

PHILADELPHIA WATER DEPARTMENT
STATEMENT NO. 5

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Related Charges	Fiscal Years 2022 - 2023
--	--------------------------

Direct Testimony

of

Susan M. Crosby and RaVonne A. Muhammad

on behalf of

The Philadelphia Water Department

Dated: January 2021

TABLE OF CONTENTS

<u>I.</u>	INTRODUCTION AND PURPOSE OF TESTIMONY	1
<u>II.</u>	OVERVIEW OF THE WATER REVENUE BUREAU	3
<u>III.</u>	CUSTOMER ASSISTANCE PROGRAMS.....	7
<u>IV.</u>	BILLING/COLLECTION AND SERVICE RESTORATION ACTIVITIES	14
<u>V.</u>	SHUT-OFF NOTICES.....	16
<u>VI.</u>	CONCLUSION.....	16

I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q1. PLEASE STATE YOUR NAME AND POSITION WITH THE WATER REVENUE BUREAU.

A1. My name is Susan M. Crosby and I serve as the Deputy Revenue Commissioner in charge of the Water Revenue Bureau (“WRB”). Also testifying with me is RaVonne A. Muhammad, who serves as Assistant to the Director of Finance, Water Revenue Assistance Division.

Q2. BY WHOM ARE YOU EMPLOYED AND WHAT ARE YOUR RESPECTIVE JOB RESPONSIBILITIES?

A2. We are employed by the City of Philadelphia’s (“City”) Department of Revenue and, in our respective capacities, oversee the operations of WRB: including billing, accounting, collection activities, as well as the administration of customer service and customer assistance functions for the Philadelphia Water Department (“PWD” or “Department”).

Q3. PLEASE DESCRIBE YOUR RESPECTIVE EDUCATIONAL BACKGROUNDS AND EXPERIENCE.

A3. Our respective backgrounds and experience are summarized below.

Mrs. Crosby

I hold a Bachelor of Science in History and in Political Science from Florida State University and a Juris Doctor Degree from Stetson University College of Law. Prior to my tenure with WRB, I was employed by the City Law Department as a Divisional Deputy City Solicitor. My resume of experience is attached as Schedule SMC-1.

Mrs. Muhammad

I studied Sport and Recreation Management at Temple University. Beginning in December 1994, I held positions of increasing responsibility in the City's Recreation Department. In February 2009, I joined the Water Revenue Bureau as a Collection Customer Representative in the Water Revenue Account Analysis Unit, and after a series of promotions, I was appointed to my current position. My resume of experience is attached as Schedule RM-1.

Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A4. The purpose of our testimony is to: (i) provide an overview of the WRB; (ii) discuss customer assistance programs administered by WRB, including payment agreements and special rates available to eligible customers under the Tiered Assistance Program ("TAP") and Senior Citizen Discount; and (iii) survey billing, collection, service termination notice, and restoration of service-related activities.

Q5. PLEASE IDENTIFY THE SCHEDULES THAT ACCOMPANY YOUR DIRECT TESTIMONY.

A5. The following schedules accompany our testimony:

Schedule SMC-1: Resume of Susan M. Crosby

Schedule SMC-2: Annual Report to Mayor on TAP

Schedule RM-1: Resume of RaVonne A. Muhammad

II. OVERVIEW OF THE WATER REVENUE BUREAU

Q6. PLEASE DESCRIBE THE WATER REVENUE BUREAU AND THE SPECIFIC SERVICES IT PROVIDES TO THE PWD.

A6. WRB is part of the Department of Revenue. Under Section 6-201 of the Philadelphia Home Rule Charter, the Department of Revenue performs all functions relating to billing and collections on customer accounts for PWD through WRB. The wages and salaries of approximately 232 employees in WRB are funded by the PWD.

Q7. PLEASE DESCRIBE WRB'S ACTIVITIES RELATED TO CUSTOMER SERVICE, BILLING, COLLECTIONS AND CUSTOMER ASSISTANCE PROGRAMS.

A7. WRB administers the Customer Intake Centers which provide customer support services related to applications for service, change of billing address, meter reading inquiries, billing inquiries, billing disputes, and payment arrangements. WRB also administers payment agreements and income-based customer assistance programs, including TAP and the Senior Citizen Discount. In FY 2020, the number of customers visiting WRB intake offices was approximately 50,000.

Q8. PLEASE HIGHLIGHT RECENT AND FUTURE BILLING AND CUSTOMER SERVICE IMPROVEMENTS?

A8. Since October 2019, WRB has operated a new e-billing website which has attracted over 154,137 water customers (26% of eligible accounts). Through this website, customers can now set up personalized, automatic payments with a checking or savings account, enroll in paperless billing, make one-time payments with free eCheck, or make one-time

1 payments with a credit or debit card (fees apply). Customers can also review and print up
2 to 13 months of billing history and get email or text-message reminders about their bills
3 and payments. In addition, the site includes links to report a water emergency or get
4 assistance when a customer cannot pay their water bill. As of November 2020, twenty-six
5 percent of the water customer base uses the e-billing platform. Also, slightly more than
6 twenty-three percent of the entire customer base is now paperless – saving on bill printing
7 resources.

8 The fees associated with credit and debit card payments made through e-billing and by
9 phone have also been reduced. Previously residential customers paid \$3.95 per
10 transaction but will now pay \$2.95. Commercial customers previously paid \$25.00 per
11 transaction and now pay \$15.95. The fees remain unchanged for customers paying by
12 credit card in person.

