



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

Department of Revenue

Calendar Year 2020

March 31, 2021



**City of
Philadelphia**



**CITY OF PHILADELPHIA
DEPARTMENT OF REVENUE**

March 31, 2021

The Honorable James Kenney
Mayor, City of Philadelphia
City Hall, Room 215
Philadelphia, PA 19107

Dear Mayor Kenney:

Enclosed is the Department of Revenue's fifth annual Report to the Mayor on the Tiered Assistance Program (TAP). The report, required under Philadelphia Code Section 19-1605(7), provides metrics for calendar year 2020. During 2020, the Water Revenue Bureau (WRB) and Philadelphia Water Department (PWD) have worked to significantly improve application processing time with the introduction of more online features. Building on efforts made to improve the application process highlighted in last year's report, WRB and PWD continued that work with additional improvements that include providing customers with the option to recertify online and with the option to upload additional documents via the online application portal when their applications are incomplete. Expanding the features of the online application portal shortens the total application processing time as it circumvents the potential for any mail delays, which was a reported customer concern. The new feature also has great potential for cost savings since no paper or postage is required for the online process.

In light of COVID-19, an even greater emphasis was placed on customer outreach and communication, which included outreach campaigns to inform customers of the options available to help repay missed TAP bills and new program component of pre-TAP debt forgiveness. Similarly, the City was able to maintain its highly responsive customer service even with a limited staff, by deploying remote resources to focus on processing customer assistance applications, responding to customer inquiries by phone, and even meeting safely with customers in person to provide additional service.

Very truly yours,

Commissioner Frank Breslin, CPA
Chief Collections Officer

FB/mnm

Enclosure

cc: Darrell L. Clarke, City Council President
Michael A. Decker, Chief Clerk of the City Council

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1. EXECUTIVE SUMMARY

The City of Philadelphia has completed the third 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, enacted in 2015 and the rate determinations by the Philadelphia Water, Sewer, and Stormwater Rate Board in 2016 and 2018. TAP provides for participating customers' bills to be capped at between 2% and 4% of their household income based on their household income compared with current Federal poverty guidelines. 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 fifth such report and covers calendar year 2020. During this reporting period, the City improved program access by implementing the online recertification process and by adding the ability for customer to upload requested information directly to the application portal. Previously, the only method for customers to provide additional requested documents and information was either by mail or in person.

The City also made great efforts to reach out to customers regarding new benefits added to the program and changes made to it during the year in response to COVID-19. The City made improvements to the customer-facing letters sent as a part of the application process by revising the text to more clearly state what data and/or documentation is missing from their applications and must be provided in order to complete the applications.

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, Residential Payment Agreements, and Customers Defaulting from TAP. **Between January 1 and December 31, 2020, the City had fully processed over 9,650 applications and had enrolled 4,791 customers in TAP.** The number of incoming applications and new enrollees were significantly lower in 2020 owing to the reduction in application activity, which is likely a result of COVID-19. See Figure 1 for 2020 TAP Enrollees by Federal poverty guidelines.

In December 2020, there were 16,433 active TAP participants. The term Active TAP participants is defined as customers that were issued a TAP bill during the calendar month. Together, TAP enrollees during 2020 had approximately \$10.7M in water account arrears at the time of enrollment. In addition to those enrolled in TAP, there were 4,859 applicants that were placed in a program other than TAP because it was determined to be more affordable or were not placed on a program because their applications were denied (see Figure 2).

