

An aerial photograph of Philadelphia, Pennsylvania, showing the city skyline with various skyscrapers and buildings. The Schuylkill River flows through the center of the image, with a highway and green spaces visible along its banks. The sky is clear and blue.

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

Department of Revenue

Calendar Year 2021

March 31, 2022



**City of
Philadelphia**



March 31, 2022


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 sixth 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 2021. During the year, the Water Revenue Bureau and Water Department have worked to significantly enhance the program's functionality and overall customer protection. The efforts enacted this year included protecting customers who accumulated debt because of the financial impacts of COVID-19. As a result, customers were allowed to maintain service without being immediately responsible for the accumulated debt. Additional work was done to provide clarity to the application process with an updated customer assistance application checklist that was implemented in February 2022. The Department has also been involved in facilitating the disbursement of grant money provided to customers. Distribution of the grants provided by the Philadelphia Housing Development Corporation (PHDC) began in 2021 and continue to be distributed in 2022. Grants from the Utility Emergency Services Fund (UESF) also continue to provide significant financial assistance to eligible PWD customers.

The City launched several outreach, promotion, and advertising campaigns to increase awareness of the water bill assistance options available to customers struggling with their water bill. This included various advertisements around the city and public meetings to inform customers of the options they have to help reduce their water bills. PWD and WRB also started an internal project to review all Customer Assistance Program (CAP) related letters and revise their text and format in response to customer feedback on the complexity of the letters. Over the past year, TAP has continued its efforts to provide meaningful assistance to the water customers of Philadelphia.

Very truly yours,


Commissioner Frank Breslin
Chief Collections Officer

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 four and one half years 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 sixth such report and covers calendar year 2021. During this reporting period, the City restored the recertification process and also provided several one-time measures for additional assistance to TAP customers during COVID-19.

The City continued its efforts to encourage vulnerable citizens to enroll in its water assistance programs by using traditional methods such as mailers and advertisements as well as in-person outreach events. Additionally, the City solicited feedback from multiple stakeholders to improve the application checklist. The revised checklist clarifies the documents required to prove income and residency. This checklist launched in early 2022.

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, 2021, the City had fully processed over 12,000 applications and had enrolled 5,211 customers in TAP.** See Figure 1 for 2021 TAP Enrollees by Federal Poverty Guideline. **As of December 2021, there were 17,148 active TAP participants.** Together, TAP enrollees during 2021 had approximately \$11.1M in water account arrears at the time of enrollment. In addition to those enrolled in TAP, there were 7,556 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)

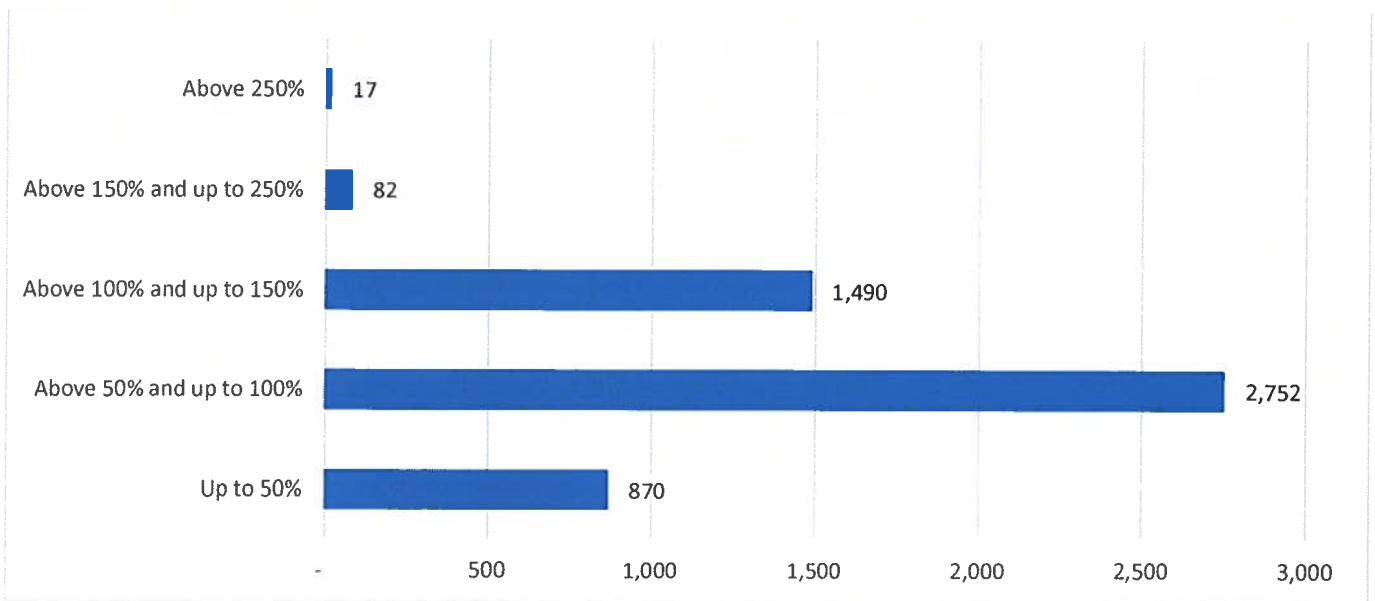


Figure 1. 2021 TAP Enrollees by Federal Poverty Guideline (total: 5,211)