13
14 Upcoming enhancements to the e-billing website will include water consumption details.
15 This information will help MyPhillyWaterBill enrolled customers with respect to water
16 consumption rates, trends in usage, and alert customers in the event of water leaks or lack
17 of water usage. This future improvement is expected to result in a reduction in high bills,
18 as customers become aware on a timelier basis of the need for repairs or other actions.
19

20 **Q9. ARE THERE NEW CHALLENGES PRESENTED DURING THE RATE**
21 **PERIOD, FY 2022 AND FY 2023, IN LIGHT OF COVID-19?**
22

23 **A9.** Yes. The PWD's/WRB's responses to the COVID-19 pandemic have created challenges
24 that will continue during the rate period.
25

1 First, an array of challenges is presented because the vast majority of WRB collection
2 activities have been suspended since March 2020. As a result of the suspension of
3 collection activities, a historic number of accounts have fallen into arrears and will be
4 subject to shutoff when the moratorium is lifted. As of November 30, 2020, 69,843
5 accounts would be eligible for service termination absent the moratorium. That number is
6 comprised of 60,830 Non-TAP residential customers, 3,174 TAP customers, and 5,839
7 commercial customers. The current number of accounts eligible for shut-off will likely
8 increase over time (given the continuing moratorium). Based on the eligibility numbers
9 as of November 30, 2020, it would take 40 weeks to terminate the residential accounts
10 eligible for service termination (assuming 400 shut-offs can be done each day) when
11 there are only 32 weeks available for shut-offs in any given calendar year.

12
13 A second challenge relates to both: (a) planning for the collection scenario that will likely
14 arise after the shut-off moratorium is lifted; and, (b) informing our customers how to
15 avoid higher, unmanageable arrears and potential shut-off. In this regard, WRB and PWD
16 have revised their collection protocols to: (i) encourage customer payment of outstanding
17 bills during the moratorium; and/or (ii) facilitate the negotiation of standard payment
18 agreements, application for TAP, filing TAP recertification, or other steps to ensure
19 uninterrupted service when the shut-off moratorium is lifted. The above proactive
20 approach during the moratorium has been described as “compassionate collection.”
21 Additional programs to reach out to payment troubled customers are described in Section
22 III below.

23
24 A third challenge presented is addressing customer needs in an efficient way, while
25 observing necessary safety protocols. In this context, WRB has implemented various

1 measures to protect our staff and help them work safely through the pandemic while
2 maintaining customer support activities. To ensure a safe workplace, WRB has made the
3 determination certain employees are to work remotely or in staggered shifts. WRB has
4 also implemented safeguards to make sure those employees that are physically in the
5 office are socially distanced to mitigate any risk of infection. Notably, the above
6 measures protect customers as well as employees.

7
8 The above described work configuration, at first, resulted in delays in responding to
9 customers and longer processing times for customer service and customer assistance
10 applications. Those delay times have now been resolved and response and processing
11 times are at pre-pandemic levels. To be sure, yet another challenge will be presented with
12 the anticipated increase in workload after the shut-off moratorium ends. At that point, our
13 limited staff resources will be stretched to their limits.

14 **Q10. WHY IS THE PROPOSED RATE INCREASE RELEVANT TO WRB?**

15 A10. WRB is committed to maintaining and improving all aspects of billing and collection for
16 the PWD. Educating customers on available assistance and payment options is, and will
17 remain, an important part of billing and collection.

18
19 WRB's operations are funded entirely by revenue from the Department. Funds from the
20 proposed rates will support WRB's staff and activities. Without rate relief, the PWD's
21 ability to support WRB would be limited. Cuts to funding for WRB would make it harder
22 for WRB's staff to deliver timely and efficient customer service, to satisfy customers'
23 expectations, and to increase customer satisfaction in the long term.

III. CUSTOMER ASSISTANCE PROGRAMS

Q11. PLEASE IDENTIFY CUSTOMER ASSISTANCE PROGRAMS AVAILABLE TO PWD CUSTOMERS.

A11. WRB offers a variety of payment assistance through (i) standard payment agreements; (ii) extended payment agreements; (iii) the Water Revenue Assistance Program (“WRAP”); and (iv) TAP. Each is briefly described below.

Standard Payment Agreements

Standard payment agreements are available to residential customers irrespective of income, generally require an initial payment of 25% of the outstanding delinquency, and payment of the remainder in monthly installments over 18 months. Customer Service Managers can extend the monthly installments up to 60 months. WRB entered into approximately 21,232 standard payment agreements in calendar year 2019 and 3,937 standard payment agreements in calendar year 2020 as of November 30, 2020.

Extended Payment Agreements

Extended payment agreements are available to customers with household incomes 151% and 250% of the Federal Poverty Level (“FPL”) but who do not qualify for TAP. These agreements may have payout terms longer than 18 months if WRB determines that an extended payout term is necessary to keep the average monthly total bill for current usage, service, stormwater charges and payment of arrears at or below approximately 4% of the customer’s monthly household income. WRB entered into approximately 1447 extended payment agreements in calendar year 2019 and 411 extended payment agreements in calendar year 2020 (as of November 30, 2020).

WRAP

WRAP is a legacy customer assistance program offered by WRB. Prior to July 1, 2018, WRAP agreements were offered to delinquent customers whose annual household income was 250% or less of FPL. Similar to TAP, the payment required is a set amount for a 12 month period. WRB stopped accepting requests for new WRAP applications on July 1, 2017. Existing WRAP participants are eligible to remain in the program if they remain income eligible and timely recertify. There were approximately 74 active WRAP agreements as of January 1, 2020. There were approximately 54 WRAP payment agreements in calendar year 2020 (as of November 30, 2020).

