added to messages on the application website to clearly instruct users in the process of requesting or completing an application in a different language. Spanish-language copies of incomplete application notification letters were also included as an additional method of improved accessibility and communication for customers to provide documentation.

Later in the year, the ability to save partially completed applications was added to the online application process. This feature allows customers the ability to save completed work in the middle of the application process and return to the same application at a later time. Significant measures were taken to ensure that this process worked as smoothly and securely as possible. As a result, customers are only able to access previously saved applications, which contain personally identifiable information, by using the following three points of data: Water Access Code, Customer Zip Code, and Application ID. This information is communicated to the customer through separate channels as a security measure.

During 2019, a significant amount of planning and design work was performed to enhance the recertification process. Based on improvements identified in consultation with key stakeholders, the recertification process

will be enhanced with the addition of an online recertification process that is planned to become available in 2020. Currently, customers were only able to recertify for the program by using a paper application. When the ability to recertify online becomes available, customers will have both options. The recertification process has been in operation since 2018 and will continue to be further improved and refined throughout 2020.

Ongoing training and “Town Hall” meetings were held throughout the year to maintain communication and exchange knowledge among all involved groups, including the PWD Contact Center and the WRB Customer Assistance Division. These meetings provided a consistent opportunity to discuss updates in both the program software as well as program policy.

Additionally, changes were made to the disputes process to make it easier for customers to follow up regarding TAP decisions. PWD and WRB also prioritized the water conservation efforts as outlined in the Customer Responsibilities of the program. This included developing reports to identify customers who exhibit high usage or who have experienced a spike in water usage and are therefore candidates ripe for water conservation measures. This effort is a part of the conservation assessment process, which works to preserve the integrity of TAP.

As a result of these efforts, the number of customers who have applied for customer assistance and TAP enrollment has continued to grow during the year. **Between January 1 and December 31, 2019, the City had fully processed over 23,000 applications and had enrolled 13,701 customers in TAP. As of December 2019, there were 15,258 active TAP participants.**

3. CUSTOMER OUTREACH AND SUPPORT

The City has continued to identify and implement effective ways to improve communication with the customer base. In 2019, the focus was on improving the clarity and effectiveness of current communication efforts. Several customer communication letters were created or updated to accommodate new program features. Additionally, some existing letters were modified to provide clearer communications to our customers.

PWD and WRB began a mailing campaign in 2019 to reach out to over 16,000 customers currently enrolled in the Senior Citizen Discount (SCD) program, who have not applied through the new streamlined customer assistance application. The campaign encouraged customers to apply for assistance through the uniform customer assistance program application process since TAP may provide a lower water bill. Responses to this campaign are still being processed and analyzed in 2020. Additional details on the results will be provided in the next council report. All efforts are being tracked, and the full effectiveness of the campaign will be assessed upon the campaign’s completion.

There were four Utility Fairs held in 2019 to provide utility bill assistance to customers. The events were held at the Mann Older Adult Center, the Rivera Recreation Center, Bible Way Baptist Church, and the Christy Recreation Center. These Utility Fairs were hosted by organizations such as Philadelphia Water Department, Philadelphia Gas Works, PECO Energy, Utility Emergency Services Fund, Department of Revenue, BenePhilly

Catholic Social Services, Community Legal Services, Pennsylvania Public Utility Commission, Casa del Carmen Family Service Center, PA Career Link and United Way of Greater Philadelphia and Southern New Jersey, as well as Councilmembers Maria Quiñones-Sanchez and Jannie Blackwell. Customer participation ranged from 60 to 150 attendees.

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. 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, 2019, the City enrolled **13,701 customers in TAP**. Together, these enrollees had **approximately \$39.7M 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 2019

Income Level as Compared to Federal Poverty Guideline	Total Enrollees	Total Pre-TAP Debt ^{1,2}
Up to 50%	2,406	\$7,125,594.85
Above 50% and up to 100%	7,046	\$20,062,344.57
Above 100% and up to 150%	3,943	\$11,212,161.17
Above 150% and up to 250%	253	\$1,036,375.63
Above 250%	53	\$244,934.45
Total	13,701	\$39,681,410.67