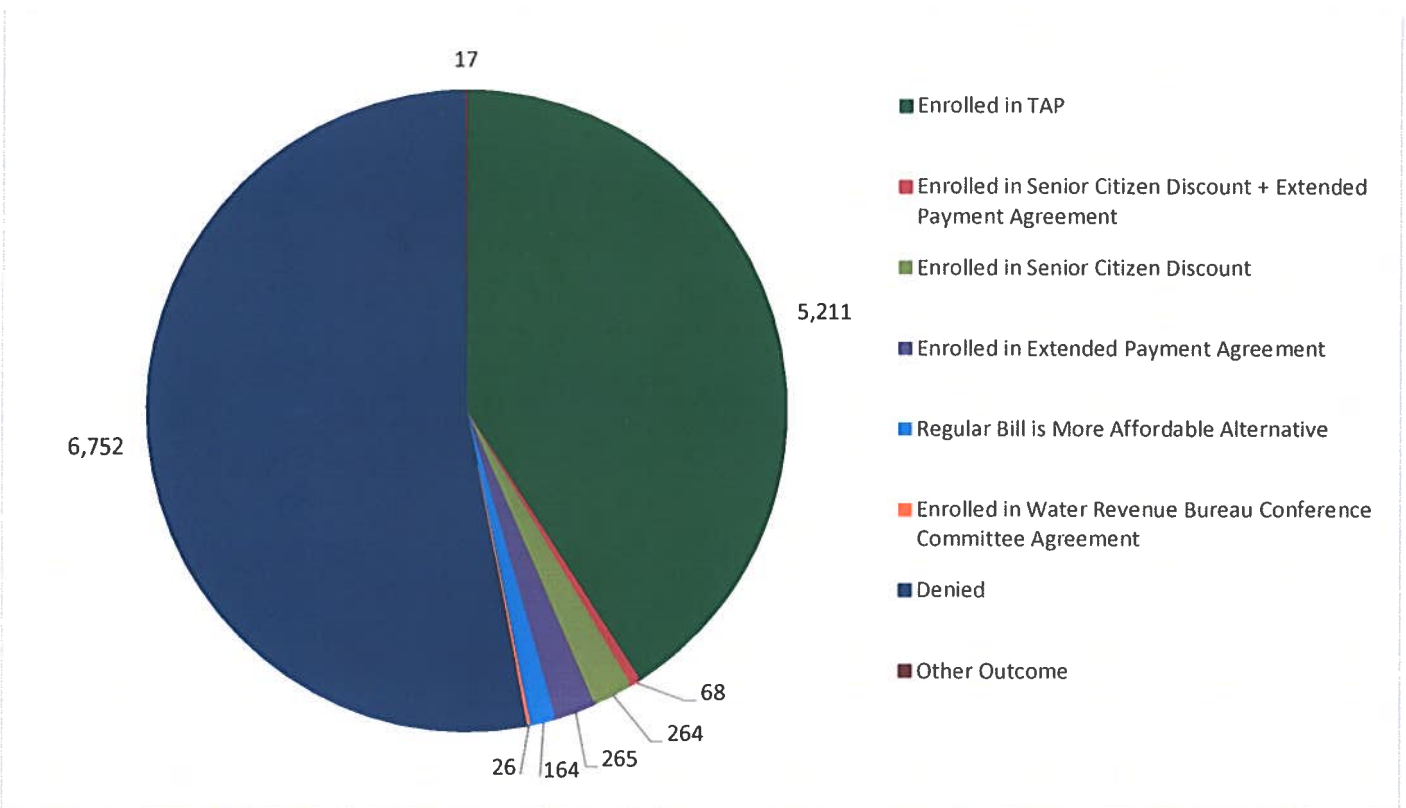


Figure 2. 2021 Customer Assistance Application Outcomes (total: 12,767)

In addition to TAP, this document also reports on non-TAP Payment Agreements. **As of December 31, 2021, there were 2,589 active residential payment agreements.** Of these agreements, 1,779 agreements were created in 2021, while 810 agreements were created in previous years and were still ongoing. Active residential agreements created in 2021 cover just over \$3.3M in principal debt, \$300,000 in penalties and \$80,000 in other fees (such as returned check fees). See Figure 3 below for a breakdown of all agreements by type. **As of December 31, 2021, there were 26,097 customers in the Senior Citizen Discount (SCD) program,** some of whom were in the program prior to the unified customer assistance application process that was implemented concurrently with the start of TAP in 2017.