TAP Payment Agreements

TAP payment agreements are available to customers enrolled in TAP and have delinquent TAP bills. WRB entered into approximately 939 TAP payment agreements in calendar year 2019 and 179 TAP payment agreements in calendar year 2020 (as of November 30, 2020).

**Q12. PLEASE IDENTIFY ANY ADDITIONAL CUSTOMER ASSISTANCE
PROGRAMS ADMINISTERED BY WRB.**

A12. In addition to the foregoing, WRB assists PWD customers through TAP and the Senior Citizen Discount. These programs are brief discussed below.

TAP

TAP was launched on July 1, 2017, and assists low-income households at or below 150%

1 of the FPL and those with a special hardship (e.g., losing a job). Under this program,
2 monthly water, sewer, and stormwater bills are tied to household income. Payments range
3 from 2% to 4% of monthly household income.

4
5 Qualified TAP customers, who have made 24 payments, will also receive forgiveness of
6 all arrears accumulated by the Customer prior to entering the program (i.e., pre-TAP
7 arrears).¹

8
9 The Department does not collect payments against municipal liens from bills that have
10 are forgiven. Therefore, there is no potential for the Department to simultaneously
11 recover forgiven arrearages from ratepayers through its TAP Rider and also recover those
12 amounts through the payoff of a lien. The amount due on a filed lien is always calculated
13 based on current data in Department's accounting (ledger) system. If an amount is
14 forgiven by the Department, that forgiveness is recorded in the Department's system.
15 When all the debt from unpaid bills under a lien is paid or forgiven, the lien is removed
16 from the property.² Recovery of arrearage forgiveness is discussed in PWD Statement
17 7B.

18
19 Senior Discount

20 The Senior Citizen Discount program is available to customers 65 or older with
21 household incomes not exceeding \$33,300 per year with the implementation of the FY
22 2022 rates. *See* PWD Statement 7A and Schedule BV-6: WP-4.³ Customers in this

23
24 ¹ At program launch, TAP customers received forgiveness of penalty charges on their pre-TAP arrears. As of
September 1, 2020, TAP customers can now receive forgiveness of all pre-TAP arrears.

25 ² If the debt secured by a lien is paid, the lien is marked as satisfied. If the debt secured by a lien is forgiven,
the lien is marked as vacated.

³ The senior citizen threshold, without the proposed adjustment, is \$32,300 per year. Schedule BV-6: WP-4.

1 program receive a 25% discount on the standard usage, service, and stormwater charges
2 for water, sanitary sewer and stormwater services.

3
4 Matching Grants

5 The Utility Emergency Services Fund (“UESF”) is a not-for-profit, tax-exempt,
6 charitable organization.⁴ UESF provides financial assistance to low income individuals
7 and families who are facing utility terminations or who have had their utilities shut off.
8 PECO, the Philadelphia Gas Works (“PGW”), and the Department match each dollar of
9 financial assistance provided by UESF in the form of a matching bill credit on their
10 respective utility accounts.

11
12 UESF’s Utility Grant program is administered by USEF, not WRB. The program is
13 designed to bring a customer’s delinquent account up to date. UESF’s financial
14 assistance, the matching utility bill credit, and any contribution by the individual should
15 zero out the subject utility bill. The projected matching grants by the Department during
16 the Rate Period are discussed in detail in PWD Statement 7A.

17
18 **Q13. PLEASE STATE HOW MANY PWD CUSTOMERS PARTICIPATE IN TAP AND**
19 **SENIOR CITIZEN DISCOUNT PROGRAMS.**

20 A13. WRB enrolled 13,355 unique accounts in TAP in calendar year 2019. Of those, 4,199
21 were enrolled in TAP for the first time. In calendar year 2020, approximately 15,000
22 unique accounts were enrolled in TAP (as of July 2020). Of those, 4,655 were enrolled
23 for the first time. As of June 30, 2019, there were 24,000 customers receiving the Senior
24

25 ⁴ See <https://uesfacts.org/>, <https://uesfacts.org/>, and <https://uesfacts.org/our-programs/utility-grant-program/>.

Citizen Discount. As of June 30, 2020, approximately 23,200 customers received the senior discount. *See* PWD Statement 6 and Schedule RFC-5.

Q14. HAVE THERE BEEN ANY MATERIAL CHANGES IN PARTICIPATION LEVELS IN THE VARIOUS CUSTOMER ASSISTANCE PROGRAMS IDENTIFIED ABOVE DURING CALENDAR YEAR 2020 AND CALENDAR YEAR 2021? PLEASE EXPLAIN.

A14. Yes. As referenced in Tables 1 through 3 below, the number of customers requesting assistance in calendar year (“CY”) 2019 is lower than in CY 2018. The corresponding number of customers requesting assistance in CY 2020 is the lower than in CY 2019. This reduced level of customer participation is shown by changes in the total number of standard payment agreements and residential payment agreements, as well as changes in the total number of payment arrangements negotiated during this period.