Table 3. Total Debt of Applicants Enrolled in TAP in 2019

Debt Range	Total Enrollees	Total Pre-TAP Debt ^{1,2}
< \$0	220	\$(32,017.42)
\$0–\$200	3,072	\$191,853.17
\$200–\$500	1,653	\$568,817.95
\$500–\$1,000	1,719	\$1,247,068.10
\$1,000–\$2,000	1,782	\$2,594,170.93
\$2,000–\$5,000	2,554	\$8,437,709.38
\$5,000–\$10,000	1,798	\$12,653,566.43
\$10,000–\$20,000	760	\$10,118,419.87
\$20,000–\$50,000	138	\$3,562,529.11
\$50,000+	5	\$307,275.73
Total³	13,701	\$39,681,410.67

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 13,701 applicants enrolled in TAP (see Table 2, above) during 2019, 9,650 applicants were not enrolled in TAP. This group includes 1) applicants who were denied for ineligibility or application incompleteness following a request for further information; 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	14
Failed to meet Income Guidelines (no Special Hardship)	525
Failed to meet Residency Guidelines	940
Installation Type Not Eligible for TAP	20
Missing or Invalid Income or Residency Documentation	4,603
Missing information on application form	469
Failed to prove Special Hardship	72
Total Denials	6,643
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill ⁴	820
Senior Citizen Discounted Bill + Extended Payment Agreement	214
Regular Bill ⁵	555
Regular Bill + Extended Payment Agreement	1,275
WRBCC Agreement	73
Total More Affordable Alternative Placements	2,937
Other Outcomes	
Customer Withdrew Application	0
Data Transfer ⁶	70
Total Other Outcomes	70
Total Applicants Not Enrolled in TAP	9,650

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, 2019, there were 7,854 active payment agreements between residential water customers and WRB. Of these agreements, 7,145 (91%) were created in 2019, while 709 (9%) were created in previous years and were still ongoing as of the end of 2019. Residential agreements are categorized as one of six 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) 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.
- 4) Extended Payment Agreements: Extended Payment Agreements were introduced during 2017 to assist customers who were income-ineligible for TAP.
- 5) TAP Payment Agreements: These new agreements were introduced during 2017 to allow customers to catch up on missed TAP payments.
- 6) 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 7,145 active residential agreements created in 2019 were made up of 3,963 First Standard Agreements, 2,063 Second Standard Agreements, 73 Water Revenue Bureau Conference Committee (WRBCC) Agreements, 764 Extended Payment Agreements, 277 TAP Payment Agreements, and 5 TAP Landlord Agreements (See Figure 3 above). Active residential agreements created in 2019 cover just over \$9.65M in principal debt, \$1.25M in penalties and \$175,000 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, 2019 by term range along with the principal, penalties, and other fees covered under the agreements. Table 5 shows information for agreements created in 2019; Table 6 shows agreements created before 2019; and Table 7 shows all agreements (the sum of agreements shown in Table 5 and Table 6).

As of December 31, 2019, there were 26,459 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 12/31/19) Residential Agreements Created in Calendar Year 2019

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	2,080	\$1,200,653.78	\$107,947.71	\$14,630.72
13–24 Months	1,471	\$1,309,214.61	\$97,132.52	\$19,703.52
25–36 Months	227	\$463,808.23	\$48,817.74	\$12,488.50
37–48 Months	85	\$328,012.38	\$39,373.77	\$7,735.70
49–60 Months	100	\$692,332.89	\$145,079.68	\$15,876.51
Total First Standard Agreements	3,963	\$3,994,021.89	\$438,351.42	\$70,434.95
Second Standard Agreements				
0–12 Months	1,023	\$724,840.06	\$77,076.42	\$11,292.74
13–24 Months	600	\$601,547.00	\$67,922.84	\$13,036.72
25–36 Months	226	\$432,685.37	\$62,538.45	\$12,239.83
37–48 Months	84	\$236,106.82	\$53,140.13	\$5,820.90
49–60 Months	130	\$597,142.94	\$125,837.32	\$13,339.60
Total Second Standard Agreements	2,063	\$2,592,322.19	\$386,515.16	\$55,729.79
WRBCC Agreements				
0–12 Months	73	\$250,938.14	\$29,115.13	\$1,318.25
Total WRBCC Agreements	73	\$250,938.14	\$29,115.13	\$1,318.25
Extended Payment Agreements				
13–24 Months	162	\$157,900.04	\$13,450.37	\$2,826.25
25–36 Months	96	\$146,821.27	\$15,503.08	\$4,915.80
37–48 Months	71	\$164,144.02	\$18,603.66	\$3,567.52
49–60 Months	47	\$108,165.22	\$13,193.97	\$2,894.53
>60 Months	388	\$2,092,168.81	\$341,499.42	\$32,789.93
Total Extended Payment Agreements	764	\$2,669,199.36	\$402,250.50	\$46,994.03
TAP Payment Agreements				
0–12 Months	264	\$117,647.40	\$0	\$685.75
13–24 Months	11	\$6,016.65	\$0	\$91.45
25–36 Months	2	\$1,619.88	\$0	\$0
Total TAP Payment Agreements	277	\$125,283.93	\$0	\$777.20
TAP Landlord				
13–24 Months	1	\$2,113.78	\$0	\$0
37–48 Months	1	\$1,900.42	\$0	\$20.00
>60 Months	3	\$19,147.56	\$0	\$242.90
Total TAP Landlord	5	\$23,161.76	\$0	\$262.90
Total of all Agreements	7,145	\$9,654,927.27	\$1,256,232.21	\$175,517.12