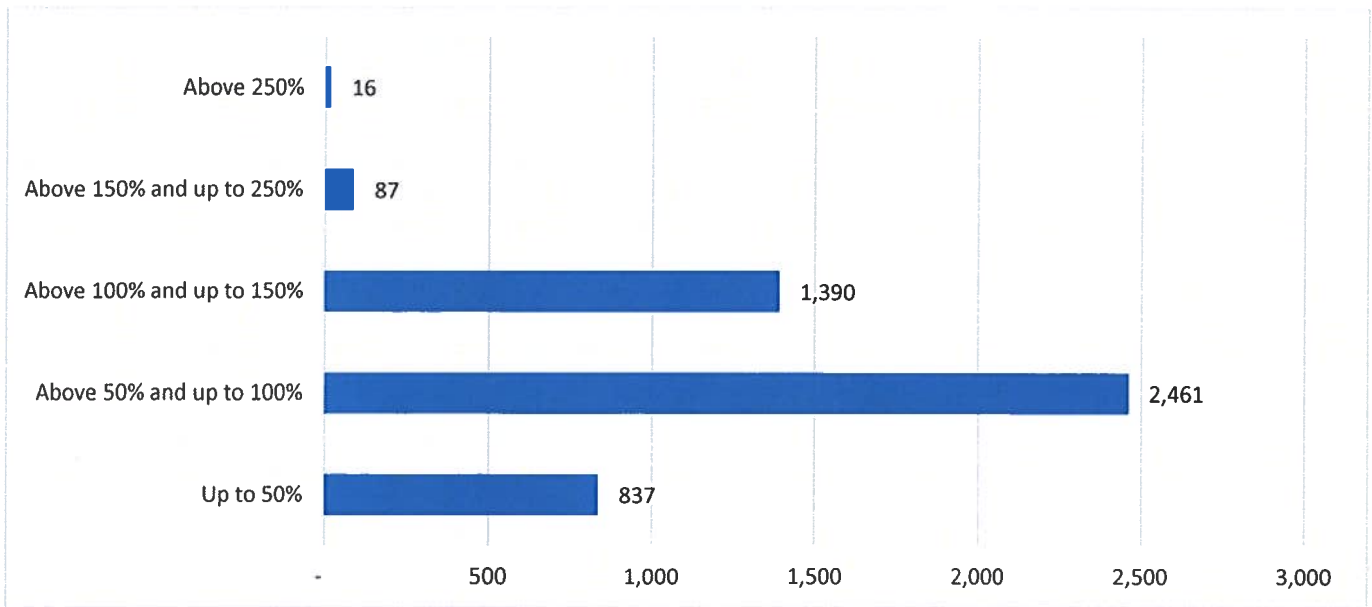


Figure 1. 2020 TAP Enrollees by Federal Poverty Guidelines (total: 4,791)

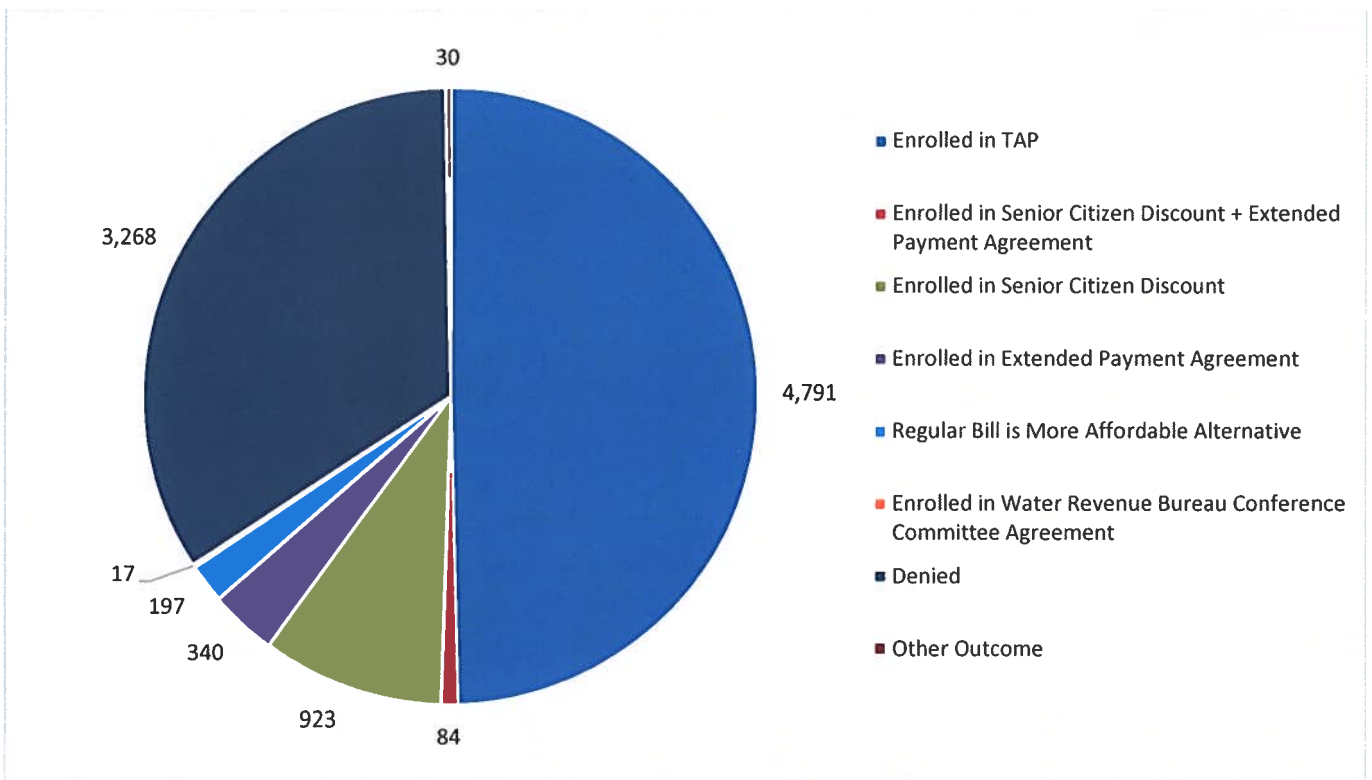


Figure 2. 2020 Customer Assistance Application Outcomes (total: 9,650)

In addition to TAP enrollment, this document reports on Residential Payment Agreements. **As of December 31, 2020, there were 5,169 active residential payment agreements.** Of these agreements, 2,955 agreements were created during 2020, while 2,214 agreements were created in previous years and were still ongoing. Active residential agreements created in 2020 cover just over \$4.9M in principal debt, \$600,000 in penalties and \$110,000 in other fees (such as returned check fees). See Figure 3 below for a breakdown of all agreements by type.