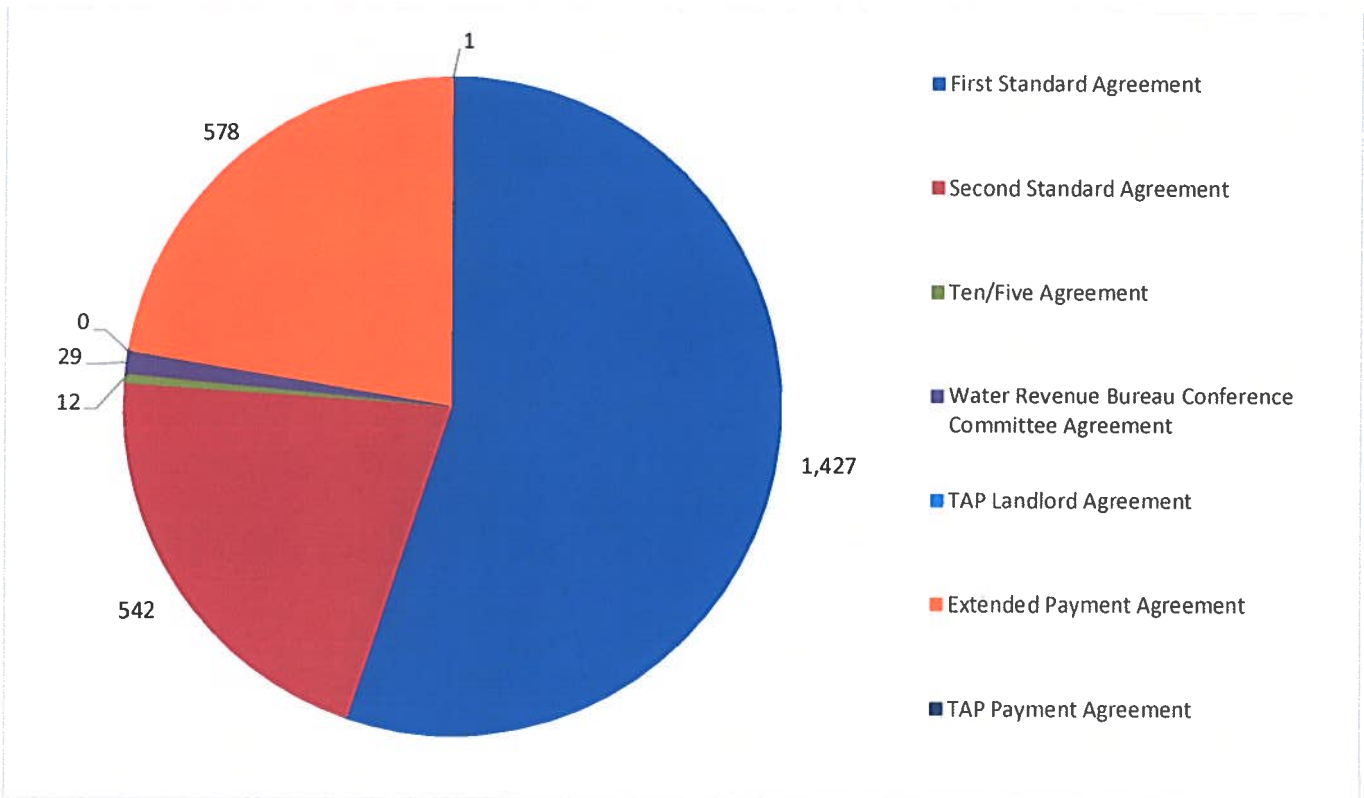
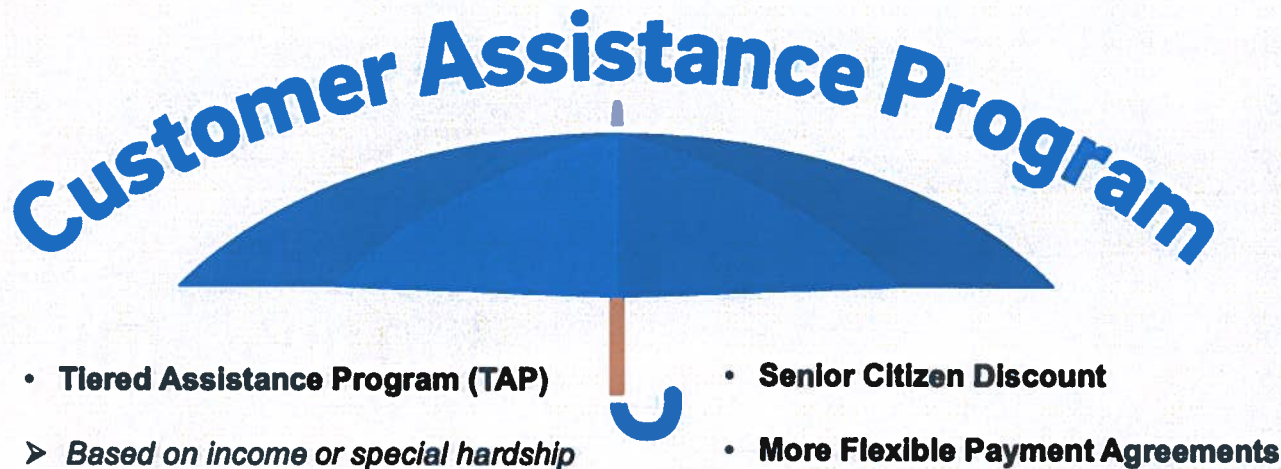


Figure 3. Non-TAP Residential Payment Agreements Active as of 12/31/21(total: 2,589)

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 same process. During 2021, the program has continued to make improvements and innovations by focusing on additional methods for serving its customers and implementing changes that created additional affordability measures.