Table 1			
Change In Standard Payment Arrangements			
Calendar Year	Total Standard	Change	Percent
2018	26,422	--	--
2019	21,232	-5,190	-20%
2020	3,937	-17,295	-81%

Table 2			
All Residential Payment Agreements			
Calendar Year	All Residential	Change	Percent
2018	28,545	--	--
2019	23,752	-4,793	-17%
2020	4,559	-19,193	-81%

Table 3			
Change In All Payment Arrangements			
Calendar Year	All Standard	Change	Percent
2018	31,212	--	--
2019	26,244	-4,968	-16%
2020	4,802	-21,442	-82%

The above reduced participation levels are likely tied to a number of factors arising since March 2020 including, the suspension of most collection activities, the restoration of service for suspended accounts (except for unsafe plumbing conditions), and the moratorium on utility shut-offs which, in combination, lessened any incentive to seek assistance through use of payment agreements or other payment arrangements.

Q15. WHAT STEPS HAS WRB UNDERTAKEN TO IMPROVE OUTREACH FOR ITS VARIOUS CUSTOMER ASSISTANCE PROGRAMS?

A15. WRB will be conducting a large outreach project targeted to customers who are on Owner-Occupied Payment Agreements (“OOPA”) for real estate taxes under Philadelphia Code 19-1305. Since these customers’ residency and income have already been determined, they are likely to qualify for TAP. Additionally, the application process would be streamlined since they would not be required to submit proof of residency and income if they received an OOPA within the last 12 months.

Additional information on customer outreach and support activities during 2019 is available in Section 3 of the Department of Revenue’s fourth Annual Report to the Mayor on the Tiered Assistance Program, issued on May 7, 2020 and attached as Schedule SMC-2.

**Q16. DOES WRB AND PWD POST INFORMATION ONLINE WITH REGARD TO
CUSTOMER ASSISTANCE PROGRAMS IT ADMINISTERS?**

A16. Yes. WRB and PWD have established a Customer Assistance Program website,
<https://cap.phila.gov/static/index.html>.

This website provides a portal to a sample application, an application checklist, a fact
sheet, and eligibility guidelines, which is available at:

[https://www.phila.gov/documents/water-bill-customer-assistance-application-and-
documents/](https://www.phila.gov/documents/water-bill-customer-assistance-application-and-documents/).

Customers who cannot pay their bill should apply for help using the application at
www.phila.gov/waterbillhelp.

**Q17. WHAT OTHER STEPS HAS WRB TAKEN TO MAKE THE AVAILABILITY OF
ITS CUSTOMER ASSISTANCE PROGRAMS KNOWN TO PAYMENT
TROUBLED CUSTOMERS?**

A17. Information about TAP has been produced and disseminated in both English and Spanish.
Translation services are also available for customers who request information or the
application in a language other than English or Spanish. The application itself is currently
available in the top ten languages requested for translation in Philadelphia: Chinese
(traditional and simplified), Vietnamese, Russian, Arabic, Cambodian (Mon-Khmer),
Portuguese, and Italian in addition to English and Spanish.

IV. BILLING/COLLECTION AND SERVICE RESTORATION ACTIVITIES

Q18. IS THERE A MORATORIUM ON SERVICE TERMINATIONS AT PRESENT?

A18. Yes. The City has imposed a moratorium on shut-offs and service disconnections during the pendency of the COVID-19 pandemic. Currently, the public health moratorium is in place until at least Thursday, April 1, 2021.

Q19. WHAT HAPPENED TO DELINQUENT WATER ACCOUNTS THAT WERE SHUT-OFF PRIOR TO THE START OF THAT MORATORIUM?

A19. To protect public health, PWD crews worked to restore water to all residential accounts that were shut-off prior to the start of the public health moratorium. Water service was restored unless unsafe plumbing conditions were discovered. If unsafe conditions existed, homeowners could seek interest-free emergency loan using the PWD's Homeowner's Emergency Loan Program ("HELP"). Applications for HELP loans continued to be processed by PWD during the pandemic.

Q20. WAS A RESTORTATION CHARGE ASSESSED ON THOSE RESTORED ACCOUNTS?

A20. No. As a temporary measure, all penalties and late fees for water bills were suspended for residential and commercial water customers. This suspension included restoration fees. It is anticipated that this measure will end at the same time that the public health moratorium ends. The exact timing will be determined by the PWD and WRB.

In addition, I would note that, as part of this proceeding, the Department is proposing to implement special shut-off and restoration of water service fees for TAP customers. *See*

1 PWD Statements 2 and 7A. These fees, included under proposed Section 6.4(e) in the
2 proposed Rates and Charges (*see* PWD Exhibit 3), are for (i) shut-off of service /
3 payment tendered at the time of shut-off; and, (ii) restoration of service after termination
4 for non-payment or violation of service requirements. If approved, WRB and the
5 Department will be conducting outreach to TAP customers to inform them of these fees.

6
7 **Q21. PLEASE DESCRIBE HOW WRB IS PREPARING FOR THE RESUMPTION OF**
8 **COLLECTION ACTIVITIES.**

9 A21. In addition to compassionate collection activities alluded to above (to avoid higher
10 arrears), WRB will be implementing arrearage management on a case-by-case basis.
11 WRB will be educating customers on available assistance. It will also, if appropriate, be
12 offering 12-month or 18-month arrearage management programs to customers.

13
14 The end of the moratorium does not mean customers with arrears, over the threshold
15 amount (\$75 for TAP that are delinquent for two billing periods, more than \$150 for all
16 others that are delinquent for two billing periods), can be immediately shut-off. For
17 customers that accrued arrears prior to and/or during the moratorium, PWD must initiate
18 outreach to potentially affected customers. The shut-off notice gives prior notice of the
19 actual termination of service. Such notice tends to be a motivator for customers to seek
20 assistance or enter into new or modified payment agreements. As explained above, WRB
21 is anticipating increased customer interactions and will be using its limited resources to
22 address the same.