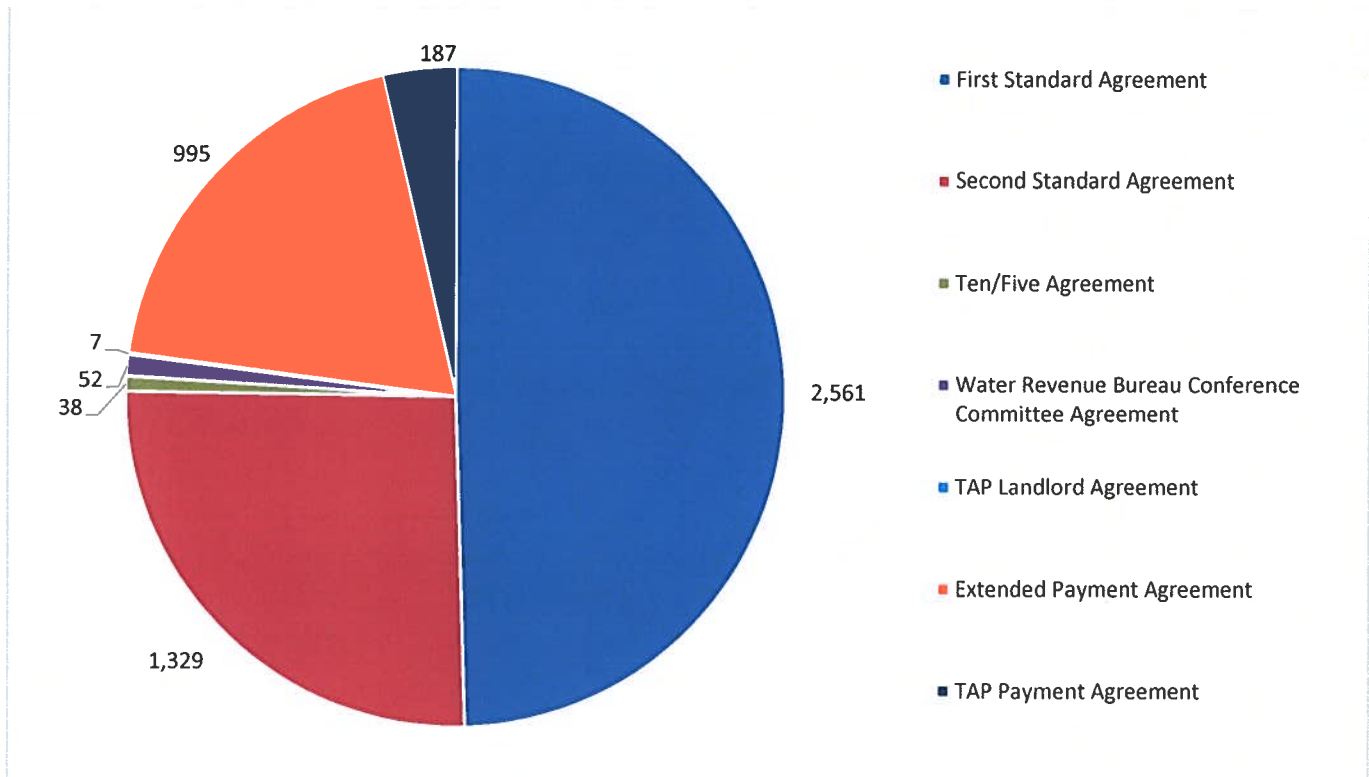
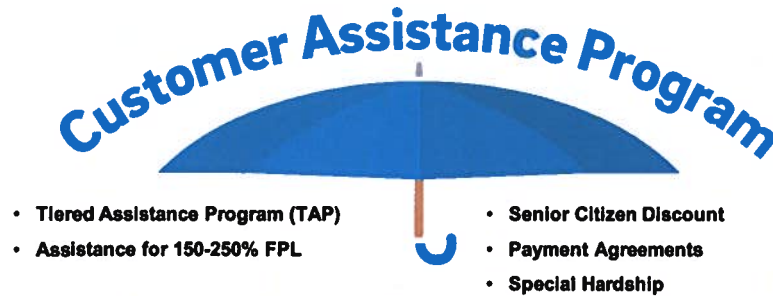


Figure 3. Residential Payment Agreements Active as of 12/31/20 (total: 5,169)

2. INTRODUCTION

The City of Philadelphia's Tiered Assistance Program (TAP) has now completed its third full year. TAP was established in July of 2017 for residential customers who meet low-income or special hardship criteria pursuant to Section 206.0 through 206.10 of Philadelphia Water Department (PWD) Regulations. In 2017, application for and enrollment in other Customer Assistance Programs offered by Water Revenue Bureau (WRB) were streamlined into a single application and evaluation process. During 2020, the program has continued to evolve and mature, with added features to make the customer's experience of applying for assistance easier and faster.



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 no later than 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 is an innovative assistance program that bases qualifying customers' combined water, wastewater, and stormwater bill on their ability to pay and **now allows them to earn forgiveness of their pre-TAP debt after 24 full TAP payments**. 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 their household income compared with current Federal poverty guidelines. For monthly gross income limits based on household size for the calendar year 2020, see Table 1 below.