Table 6. Active (as of 12/31/19) Residential Agreements Created Before 2019

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	5	\$1,964.99	\$49.49	\$0
13–24 Months	61	\$83,893.22	\$7,124.64	\$987.25
25–36 Months	63	\$135,324.79	\$22,462.95	\$1,951.45
37–48 Months	46	\$221,730.60	\$22,003.44	\$1,797.25
49–60 Months	77	\$482,632.54	\$84,566.11	\$4,730.01
>60 Months	1	\$5,020.91	\$4,115.33	\$80.00
Total First Standard Agreements	253	\$930,567.05	\$140,321.96	\$9,545.96
Second Standard Agreements				
0–12 Months	2	\$491.73	\$19.08	\$0
13–24 Months	36	\$51,063.06	\$5,661.72	\$787.25
25–36 Months	54	\$119,610.03	\$26,055.07	\$1,938.54
37–48 Months	47	\$140,230.23	\$37,140.58	\$2,055.80
49–60 Months	58	\$258,926.09	\$49,133.45	\$3,343.05
Total Second Standard Agreements	197	\$570,321.14	\$118,009.90	\$8,124.64
Ten/Five Agreements				
37–48 Months	3	\$2,583.20	\$448.84	\$50.00
49–60 Months	58	\$188,814.69	\$25,243.29	\$1,399.42
>60 Months	2	\$8,857.71	\$1,606.23	\$10.00
Total Ten/Five Agreements	63	\$200,255.60	\$27,298.36	\$1,459.42
WRBCC Agreements				
0–12 Months	1	\$1,696.38	\$150.86	\$10.00
Total WRBCC Agreements	1	\$1,696.38	\$150.86	\$10.00
Extended Payment Agreements				
0–12 Months	0	\$0	\$0	\$0
13–24 Months	14	\$13,142.72	\$1,292.90	\$302.90
25–36 Months	17	\$26,351.27	\$2,650.12	\$362.90
37–48 Months	18	\$28,335.17	\$2,724.02	\$594.59
49–60 Months	13	\$30,132.42	\$2,914.95	\$341.45
>60 Months	133	\$751,265.68	\$119,582.79	\$9,292.45
Total Extended Payment Agreements	195	\$849,227.26	\$129,164.78	\$10,894.29
Total of all Agreements	709	\$2,552,067.43	\$414,945.86	\$30,034.31