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 the 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 household income stands with respect to the current Federal Poverty Guideline. For monthly gross income limits based on household size for the calendar year 2021, see Table 2 below.

Table 1. Maximum TAP Bill

Household Income to Federal Poverty Level Percentage	Bill as a percentage of Household Income
Below 50%	2%
Above 50% and at or below 100%	2.5%
Above 100% and at or below 150%	3%
Above 150%	4%

Table 2. Federal Poverty Guidelines for 2021

Household Size	Eligible Monthly Income Levels	
	Maximum Gross Income (150% of FPL)	Maximum Gross Income (250% of FPL)
1 Person	\$1,610 / month	\$2,683 / month
2 People	\$2,178 / month	\$3,629 / month
3 People	\$2,745 / month	\$4,575 / month
4 People	\$3,313 / month	\$5,521 / month
5 People	\$3,880 / month	\$6,467 / month
6 People	\$4,448 / month	\$7,413 / month
7 People	\$5,015 / month	\$8,358 / month
8 People	\$5,583 / month	\$9,304 / month
<i>For each additional person:</i>	Add \$568 to the amount above	Add \$946 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 includes but is not limited to the following:

- A. Increase in household size
- B. Loss of a job, lasting more than 4 months
- C. Serious illness of household member, lasting more than 9 months
- D. Death of primary wage earner
- E. Domestic violence or abuse
- F. High household expenses
- G. 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 is protected, meaning no enforcement action or collection activity will be taken on that debt while the customer is

participating in TAP. A customer's back debt related to HELP loans or meter and repair charges are not covered under TAP.

When a customer who is not currently active on an assistance program requests an assistance application, WRB provides a 14-calendar day stay of enforcement on the 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.

Once enrolled, the customer is able to receive Penalty Forgiveness and Principal Forgiveness. Penalty Forgiveness is the process by which TAP participants can have penalty charges forgiven after 24 full payments of their TAP bills. The Penalty Forgiveness program began in July of 2017. Principal Forgiveness is the process by which TAP participants can have their unpaid water bills forgiven after 24 full payments of their TAP bills. The Principal Forgiveness program began in September of 2020. Note that customers who exit TAP because they no longer qualify for TAP because their incomes exceed the income limits are provided partial forgiveness of debt proportional to their principal debt forgiveness as of the time they exit TAP.

TAP customers will soon be able to take advantage of enhanced debt forgiveness that will reduce their previous debt on a monthly basis, instead of only receiving forgiveness at the end of 24 full payments as is the current process. This is known as Ratable Forgiveness, which is the monthly proration of debt forgiveness. When this new policy is implemented, each month a TAP participant makes a complete payment, 1/24th of their pre-TAP debt will be immediately forgiven and the payment count will vest. The vested amount is retained even if a participant leaves TAP and later returns to the program. The Philadelphia Water Department Regulations are in the process of being amended to enact this change in policy, which is expected to take effect on July 1, 2022.

2.2 2021 HIGHLIGHTS

Implemented Changes

In March of 2020, PWD and WRB placed a moratorium on all water shut offs and restored service to customers who had previously been shutoff in response to the extraordinary stresses imposed on its customer base during the COVID-19 pandemic. This moratorium continued through September of 2021 for commercial customers. Residential water shutoffs are currently scheduled to resume in July of 2022. In preparation of resuming enforcement measures, TAP Debt Protection was implemented. This is a program designed to provide a way for customers to continue their water service without being immediately responsible for previously incurred debt. TAP Debt Protection works by placing previously incurred debt into a debt collection record. Consequently, that debt was cordoned off and can be paid down over time.

PWD and WRB also enacted an effort in early 2021 that encouraged customers to submit an application and documents to explore the possibility of receiving a lower water bill due to changed financial circumstances.

The TAP recertification process, required by the Philadelphia Water Department Regulations, prompts customers to submit an updated application with their most recent income, household and residency information to verify ongoing eligibility for the program. Because customers who fail to recertify are removed from TAP and are immediately responsible for any outstanding debt on their account, PWD and WRB agreed to pause the recertification process in light of the impacts of COVID-19 during 2020. The recertification process resumed in September 2021. When the process resumed, the City increased the customer's window to return their applications before they would face removal from TAP. Another effort to help customers bring their accounts current included providing more flexible terms for payment agreements. WRB extended payment agreements for up to five years and continued the practice of providing income-based payment agreements up to 15 years.