V. SHUT-OFF NOTICES

**Q22. WHAT CHANGES HAVE BEEN MADE IN THE SHUT-OFF PROCEDURES
SINCE THE LAST GENERAL RATE PROCEEDING?**

A22. To provide a more timely and meaningful notice of shutoff, PWD revised its regulations in 2018 to reduce the required number of shutoff notices from two to one and revised its shutoff procedures to prioritize the accounts with the oldest debt rather than the accounts with the highest delinquencies. The revised regulations became effective on December 31, 2018.

**Q23. AT THE END OF THE PUBLIC HEALTH MORATORIUM, WILL EVERY
CUSTOMER ELIGIBLE FOR SERVICE TERMINATION BE SENT A SHUT-
OFF NOTICE?**

A23. A shut-off notice will be issued only when PWD has made the decision to disconnect service in the absence of a customer paying their bill. The number of notices at any one time will be limited to the ability of PWD to actually perform the service termination. WRB currently only schedules residential shut offs about 4 weeks in advance.

VI. CONCLUSION

Q24. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A24. Yes, it does.

Susan M. Crosby, Esq.

Relevant Experience

Deputy Revenue Commissioner, Water Revenue Bureau (WRB) Philadelphia, PA 2020-current **City of Philadelphia Department of Revenue**

- Oversee the operating budget of \$17.5 million.
- Responsible for 220 budgeted positions that consist of the Accounting Unit, Administrative Support Unit, Call Center, Collections, Customer Service, and Technical Operations.
- Responsible for the monthly generation and collection of Water/Sewer bills for approximately 500 thousand customers.
- Responsible for financial reporting to the Water Department and the City Controller's Office on a monthly basis.
- Serves on the Revenue Commissioner's Executive Team which has been tasked with developing and implementing the strategic plan for the Revenue Department.

Divisional Deputy City Solicitor, City of Philadelphia Law Department Philadelphia, PA 2014-2020

- Represents the City and School District of Philadelphia in tax matters before the Tax Review Board, the Court of Common Pleas, the Commonwealth Court, and the Supreme Court of Pennsylvania.
- Maintains limited litigation caseload including administrative hearings, trials, and appeals where delinquencies exceed \$100,000.
- Manages over 20 exempt and civil service staff, fosters a collaborative work environment to encourage staff to assist each other with their caseloads, redeploys staff as necessary to encourage personal growth and align personnel strengths with the goals and requirements of the work groups.
- Manages 3 junior, direct report attorneys and am responsible for litigation training, skill development, case assignment, and individual mentoring.
- Represents the Law Department and Water Revenue Bureau (WRB) in the development and implantation of the Tiered Assistance Program, including developing business requirements, standard operating procedures, IT solutions, drafting and managing the RFP for application processing, and providing legal counsel to all team members.
- Represents the WRB in water rate setting proceedings, including drafting regulatory filings, responding to participant information requests, conducting direct and cross examination of experts, and engaging the customer base in public hearings.
- Modernized the Mass Revenue Litigation Division within the Tax and Revenue Unit by: reviewing workflows to remove redundancies and increase capacity, reorganizing staff to create equitable distribution of work and increased availability of public-facing staff and updated Municipal Court processes to bring them into compliance with the Rules of Professional Responsibility and Civil Procedure.
- Developed metrics for tracking delinquent tax and water collections and leverage those metrics to support requests for staff and resource augmentation.
- Developed an USTRA working group with monthly coordination meetings, resulting in increased collection of referred delinquent water debt. Stakeholders from WRB, the Water Department, IT, and outside counsel discuss shutoff notices, programming needs, payment plans, and workflow changes.

Deputy City Solicitor, City of Philadelphia Law Department Philadelphia, PA 2013-2014

- Represented the City and School District of Philadelphia in tax matters before the Tax Review Board, the Court of Common Pleas, and the Commonwealth Court.
- Maintained extensive litigation caseload including administrative hearings, trials, and appeals.
- Managed several special on-going projects including project to write-off uncollectible delinquencies, Real Estate dunning program, and Department of Revenue subpoena responses.
- Increased personal collections by 60% to bring in \$2.4 million for the City and School District.
- Mentored other attorneys in the practice group.

Assistant City Solicitor, City of Philadelphia Law Department Philadelphia, PA 2012-2013

- Represented the City and School District of Philadelphia in tax matters before the Tax Review Board and the Court of Common Pleas.
- Leveraged litigation experience to collect \$1.2 million in delinquent taxes during the first year with the Law Department.
- Quickly learned the applicable ordinances, regulations, and binding case law that form the body of local Philadelphia tax law.

Relevant Experience (Continued)

Assistant State Attorney, State Attorney's Office, Sixth Judicial Circuit Clearwater, FL 2001-2008

- Participated in specialized practice divisions including Traffic, Domestic Violence, and Drug Court.
- Broad courtroom experience with over thirty jury trials and extensive motion practice.
- Supervised up to five other attorneys as a Lead Trial Attorney, including delegating courtroom calendar assignments, assisting with trial preparation, and managing the pending caseload for the division.
- Developed reporting metrics to track outcomes and to plan for future assignments.