- If a customer's household gross monthly income is at or below 50% of the Federal poverty guidelines, 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 guidelines, 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 guidelines 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 guidelines 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 2020

Eligible Monthly Income Levels		
Household Size	Maximum Gross Income (150% of FPL)	Maximum Gross Income (250% of FPL)
1 Person	\$1,595/ month	\$2,658/ month
2 People	\$2,155/ month	\$3,592/ month
3 People	\$2,715/ month	\$4,525/ month
4 People	\$3,275/ month	\$5,458/ month
5 People	\$3,835/ month	\$6,392/ month
6 People	\$4,395/ month	\$7,325/ month
7 People	\$4,955/ month	\$8,258/ month
8 People	\$5,515/ month	\$9,192/ month
<i>For each additional person:</i>	Add \$560 to the amount above	Add \$933 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 back debt or a balance on their account 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. Note that a customer’s back debt related to HELP loans or meter and repair charges are not covered under 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. Although customers can request an unlimited number of applications, after the third request, the stay is no longer available. However, for the majority of 2020, customers did not need to take advantage of this program benefit as there was no enforcement for most of the year, starting on March 16th with the extension of the City's regular seasonal shut-off moratorium in response to the economic effects of the COVID-19 pandemic.

Once customers are enrolled, pre-TAP penalties are forgiven after they make 24 full TAP payments. Beginning on September 1, 2020, program changes were implemented to also provide full forgiveness of the total pre-TAP principal debt amount on an account after 24 full TAP payments.

2.2 2020 HIGHLIGHTS

In 2020 PWD and WRB made a number of changes to the TAP program to introduce new features and improve upon others. Many changes were also made to accommodate customer feedback and to maintain various operations in light of COVID-19. New features added during the year included launching pre-TAP principal forgiveness and adding the option for customers to upload documents in response to requests for additional information. Improvements made to existing features included changes to the recertification process and updates to existing letters as well as adjustments to the overall department operations to manage the impact of COVID-19.

Beginning on September 1, 2020, **customers were able to earn forgiveness on their pre-TAP principal debt by making 24 full TAP payments.** This new benefit is in addition to the existing ability to earn forgiveness on pre-TAP penalty charges, which has been in place since program inception in 2017. The benefit allows customers to take advantage of the affordable rate provided by TAP while also working towards forgiveness of their pre-TAP debt, without being required to pay an additional amount. Note that principal forgiveness does not impact the pre-TAP debt amounts provided in this report as those amounts are as of the time of TAP approval and any debt that has since been forgiven is still included in those amounts. Pre-TAP Principal forgiveness is a significant new benefit for TAP customers.

A significant amount of planning and design work was performed to enhance the recertification process, which has been in operation since 2018. The **recertification process was enhanced with the addition of functionality that allows customers to recertify online.** Previously, customers were only able to recertify for the program by using a paper application. Now customers have the option to recertify by submitting an online application as well. In addition to improving the recertification process, WRB added functionality to the online application so that customers could provide documentation in response to requests for additional information online. This enhancement allows customers to upload documents directly to the website in response to those requests.

Based on feedback provided from customers, WRB made **two updates to the letters that request additional information from the applicant or other household members.** Previously, a letter sent to customers would request information that is outstanding for one of the household members, but would not specify the person, which has been reported by customers to be confusing for multiple member households. The update improves the process by making the information request from WRB more precise and easier for the customer to interpret and respond to accurately. The second update to the letters was **adding the first page of the application package.** The page outlines the various forms of acceptable documentation, which is a helpful point of reference when submitting additional documentation.

Enhancements to customer letters differentiated the previous single denial letter into four letters to make them more suited to specific customer's circumstances. These letters cover the following circumstances:

1. A recertification application is denied and the customer's TAP participation ends.
2. A change of circumstance application is denied due to being incomplete and the customer stays enrolled in TAP.
3. A change of circumstance application is denied due to being a duplicate of another recently submitted application and the customer stays enrolled in TAP.
4. A new application is denied for any reason.

Creating new and separate versions of these letters allows for the addition of specific language to more clearly explain to the customer the reason for denial and the consequences.

Due to COVID-19, many WRB employees were asked to work from home. As a result, WRB initially had limited capacity to process applications or respond to customer inquiries. WRB quickly resolved this issue by providing resources to ensure that employees could work from home. As the City of Philadelphia permitted, there were provisions for a small number of employees to work in-person to continue with application processing and provide in-person service for customers in a socially distanced manner.

Customer Assistance Program knowledge transfer processes were also adapted in response to pandemic operating conditions. Previously, updated information about assistance programs had been provided to both the PWD Contact Center and the WRB Customer Assistance Division via in-person trainings. These trainings also served as an opportunity to gather customer feedback relayed to the Contact Center agents, which informs program improvements that have been implemented since the program launch in 2017. These trainings were suspended initially but resumed via virtual meetings later in the year as remote access was provided to employees and more employees resumed regular work.

During normal operations, customers are asked to recertify no more often than every 12 months, per regulations, and failure to recertify results in removal from TAP. In order to prevent customers from being removed from TAP during COVID-19, PWD and WRB suspended the recertification process in March 2020. As a result, no participants were asked to recertify and instead were able to continue on their existing plan unless they submitted a change of circumstance application or opted out of the program. Additional efforts to protect customers included the extension of payment agreements to prevent customers from breaching their current agreements.