Table 7. Summary of All Active (as of 12/31/19) Residential Agreements

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	2,085	\$1,202,618.77	\$107,997.20	\$14,630.72
13–24 Months	1,532	\$1,393,107.83	\$104,257.16	\$20,690.77
25–36 Months	290	\$599,133.02	\$71,280.69	\$14,439.95
37–48 Months	131	\$549,742.98	\$61,377.21	\$9,532.95
49–60 Months	177	\$1,174,965.43	\$229,645.79	\$20,606.52
>60 Months	1	\$5,020.91	\$4,115.33	\$80.00
Total First Standard Agreements	4,216	\$4,924,588.94	\$578,673.38	\$79,980.91
Second Standard Agreements				
0–12 Months	1,025	\$725,331.79	\$77,095.50	\$11,292.74
13–24 Months	636	\$652,610.06	\$73,584.56	\$13,823.97
25–36 Months	280	\$552,295.40	\$88,593.52	\$14,178.37
37–48 Months	131	\$376,337.05	\$90,280.71	\$7,876.70
49–60 Months	188	\$856,069.03	\$174,970.77	\$16,682.65
Total Second Standard Agreements	2,260	\$3,162,643.33	\$504,525.06	\$63,854.43
Ten/Five Agreements				
37–48 Months	3	\$2,583.20	\$448.84	\$50.00
49–60 Months	58	\$188,814.69	\$25,243.29	\$1,399.42
>60 Months	2	\$8,857.71	\$1,606.23	\$10.00
Total Ten/Five Agreements	63	\$200,255.60	\$27,298.36	\$1,459.42
WRBCC Agreements				
0–12 Months	74	\$252,634.52	\$29,265.99	\$1,328.25
Total WRBCC Agreements	74	\$252,634.52	\$29,265.99	\$1,328.25
Extended Payment Agreements				
13–24 Months	176	\$171,042.76	\$14,743.27	\$3,129.15
25–36 Months	113	\$173,172.54	\$18,153.20	\$5,278.70
37–48 Months	89	\$192,479.19	\$21,327.68	\$4,162.11
49–60 Months	60	\$138,297.64	\$16,108.92	\$3,235.98
>60 Months	521	\$2,843,434.49	\$461,082.21	\$42,082.38
Total Extended Payment Agreements	959	\$3,518,426.62	\$531,415.28	\$57,888.32
TAP Payment Agreements				
0–12 Months	264	\$117,647.40	\$0	\$685.75
13–24 Months	11	\$6,016.65	\$0	\$91.45
25–36 Months	2	\$1,619.88	\$0	\$0
Total TAP Payment Agreements	277	\$125,283.93	\$0	\$777.20
TAP Landlord				
13–24 Months	1	\$2,113.78	\$0	\$0
37–48 Months	1	\$1,900.42	\$0	\$20.00
>60 Months	3	\$19,147.56	\$0	\$242.90
Total TAP Landlord	5	\$23,161.76	\$0	\$262.90
Total of all Agreements	7,854	\$12,206,994.70	\$1,671,178.07	\$205,551.43

4.4 CUSTOMERS DEFAULTING FROM TAP

PWD Regulations Section 206.6(c), below, describes the reasons 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 2019, there were 8,094 cases of TAP participants defaulting from TAP, all for failure to successfully recertify. Of those, the vast majority of applicants (5,934) did not respond to the recertification request in a timely manner, 1,693 were denied for cause, and 467 were enrolled in a more affordable alternative. Table 8 below describes the outcome of these 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 considered to have defaulted from TAP.

Table 8. Customers Defaulting from TAP

Outcome	Count
Did Not Respond	5,934
Denied	
Failed to meet Income Guidelines (no Special Hardship)	67
Failed to meet Residency Guidelines	131
Missing or Invalid Income or Residency Documentation	1,331
Missing information on application form	149
Denied with Data Transfer or Denied in Error	15
Total Denials	1,693
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill	120
Senior Citizen Discounted Bill + Extended Payment Agreement	36
Regular Bill	114
Regular Bill + Extended Payment Agreement	197
Total More Affordable Alternative Placements	467
Total Customers Defaulting from TAP	8,094

The number of customers defaulting from TAP in 2019 is significantly higher than those defaulting from TAP in 2018. This is due to 2019 being the first full year during which TAP participants were requested to recertify, as compared to only a few months of active recertification during 2018. Of the 5,934 customers that did not respond in a timely manner, 3,537 unique customers submitted subsequent applications after the initial default from TAP, and 2,595 of those customers were subsequently enrolled in TAP, as of January 24, 2020. 351 of those applicants were enrolled in a more affordable alternative program.

5. CONCLUSION

During 2019, the City successfully continued administering a complex customer assistance program. Customer participation continued to grow consistently, in part as a result of ongoing outreach efforts. Participation levels continue to demonstrate the public's interest in achieving affordable water bills, which are now a reality for thousands of customers.

During 2019, with the assistance of our partners, WRB successfully **enrolled 13,701 customers in TAP**. Some of these customers are beginning their second year of TAP participation through the automatic recertification process. **As of December 2019, there were 15,258 active TAP participants.**

Ongoing efforts to improve on established processes and communications have greatly strengthened the program and position it to achieve more success in the future. As we celebrated the program's second anniversary, consistent growth and continued public interest indicate a strong future for TAP.