Education

Stetson University College of Law

St. Petersburg, FL

Juris Doctor 2001

- Editor-In-Chief of the Stetson Law Forum (Fall 1999-Fall 2001)
- Letters of Commendation: Environmental Law, Complex Litigation
- Honors: Dean's List, Honor Roll, and William F. Blews Pro Bono Service Award

Florida State University

Tallahassee, FL

Bachelor of Science 1998

- Double Major in History and Political Science
- Florida Bright Futures Scholarship Recipient
- Phi Sigma Pi National Honor Fraternity
- Sigma Sigma Sigma Panhellenic Sorority

Publications

Journal of the American Water Resources Association

March 2020

Technical Paper: An Experiment in Making Water Affordable: Philadelphia's Tiered Assistance Program (TAP) by Elizabeth A. Mack, Sarah Wrase, Joanne Dahme, Susan M. Crosby, Martha Davis, Melody Wright, Ravonne Muhammad. Paper No. JAWRA-19-0024-P of the Journal of the American Water Resources Association (JAWRA). First published: 16 March 2020, <https://doi.org/10.1111/1752-1688.12830>

- This article presents and assesses customer and revenue impacts of a groundbreaking income-based billing solution to the challenge of water services affordability in Philadelphia, Pennsylvania.

Affiliations

- Commissioner and Secretary, Mayor's Commission on Women
- Admitted to practice in Pennsylvania and Florida (inactive)
- Member, Water Customer Care Forum
- Girl Scouts of Eastern Pennsylvania Service Unit and Troop Leader

An aerial photograph of Philadelphia, showing the Schuylkill River winding through the city. The river is surrounded by lush green trees and parks. In the background, the city skyline is visible with numerous skyscrapers, including the Comcast Center. A multi-lane highway with traffic is visible on the right side of the river.

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

Department of Revenue

Calendar Year 2019

May 7, 2020



City of
Philadelphia

TABLE OF CONTENTS

1.	EXECUTIVE SUMMARY	1
	BY THE NUMBERS	1
2.	INTRODUCTION	3
2.1	TIERED ASSISTANCE PROGRAM	4
2.2	2019 HIGHLIGHTS	5
3.	CUSTOMER OUTREACH AND SUPPORT	6
4.	REPORTING METRICS	7
4.1	APPLICANTS ENROLLED IN TAP	8
4.2	APPLICANTS NOT ENROLLED IN TAP	9
4.3	NON-TAP PAYMENT AGREEMENTS	10
4.4	CUSTOMERS DEFAULTING FROM TAP	14
5.	CONCLUSION	15

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).