To further protect customers during COVID-19, PWD and WRB took many steps to ensure that customers had water service, which included restoring water access and extending payment agreement terms. Starting on March 16th, all water shutoffs were postponed until further notice. PWD also restored water service to approximately 15,000 customers who had previously been shut off. That shut-off protection period has been extended multiple times and is currently set to expire later in 2021 but may be subject to further consideration based on public health demands. Focus has remained on customers' access to water despite the designation of certain PWD positions as non-essential. PWD has continued to provide critical water services to its customers by utilizing essential workers whose jobs are related to providing access to water.

Between January 1 and December 31, 2020, the City had fully processed 9,650 applications and had enrolled 4,971 customers in TAP. As of December 2020, there were 16,433 active TAP participants.

3. CUSTOMER OUTREACH AND SUPPORT

In 2020, communication with the City’s water customer base was paramount. There were ongoing efforts to inform customers about changes both within the Water Department as a whole as well as those specific to the TAP program. Much of the customer outreach effort was centered around encouraging customers to apply for TAP and providing information about recent program features and program updates. As described in the previous section, WRB also made enhancements to customer communication letters.

PWD asked customers with an existing Senior Citizen Discount to apply for updated assistance (using the new application). The benefits to customers included a potential lower bill, and potential for fixed monthly payment amount. There are also benefits for the city. Applications allowed Customer Accounts to be tracked under the newer back-end systems associated with the Customer Assistance Program redesign. The following actions were taken as a part of this effort:

- Mailed 1,600 personalized application form packages to senior customers in zip codes with highest rates of shutoff.
- Sent 16,000 full color mailers, with reply cards, promoting benefits for seniors and encouraging application (see Figure 4).
- Analyzed the outcomes. PWD compared data to see if variables including format, content, and inclusion of return postage impacted response rates.

The results were used to promote an evidence-based approach to outreach for this audience.

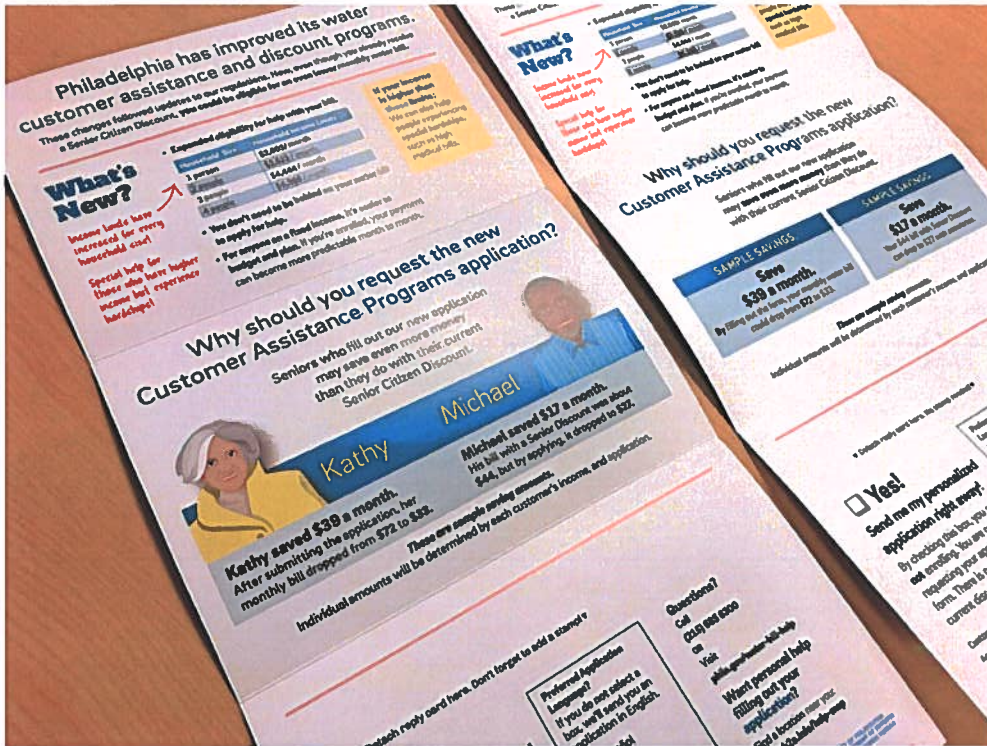


Figure 4 Persona vs. No Persona Full Color Mailers

WRB and PWD also initiated a compassionate outreach campaign in late 2020, as an effort to contact a group of around 2,000 TAP customers with past due TAP bill balances to assist them with resolving their balances. Customers were also informed about the newly added benefit of pre-TAP principal debt forgiveness described in this report. Customers were encouraged to submit a new application if their circumstances had changed, and they could benefit from being considered for a more affordable plan. This was the first phase of outreach to our customers impacted by COVID-19.

An effort to protect unpaid TAP debt is currently underway and is expected to be in place by late Spring 2021. The debt protection initiative will protect TAP customers from paying the full amount of the debt when the City's enforcement activities eventually resume. As a result, a TAP customer would not be shut-off because of this debt. The debt protection will only take place one time and will only apply to unpaid TAP bills and unpaid TAP Payment Agreements accumulated up to the point of protection.