An additional form of assistance provided to customers was through the grants provided by the Philadelphia Housing Development Corporation (PHDC). PHDC provided funding of up to \$2,000 to PWD customers with overdue bills. PWD and WRB facilitated this process by dedicating resources and developing new technology tools to gather customer account information required to determine debt amounts and overall eligibility for this funding. The Utility Emergency Services Fund (UESF) also provided funding to help with water bill debt. UESF's Utility Grant program works to help customers pay the debt on their delinquent accounts. Eligible PWD customers were able to take advance of this funding in 2021. WRB and PWD developed an enhanced process during 2021 to facilitate the distribution of this grant money to customers more quickly.

Forthcoming Changes

The City is also coordinating with the Commonwealth of Pennsylvania so that customers may access funds from the Low Income Household Water Assistance Program (LIHWAP). LIHWAP is a federal program that provides funds to assist low-income households with grants to pay water and wastewater bills. This work is ongoing, and the disbursement of the grants began in early 2022 and is continuing.

An updated customer assistance application checklist is expected to go live in 2022. One of the most frequent reasons that customers are not accepted into TAP is that the customer's application is missing required information and documentation. A revised checklist will provide clarity to the customer assistance application process and details about documentation required to fully complete the application. The aim of this effort is to decrease the number of incomplete applications.

In February 2022, the City filed amendments to Sections 206.1 and 206.7 in order to implement Ratable Forgiveness for TAP customers. Ratable Forgiveness reduces customers' previously accrued water debt each time a full bill payment is made, instead of in one lump sum at the end of 24 months. This new practice is expected to take effect on July 1, 2022.

Between January 1 and December 31, 2021, the City had fully processed over 12,000 applications and had enrolled 4,971 customers in TAP. As of December 2021, there were 17,148 active TAP participants.

3. CUSTOMER OUTREACH AND SUPPORT

In 2021 PWD and WRB increased their efforts in awareness and outreach for the Customer Assistance Program (CAP).

2021 Focus Group: PWD invested in a focus group to identify customer experiences and perceptions around water assistance. Research findings showed:

- 1) **Debt Forgiveness is a strong incentive for applications.** Participants were most encouraged to apply for help by messages referencing the newly expanded Debt Forgiveness benefit of the Tiered Assistance Program.
- 2) **The majority of focus group participants had experienced significant special hardships over the past 12 months.** About 70% of focus group participants indicated that they experienced one of several recent hardships. The most frequent hardship for participants (8 of 26) was experiencing a loss of job lasting over four months.
- 3) **Participants reported an extensive and confusing application process. *Many respondents felt that the application process was long and required a lot of work to complete.***

The focus group findings drove the approach, ensuring our communications were rooted in evidence and reflected customer perspectives.

Overview:

Outreach content was guided by research. The majority of outgoing communications promoted **Debt Forgiveness, eligibility via special hardship, one-time grants offered by partners, and ways to get help with the application form.**

Media and Ad buys: PWD significantly increased advertising efforts in radio, online, and newspapers, including historically Black newspapers such as the *Philadelphia Tribune* and *Sunday Sun*, along with radio station *WURD*. We maintained strong efforts in Spanish language outreach. We bought advertising and placed interviews on tv, radio and newspapers including *La Mega*, *Telemundo*, and *Al Dia*. This year also saw our most significant investment in transit advertising with SEPTA since the program launched in 2017.

Owned media: PWD grew its reach in 2021. Promotions drove traffic to an actively updated assistance landing page. Upon arrival, visitors were invited to sign up for email updates. Our list of subscribers interested in customer assistance grew by more than 2400, up to 4,265 by the end of the year. Subscribers received monthly bulletins with application tips and other updates to assistance programs. Other forms of outreach included robocalls to recertifying customers, letters, blogs and social media.

Outreach in communities:

- In recognition of Philadelphia’s digital divide, **PWD placed hard-copy flyers at strategic locations** like community fridges and vaccination sites. We translated our outreach flyers into 8 languages, including newly requested languages like Haitian Creole.
- **PWD and WRB joined public meetings, and in-person tabling events** across various communities in the City, with an increased focus on Black and Brown communities. From June to December 2021, representatives shared assistance information at **over 50 community events**.
- **We offered more help with the application form.** At Water Assistance Days and Utility Fairs, reps were made available to help guide customers through their application and gather the documents they needed for applications.