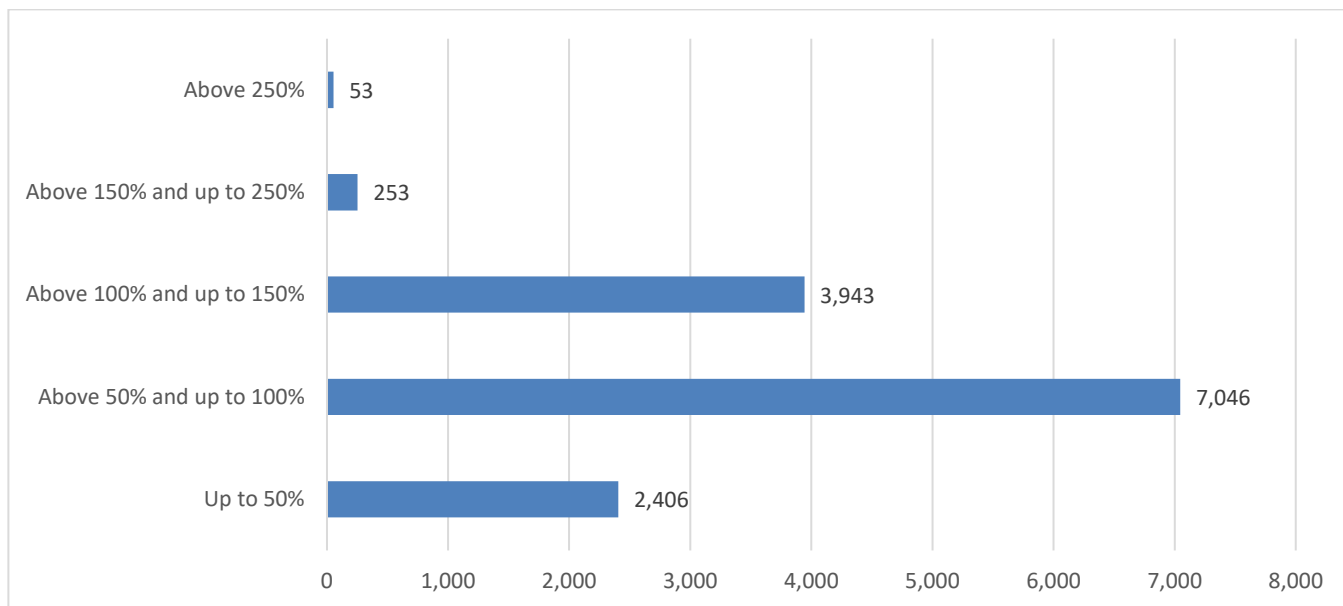


Figure 1. 2019 TAP Enrollees by Federal Poverty Guideline

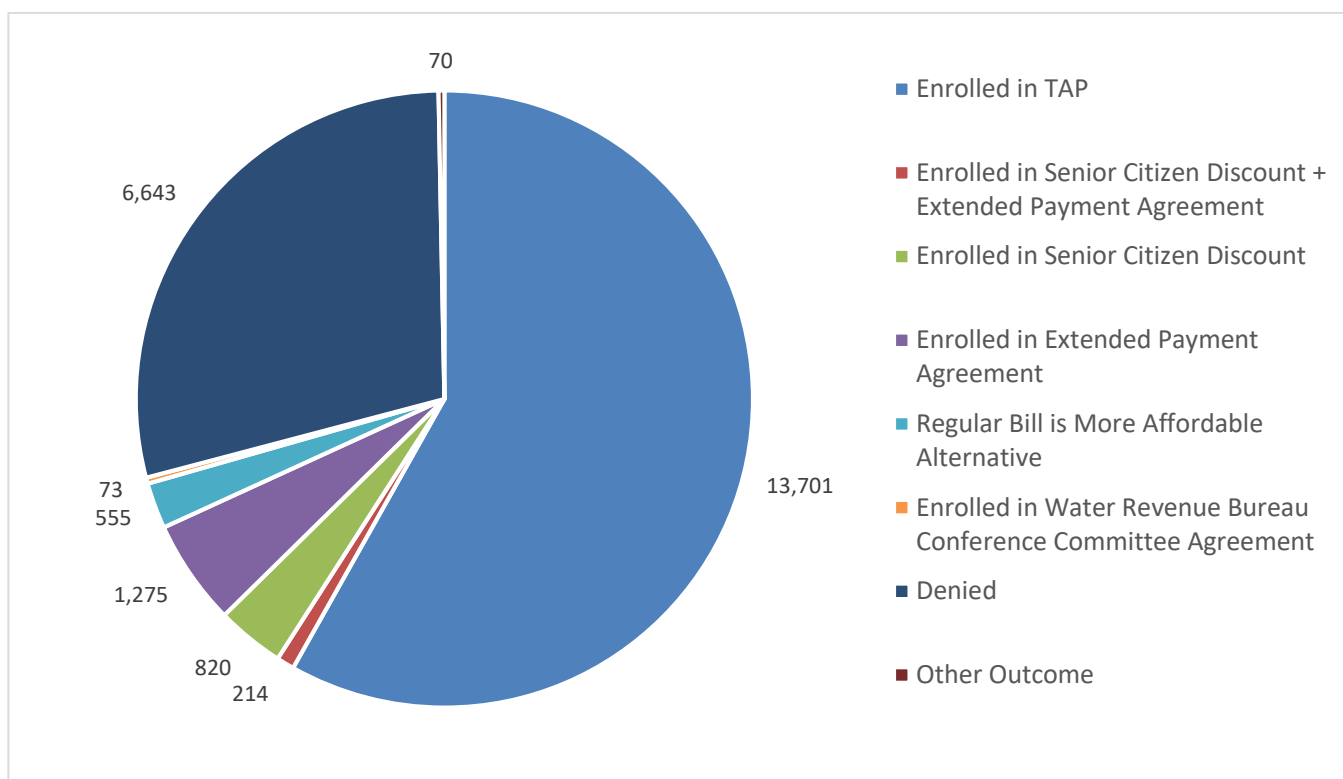


Figure 2. 2019 Customer Assistance Application Outcomes

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.