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, 2020, the City enrolled **4,791 customers in TAP**. This number is much lower than previous years owing to an overall reduction in application activity, in part because WRB stopped requesting that customers recertify during COVID-19. This reduction in new TAP customers enrolled is also proportionately reflected in the pre-TAP debt. The enrollees had **approximately \$10.7M 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 guidelines.

Table 2. New Applicants Enrolled in TAP in 2020

Income Level as Compared to Federal Poverty Guidelines	Total Enrollees	Total Pre-TAP Debt¹
Up to 50%	837	\$1,694,405.96
Above 50% and up to 100%	2,461	\$5,511,963.44
Above 100% and up to 150%	1,390	\$3,032,086.78
Above 150% and up to 250%	87	\$354,632.38
Above 250%	16	\$90,764.16
Total	4,791	\$10,683,852.72

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.

Table 3. Total Debt of Applicants Enrolled in TAP in 2020

Debt Range	Total Enrollees	Total Pre-TAP Debt^{1,2}
< \$0	109	\$(7,371.09)
\$0-\$200	1,605	\$101,044.83
\$200-\$500	613	\$207,210.36
\$500-\$1,000	543	\$390,906.83
\$1,000-\$2,000	507	\$742,675.86
\$2,000-\$5,000	718	\$2,376,408.88
\$5,000-\$10,000	458	\$3,223,749.74
\$10,000-\$20,000	199	\$2,631,675.89
\$20,000-\$50,000	38	\$936,676.37
\$50,000+	1	\$73,503.96
Total	4,791	\$10,676,481.63

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 3).

4.2 APPLICANTS NOT ENROLLED IN TAP

In addition to the 4,791 applicants enrolled in TAP (see Table 2, above) during 2020, 4,859 applicants were not enrolled in TAP. This group includes 1) applicants who were denied for ineligibility or an incomplete application 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.

Table 4. Applicants Not Enrolled in TAP

Outcome	Count
Denied	
Failed to meet Income and Residency Guidelines	5
Failed to meet Income Guidelines (no special hardship)	167
Failed to meet Residency Guidelines	338
Installation Type Not Eligible for TAP	7
Missing or Invalid Income or Residency Documentation	2,574
Missing information on application form	177
Total Denials	3,268
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill ³	84
Senior Citizen Discounted Bill + Extended Payment Agreement	923
Regular Bill ⁴	340
Regular Bill + Extended Payment Agreement	197
WRBCC Agreement	17
Total More Affordable Alternative Placements	1,561
Other Outcomes	
Customer Withdrew Application	0
Data Transfer ⁵	29
Duplicated Application	1
Total Other Outcomes	30
Total Applicants Not Enrolled in TAP	4,859

³ Senior Citizen Discounted Bill may also include a standard payment agreement. Standard agreements are reported in Section 4.3, below.

⁴ Regular Bill may also include a standard payment agreement. Standard agreements are reported in Section 4.3, below.

⁵ 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 RESIDENTIAL PAYMENT AGREEMENTS

As of December 31, 2020, there were 5,169 active payment agreements between residential water customers and WRB (See Figure 3 above). Of these agreements, 2,955 (57%) were created in 2020, while 2,214 (43%) were created in previous years and were still ongoing as of the end of 2020. The number of active agreements created in prior years is larger than it has been historically. In part, this is due to agreements not breaching due to the COVID-19 protections put in place in 2020. Another portion of these active agreements is due to a recently identified issue with automatically breaching agreements for non-payment. WRB is currently working on this issue and expects to resolve it prior to restarting the arrears process in 2021. 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 enrolled in the TAP program 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 2,955 active residential agreements created in 2020 were made up of 1,702 First Standard Agreements, 686 Second Standard Agreements, 19 Water Revenue Bureau Conference Committee (WRBCC) Agreements, 388 Extended Payment Agreements, 158 TAP Payment Agreements, and 2 TAP Landlord Agreements. WRBCC is a legacy program that was created and enrolled many of its participants before the implementation of TAP. Active residential agreements created in 2020 cover just over \$4.9M in principal debt, \$600,000 in penalties and \$110,000 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, 2020 by term range along with the principal, penalties, and other fees covered under the agreements. Table 5 shows information for agreements created in 2020; Table 6 shows agreements created before 2020; and Table 7 shows all agreements (the sum of agreements shown in Table 5 and Table 6).

As of December 31, 2020, there were 26,097 customers enrolled in the Senior Citizen Discount (SCD) program, some of which were enrolled prior to the new customer assistance application process implemented in 2017.