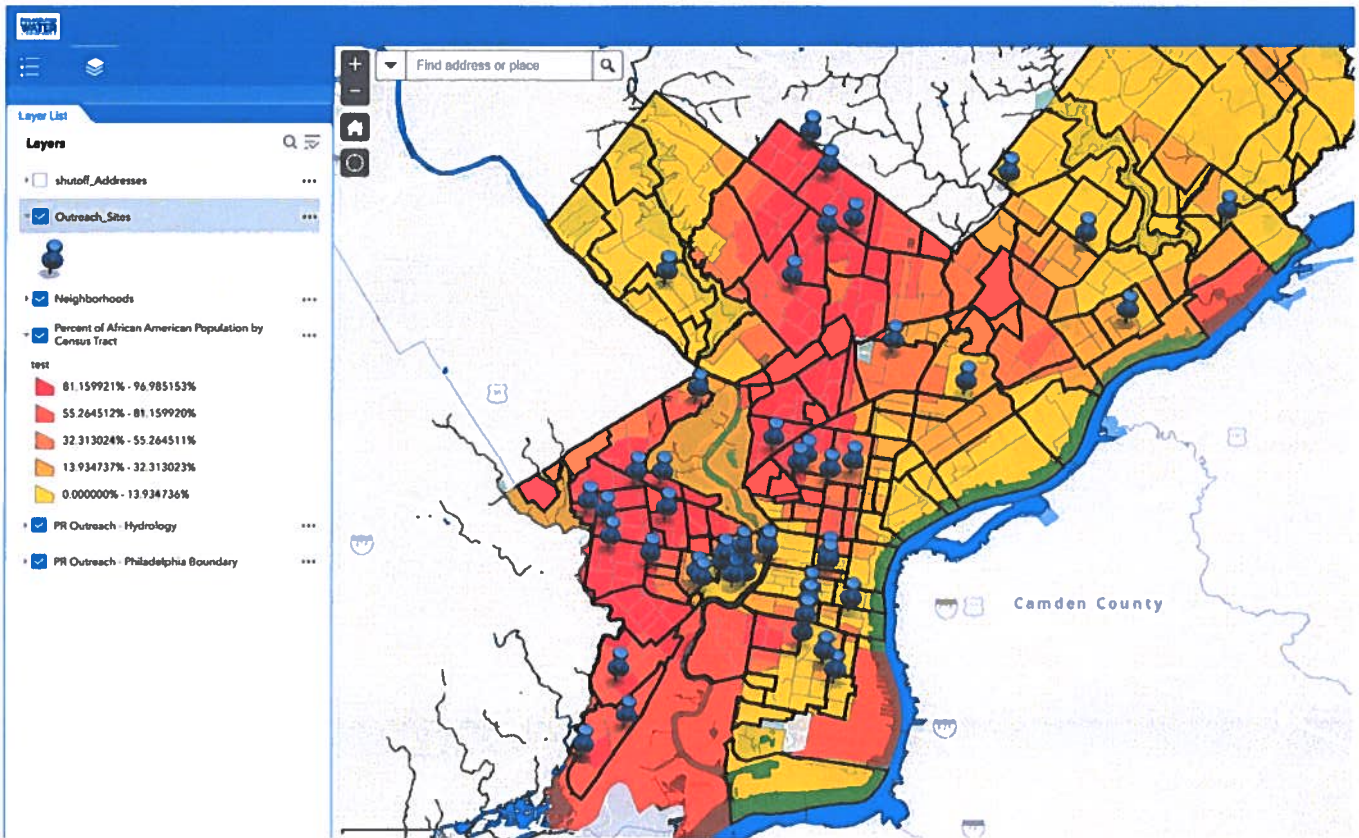
Improving Access

To improve language access for customers, we’re updating the application website landing page content to Chinese (traditional and simplified). PWD and WRB also implemented new bill printing options that included large print and Braille.

Customers reported that several letters with application status information were difficult to understand. In response, PWD started an internal project to review all CAP-related letters. We’re revising the text and format to simplify messages according to Plain Language best practices. This effort began in late 2021 and is expected to continue through 2022 as each letter will be individually reviewed and reworked by key members of WRB and PWD staff.

New Ways of Analyzing Data

The recent rates settlement required the team to evaluate outreach to Black communities. PWD created an interactive mapping tool to see how ongoing outreach efforts overlap with census data. Tools like this allow us to identify any gaps in outreach, and plan future efforts.



Above: In-progress: Interactive Census Map showing the location of advertising, tabling, and flyers.
 Areas with a higher percentages of Black populations, according to census data, are shown in red. The outreach sites are shown as pins on the map and are constantly updated.

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, 2021, the City enrolled **5,211 customers in TAP**. This number is slightly higher than 2020, but still lower than previous years owing to the reduction in application activity. The enrollees had **approximately \$11.1M 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 3. New Applicants Enrolled in TAP in 2021

Income Level as Compared to Federal Poverty Guideline	Total Enrollees	Total Pre-TAP Debt^{1,2}
Up to 50%	870	\$1,962,841.28
Above 50% and up to 100%	2,752	\$5,542,747.82
Above 100% and up to 150%	1,490	\$3,302,726.92
Above 150% and up to 250%	82	\$283,747.54
Above 250%	17	\$57,072.29
Total	5,211	\$11,149,135.85

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 4. Total Debt of Applicants Enrolled in TAP in 2021