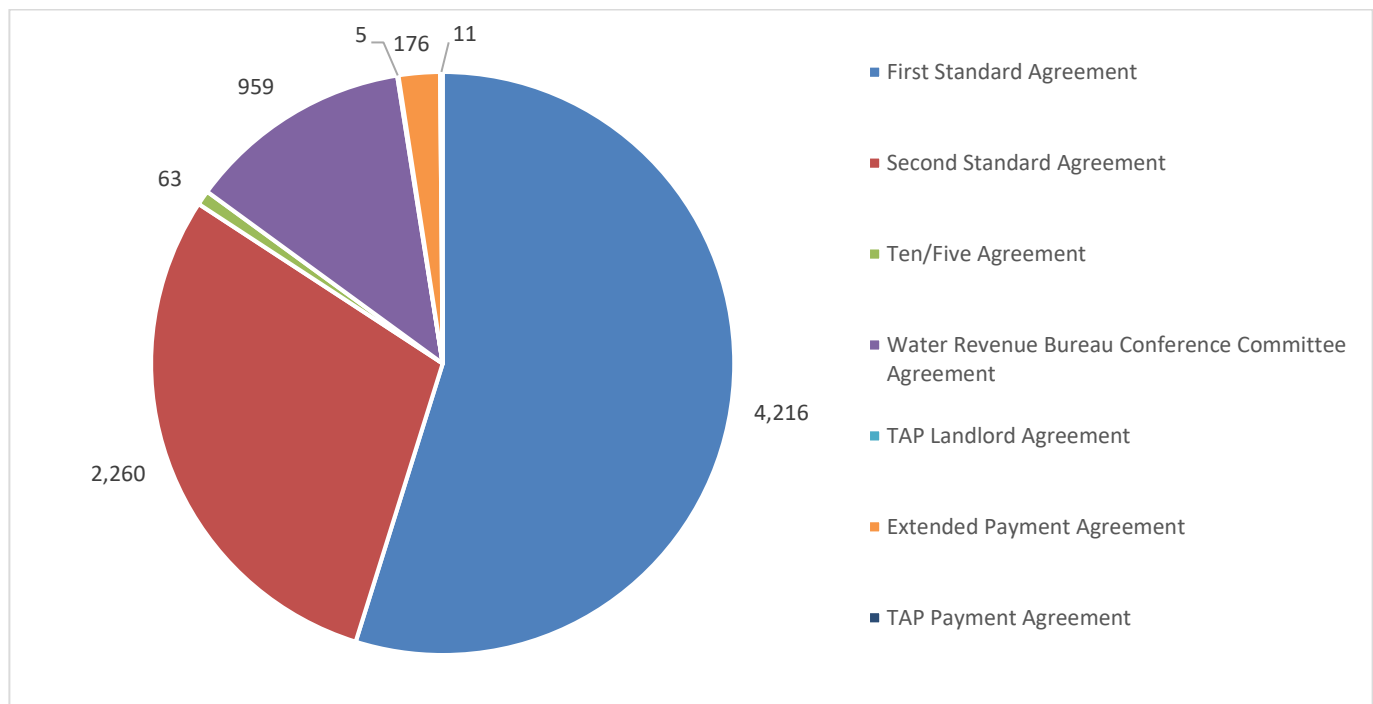


Figure 3. Non-TAP Residential Payment Agreements Active as of 12/31/19

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.

RAVONNE A. MUHAMMAD
Municipal Services Building
1401 J.F. Kennedy Boulevard, 2nd Floor
Philadelphia, PA 19102

PROFILE

- Well-rounded background in human resources, training, administrative operations and customer relations.
- Highly analytical, with a focus on problem solving based upon departmental regulations and policies
- Excellent experience developing and maintaining a variety of programs, including those that must comply with mandated guidelines
- Experienced in writing and delivering presentations for executive meetings.

EXPERIENCE

CITY OF PHILADELPHIA, FINANCE DEPARTMENT, Philadelphia PA
February 2017 to Present

Assistant to the Director of Finance, Water Revenue Assistance Division

Within the Philadelphia Department of Revenue's Water Revenue Bureau, manage a division of four supervisors and twenty-seven line staff to implement new assistance programs introduced by City ordinance. Review and implement standard operating procedures for division and department. Conduct meetings and trainings for new policies and procedures and maintain staffing and budget according to Revenue human resources. Review and utilize multiple databases for reporting, metrics, and customer service

CITY OF PHILADELPHIA, DEPARTMENT OF REVENUE, Philadelphia PA
February 2009 to February 2017

Customer Representative Supervisor, Water Revenue Bureau Assistance Unit
December 2015 to February 2017

Supervised staff of nine employees who review and process low income payment agreement applications for water and sewer accounts. Reviewed processed applications, approved special term agreements, and reviewed specially assigned accounts from Director and Manager as needed. Assigned staff to attend community outreach events and assisted as acting Manager when required.

Customer Representative Supervisor, Water Revenue Informal Hearing Unit
June 2012 to December 2015

Supervised staff of six employees who review water disputes and reviewed prepared cases to be presented at Informal Hearings and resulting adjustments. Reviewed specially assigned accounts from Deputy Commissioner as needed and provided feedback for rate mediation and Water Department regulations as applied to billing. Acted as contact for new City employees for compliance for Water Revenue debt and provided payment arrangements for City employees for delinquent water bills.

Revenue Customer Representative, Water Revenue Tax Review Board and Informal Hearing Unit

March 2012 to June 2012

Reviewed and prepared water account histories for hearings to be presented before Tax Review Board, submitted adjustments based upon detailed review of accounts and Board decisions. Contacted and met with customers regarding hearings and account review and presented cases to Board. Presided over Informal Hearing cases with customers and render decisions based upon evidence presented by customer and designated City representative.

Collection Customer Representative, Water Revenue Account Analysis Unit

February 2009 to March 2012

Acted as point of contact for Community Legal Services, reviewed water accounts and submitted documents for accuracy for determination of course of action based upon Bureau regulations and policies, analyzed water accounts based on customer and internal inquiries to determine if billing is correct and inform customers of results in writing, and submitted adjustments when determined to be necessary based on billing or meter information. Reviewed and processed applications for Water Revenue Assistance Unit for payment agreements based upon customer income and assisted former supervisor with weekly report submission, training, manual development and other duties as needed.

CITY OF PHILADELPHIA, RECREATION DEPARTMENT, Philadelphia PA

December 1994 to February 2009

Clerk III, Recreation Human Resources Management Administration

July 2006 to February 2009

Administered service award program, including determining and ordering awards for years of service. Administered human resources information to employees regarding time usage, pay, personnel information and pension. Received and reviewed requests from employees for information related to personnel information. Managed and input payroll for over 200 permanent, part-time and temporary employees.

Clerk III/Secretary, Recreation Program Division

June 2001 to July 2006

Solely responsible for maintaining department's compliance for state mandated Temporary Assistance for Needy Families program for After School Program, Established and maintained detailed database of department's city-wide after school program comprised of nearly 1800 children. Prepared monthly reports related to participants' attendance, data received, and need for additional information and trained employees as to process for administering required paperwork for T.A.N.F. program, and received and reviewed submitted paperwork to ensure T.A.N.F. compliance

Customer Service Representative, Recreation Commissioner's Office

December 1994 to June 2001

Worked directly with Commissioner in daily operations of office, communicated with Deputy Commissioners and upper level management, as well as other City department offices for meetings, events, etc. Maintained Commissioner's schedule and written correspondence and assisted in various special projects, events, and general assistance to public requesting information.

EDUCATION

TEMPLE UNIVERSITY

2003-2006

Undergraduate studies in Sport and Recreation Management

HAMPTON UNIVERSITY

1992-1993

Undergraduate studies in Political Science