Table 5. Active (as of 12/31/20) Residential Agreements Created in Calendar Year 2020

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	575	\$411,982.87	\$17,424.93	\$4,486.65
13–24 Months	877	\$954,218.13	\$72,810.06	\$16,963.96
25–36 Months	138	\$293,655.76	\$41,351.07	\$9,348.21
37–48 Months	49	\$138,482.39	\$25,326.67	\$5,677.58
49–60 Months	62	\$346,829.50	\$63,618.28	\$8,656.05
>60 Months	1	\$2,322.11	\$721.51	\$70.00
Total First Standard Agreements	1,702	\$2,147,490.76	\$221,252.52	\$45,202.45
Second Standard Agreements				
0–12 Months	198	\$188,178.47	\$21,404.92	\$4,132.20
13–24 Months	259	\$302,822.54	\$28,088.30	\$6,361.65
25–36 Months	115	\$208,905.96	\$36,231.72	\$7,352.55
37–48 Months	43	\$134,501.97	\$26,987.88	\$4,835.10
49–60 Months	71	\$375,393.00	\$51,442.19	\$8,983.10
Total Second Standard Agreements	686	\$1,209,801.94	\$164,155.01	\$31,664.60
WRBCC Agreements⁶				
0–12 Months	13	\$41,628.53	\$5,224.96	\$268.90
13–24 Months	6	\$13,800.80	\$1,256.03	\$121.45
Total WRBCC Agreements	19	\$55,429.33	\$6,480.99	\$390.35
Extended Payment Agreements				
13–24 Months	51	\$48,419.98	\$3,448.87	\$1,337.36
25–36 Months	34	\$43,832.41	\$3,370.77	\$1,653.20
37–48 Months	25	\$42,681.05	\$5,484.82	\$1,618.85
49–60 Months	29	\$60,773.74	\$7,075.71	\$1,831.75
>60 Months	249	\$1,218,121.24	\$183,164.59	\$25,538.46
Total Extended Payment Agreements	388	\$1,413,828.42	\$202,544.76	\$31,979.62
TAP Payment Agreements				
0–12 Months	153	\$78,127.64	\$-	\$80.00
13–24 Months	5	\$6,026.15	\$179.57	\$20.00
Total TAP Payment Agreements	158	\$84,153.79	\$179.57	\$100.00
TAP Landlord				
37–48 Months	1	\$1,294.34	\$-	\$111.45
>60 Months	1	\$5,070.93	\$-	\$20.00
Total TAP Landlord	2	\$6,365.27	\$-	\$131.45
Total of all Agreements	2,955	\$4,917,069.51	\$594,612.85	\$109,468.47

⁶ In response to COVID-19, some WRBCC agreements were created or extended outside of the regular application process in order to prevent the possibility of customers breaching their agreements.

Table 6. Active (as of 12/31/20) Residential Agreements Created Before 2020

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	152	\$191,749.82	\$22,179.02	\$3,366.21
13–24 Months	355	\$348,487.02	\$34,436.80	\$7,944.19
25–36 Months	141	\$338,219.82	\$39,821.75	\$7,621.35
37–48 Months	79	\$334,286.79	\$37,075.15	\$6,223.95
49–60 Months	131	\$900,560.69	\$181,367.21	\$16,334.54
>60 Months	1	\$5,020.91	\$4,115.33	\$80.00
Total First Standard Agreements	859	\$2,118,325.05	\$318,995.26	\$41,570.24
Second Standard Agreements				
0–12 Months	101	\$110,531.67	\$16,123.22	\$3,243.50
13–24 Months	200	\$217,708.82	\$24,776.75	\$5,123.42
25–36 Months	141	\$285,179.00	\$39,200.03	\$6,875.93
37–48 Months	80	\$217,537.70	\$43,032.51	\$4,876.40
49–60 Months	121	\$603,162.60	\$122,645.74	\$10,986.25
Total Second Standard Agreements	643	\$1,434,119.79	\$245,778.25	\$31,105.50
Ten/Five Agreements				
37–48 Months	1	\$924.69	\$239.93	\$10.00
49–60 Months	35	\$136,045.76	\$17,307.73	\$760.00
>60 Months	2	\$8,857.71	\$1,606.23	\$10.00
Total Ten/Five Agreements	38	\$145,828.16	\$19,153.89	\$780.00
WRBCC Agreements⁷				
13–24 Months	33	\$103,651.92	\$10,759.32	\$600.90
Total WRBCC Agreements	33	\$103,651.92	\$10,759.32	\$600.90
Extended Payment Agreements				
13–24 Months	71	\$77,166.03	\$6,478.54	\$1,703.20
25–36 Months	70	\$106,301.95	\$11,727.02	\$3,727.85
37–48 Months	61	\$131,210.94	\$13,982.27	\$3,145.95
49–60 Months	44	\$105,735.07	\$12,512.67	\$2,365.83
>60 Months	361	\$2,049,663.90	\$339,574.40	\$30,756.27
Total Extended Payment Agreements	607	\$2,470,077.89	\$384,274.90	\$41,699.10
TAP Payment Agreements				
0–12 Months	27	\$16,140.03	\$-	\$104.95
13–24 Months	1	\$311.48	\$-	\$-
25–36 Months	1	\$996.38	\$-	\$-
Total TAP Payment Agreements	29	\$17,447.89	\$-	\$104.95
TAP Landlord				
13–24 Months	1	\$2,113.78	\$-	\$-
37–48 Months	1	\$1,900.42	\$-	\$20.00
>60 Months	3	\$19,147.56	\$-	\$242.90
Total TAP Landlord	5	\$23,161.76	\$-	\$262.90
Total of all Agreements	2,214	\$6,312,612.46	\$978,961.62	\$116,123.59

⁷ Some of the WRBCC agreements reflect administrative extensions that changed the duration of the agreement, but not the start date. As a result, they did not appear in last year's report as 13-24 month long agreements created in 2019.