Debt Range	Total Enrollees	Total Pre-TAP Debt^{1,2}
< \$0	178	\$(16,608.34)
\$0-\$200	1,738	\$89,176.89
\$200-\$500	555	\$190,813.54
\$500-\$1,000	564	\$409,785.80
\$1,000-\$2,000	611	\$896,210.62
\$2,000-\$5,000	840	\$2,778,893.26
\$5,000-\$10,000	504	\$3,494,949.63
\$10,000-\$20,000	201	\$2,722,501.94
\$20,000-\$50,000	19	\$505,047.73
\$50,000+	1	\$61,756.44
Total³	5,211	\$11,132,527.51

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 5,211 applicants enrolled in TAP (see Table 2, above) during 2021, 7,556 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 5. Applicants Not Enrolled in TAP

Outcome	Count
Denied	
Failed to meet Income and Residency Guidelines	6
Failed to meet Income Guidelines (no Special Hardship)	174
Failed to meet Residency Guidelines	375
Installation Type Not Eligible for TAP	28
Missing or Invalid Income or Residency Documentation	5,998
Missing information on application form	170
Failed to prove Special Hardship	1
Total Denials	6,752
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill ⁴	68
Senior Citizen Discounted Bill + Extended Payment Agreement	264
Regular Bill ⁵	265
Regular Bill + Extended Payment Agreement	164
WRBCC Agreement	26
Total More Affordable Alternative Placements	787
Other Outcomes	
Customer Withdrew Application	0
Data Transfer ⁶	17
Duplicated Application	0
Total Other Outcomes	17
Total Applicants Not Enrolled in TAP	7,556

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

⁵ Regular Bill may also include a standard payment agreement. Standard agreements are reported in Section 4.3, 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, 2021, there were 2,589 active payment agreements between residential water customers and WRB. Of these agreements, 1,779 (69%) were created in 2021, while 810 (31%) were created in previous years and were still ongoing as of the end of 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 to catch up on missed TAP payments. This number is lower due to implementing the TAP Debt Shield, which cancelled many TAP Payment agreements.
- 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 1,779 active residential agreements created in 2021 were made up of 1,177 First Standard Agreements, 381 Second Standard Agreements, 29 Water Revenue Bureau Conference Committee (WRBCC) Agreements, 191 Extended Payment Agreements, and 1 TAP Payment Agreement. Active residential agreements created in 2021 cover just over \$3.3M in principal debt, \$300,000 in penalties and \$80,000 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, 2021 by term range along with the principal, penalties, and other fees covered under the agreements. Table 5 shows information for agreements created in 2021; Table 6 shows agreements created before 2021; and Table 7 shows all agreements (the sum of agreements shown in Table 5 and Table 6).

As of December 31, 2021, there were 25,738 customers in the Senior Citizen Discount (SCD) program, some of whom were in the program prior to the unified customer assistance application process that was introduced with the launch of TAP in 2017.

Table 6. Active (as of 12/31/21) Residential Agreements Created in Calendar Year 2021

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	286	\$175,341.13	\$8,051.89	\$2,146.66
13–24 Months	711	\$921,317.84	\$25,196.93	\$14,189.45
25–36 Months	74	\$205,451.53	\$17,540.97	\$6,681.22
37–48 Months	33	\$129,782.19	\$20,787.22	\$5,005.84
49–60 Months	73	\$429,856.16	\$75,510.90	\$12,826.40
Total First Standard Agreements	1,177	\$1,861,748.85	\$147,087.91	\$40,849.57
Second Standard Agreements				
0–12 Months	63	\$52,922.12	\$1,340.99	\$999.77
13–24 Months	163	\$214,343.49	\$9,880.66	\$5,047.91
25–36 Months	79	\$172,728.12	\$15,912.75	\$5,505.17
37–48 Months	27	\$68,841.73	\$16,391.43	\$2,953.35
49–60 Months	49	\$308,588.33	\$50,150.67	\$9,414.28
Total Second Standard Agreements	381	\$817,423.79	\$93,676.50	\$23,920.48
WRBCC Agreements⁷				
0–12 Months	29	\$90,706.59	\$8,458.80	\$166.00
Total WRBCC Agreements	29	\$90,706.59	\$8,458.80	\$166.00
Extended Payment Agreements				
13–24 Months	31	\$31,854.42	\$1,385.24	\$1,157.40
25–36 Months	18	\$24,598.61	\$932.63	\$903.05
37–48 Months	20	\$27,330.97	\$652.53	\$840.15
49–60 Months	4	\$5,877.54	\$112.02	\$212.90
>60 Months	118	\$489,425.56	\$50,578.49	\$13,354.00
Total Extended Payment Agreements	191	\$579,087.10	\$53,660.91	\$16,467.50
TAP Payment Agreements				
0–12 Months	1	\$79.32	\$-	\$-
Total TAP Payment Agreements	1	\$79.32	\$-	\$-
Total of all Agreements	1,779	\$3,349,045.65	\$302,884.12	\$81,403.55

⁷ In response to COVID-19, some WRBCC agreements were created through administrative extensions for WRBCC customers instead of the regular application process in order to prevent the possibility of customers breaching their agreement.