Table 7. Summary of All Active (as of 12/31/20) Residential Agreements

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	727	\$603,732.69	\$39,603.95	\$7,852.86
13–24 Months	1,232	\$1,302,705.15	\$107,246.86	\$24,908.15
25–36 Months	279	\$631,875.58	\$81,172.82	\$16,969.56
37–48 Months	128	\$472,769.18	\$62,401.82	\$11,901.53
49–60 Months	193	\$1,247,390.19	\$244,985.49	\$24,990.59
>60 Months	2	\$7,343.02	\$4,836.84	\$150.00
Total First Standard Agreements	2,561	\$4,265,815.81	\$540,247.78	\$86,772.69
Second Standard Agreements				
0–12 Months	299	\$298,710.14	\$37,528.14	\$7,375.70
13–24 Months	459	\$520,531.36	\$52,865.05	\$11,485.07
25–36 Months	256	\$494,084.96	\$75,431.75	\$14,228.48
37–48 Months	123	\$352,039.67	\$70,020.39	\$9,711.50
49–60 Months	192	\$978,555.60	\$174,087.93	\$19,969.35
Total Second Standard Agreements	1,329	\$2,643,921.73	\$409,933.26	\$62,770.10
Ten/Five Agreements				
37–48 Months	1	\$924.69	\$239.93	\$10.00
49–60 Months	35	\$136,045.76	\$17,307.73	\$760.00
>60 Months	2	\$8,857.71	\$1,606.23	\$10.00
Total Ten/Five Agreements	38	\$145,828.16	\$19,153.89	\$780.00
WRBCC Agreements				
0–12 Months	13	\$41,628.53	\$5,224.96	\$268.90
13–24 Months	39	\$117,452.72	\$12,015.35	\$722.35
Total WRBCC Agreements	52	\$159,081.25	\$17,240.31	\$991.25
Extended Payment Agreements				
13–24 Months	122	\$125,586.01	\$9,927.41	\$3,040.56
25–36 Months	104	\$150,134.36	\$15,097.79	\$5,381.05
37–48 Months	86	\$173,891.99	\$19,467.09	\$4,764.80
49–60 Months	73	\$166,508.81	\$19,588.38	\$4,197.58
>60 Months	610	\$3,267,785.14	\$522,738.99	\$56,294.73
Total Extended Payment Agreements	995	\$3,883,906.31	\$586,819.66	\$73,678.72
TAP Payment Agreements				
0–12 Months	180	\$94,267.67	\$-	\$184.95
13–24 Months	6	\$6,337.63	\$179.57	\$20.00
25–36 Months	1	\$996.38	\$-	\$-
Total TAP Payment Agreements	187	\$101,601.68	\$179.57	\$204.95
TAP Landlord				
13–24 Months	1	\$2,113.78	\$-	\$-
37–48 Months	2	\$3,194.76	\$-	\$131.45
>60 Months	4	\$24,218.49	\$-	\$262.90
Total TAP Landlord	7	\$29,527.03	\$-	\$394.35
Total of all Agreements	5,169	\$11,229,681.97	\$1,573,574.47	\$225,592.06

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 2020, there were 1,436 cases of TAP participants defaulting from TAP, all for failure to successfully recertify. Per regulations, WRB may request that customers recertify no more often than once every twelve months. At the time of recertification, customers are asked to submit updated income and residency information. Failure to provide the requested information results in removal from the program. WRB was requesting that customers recertify until March 13, at which time recertification requests were paused. Of those customers that were asked to recertify, 647 did not respond to the recertification request in a timely manner, 673 were denied for cause, and 116 were enrolled in a more affordable alternative. Table 8 below describes the outcome of these recertification applications. Although the recertification process was turned off for the majority of the year and fewer applications were submitted, there were some customers that did go through the process prior. As a result, there were a number of customers that were denied for standard reasons related to the recertification process, and subsequently defaulted from TAP.

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	647
Denied	
Failed to meet Income and Residency Guidelines	1
Failed to meet Income Guidelines (no special hardship)	16
Failed to meet Residency Guidelines	44
Installation Type Not Eligible for TAP	0
Missing or Invalid Income or Residency Documentation	563
Missing information on application form	46
Data Transfer	3
Total Denials	673
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill	11
Senior Citizen Discounted Bill + Extended Payment Agreement	36
Regular Bill	46
Regular Bill + Extended Payment Agreement	23
Total More Affordable Alternative Placements	116
Total Customers Defaulting from TAP	1,436

5. CONCLUSION

The City has continued to administer a complex and rapidly changing customer assistance program amidst COVID-19 which had major impacts on the City's daily operations. The primary focus was maintaining service and support to customers while minimizing any negative impacts.

During 2020, WRB **enrolled 4,791 customers in TAP. As of December 2020, there were 16,433 active TAP participants.** Some of these customers were in their fourth year of TAP participation in 2020. Ongoing efforts to improve on established processes and communications have helped allow the program to operate more smoothly and to accommodate the constantly changing circumstances of the year.