Table 7. Active (as of 12/31/21) Residential Agreements Created Before 2021

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	1	\$1,154.23	\$-	\$-
13–24 Months	64	\$85,926.92	\$3,931.16	\$1,217.40
25–36 Months	54	\$115,972.43	\$12,196.46	\$3,202.05
37–48 Months	38	\$127,388.79	\$16,327.15	\$4,233.55
49–60 Months	91	\$562,117.39	\$127,107.50	\$11,396.84
>60 Months	2	\$7,343.02	\$4,836.84	\$150.00
Total First Standard Agreements	250	\$899,902.78	\$164,399.11	\$20,199.84
Second Standard Agreements				
13–24 Months	7	\$9,921.62	\$910.75	\$294.35
25–36 Months	46	\$87,601.50	\$13,054.75	\$2,296.90
37–48 Months	37	\$109,810.58	\$24,905.27	\$2,913.35
49–60 Months	71	\$393,069.23	\$60,901.87	\$6,805.40
Total Second Standard Agreements	161	\$600,402.93	\$99,772.64	\$12,310.00
Ten/Five Agreements				
49–60 Months	10	\$56,111.38	\$11,313.64	\$450.00
>60 Months	2	\$8,857.71	\$1,606.23	\$10.00
Total Ten/Five Agreements	12	\$64,969.09	\$12,919.87	\$460.00
WRBCC Agreements⁸				
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	4	\$5,100.41	\$219.25	\$182.90
25–36 Months	17	\$27,547.11	\$2,696.10	\$821.60
37–48 Months	28	\$51,787.53	\$5,086.68	\$1,061.30
49–60 Months	32	\$68,064.57	\$7,597.24	\$1,364.50
>60 Months	306	\$1,538,002.76	\$235,181.05	\$25,099.19
Total Extended Payment Agreements	387	\$1,690,502.38	\$250,780.32	\$28,529.49
TAP Payment Agreements				
0–12 Months	0	\$-	\$-	\$-
Total TAP Payment Agreements	0	\$-	\$-	\$-
Total of all Agreements	810	\$3,255,777.18	\$527,871.94	\$61,499.33

⁸ Some of the WRBCC agreements reflect administrative extensions that changed the duration of the agreement, but not the start date.

Table 8. Summary of All Active (as of 12/31/21) Residential Agreements

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	287	\$176,495.36	\$8,051.89	\$2,146.66
13–24 Months	775	\$1,007,244.76	\$29,128.09	\$15,406.85
25–36 Months	128	\$321,423.96	\$29,737.43	\$9,883.27
37–48 Months	71	\$257,170.98	\$37,114.37	\$9,239.39
49–60 Months	164	\$991,973.55	\$202,618.40	\$24,223.24
>60 Months	2	\$7,343.02	\$4,836.84	\$150.00
Total First Standard Agreements	1,427	\$2,761,651.63	\$311,487.02	\$61,049.41
Second Standard Agreements				
0–12 Months	63	\$52,922.12	\$1,340.99	\$999.77
13–24 Months	170	\$224,265.11	\$10,791.41	\$5,342.26
25–36 Months	125	\$260,329.62	\$28,967.50	\$7,802.07
37–48 Months	64	\$178,652.31	\$41,296.70	\$5,866.70
49–60 Months	120	\$701,657.56	\$111,052.54	\$16,219.68
Total Second Standard Agreements	542	\$1,417,826.72	\$193,449.14	\$36,230.48
Ten/Five Agreements				
49–60 Months	10	\$56,111.38	\$11,313.64	\$450.00
>60 Months	2	\$8,857.71	\$1,606.23	\$10.00
Total Ten/Five Agreements	12	\$64,969.09	\$12,919.87	\$460.00
WRBCC Agreements				
0–12 Months	29	\$90,706.59	\$8,458.80	\$166.00
Total WRBCC Agreements	29	\$90,706.59	\$8,458.80	\$166.00
Extended Payment Agreements				
13–24 Months	35	\$36,954.83	\$1,604.49	\$1,340.30
25–36 Months	35	\$52,145.72	\$3,628.73	\$1,724.65
37–48 Months	48	\$79,118.50	\$5,739.21	\$1,901.45
49–60 Months	36	\$73,942.11	\$7,709.26	\$1,577.40
>60 Months	424	\$2,027,428.32	\$285,759.54	\$38,453.19
Total Extended Payment Agreements	578	\$2,269,589.48	\$304,441.23	\$44,996.99
TAP Payment Agreements				
0–12 Months	1	\$79.32	\$-	\$-
Total TAP Payment Agreements	1	\$79.32	\$-	\$-
Total of all Agreements	2,589	\$6,604,822.83	\$830,756.06	\$142,902.88

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 2021, there were 676 cases of TAP participants defaulting from TAP, all for failure to successfully recertify. Of those, 433 did not respond to the recertification request in a timely manner, 209 were denied, and 34 were enrolled in an alternate program. 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 9. Customers Defaulting from TAP

Outcome	Count
Did Not Respond	433
Denied	
Failed to meet Income and Residency Guidelines	0
Failed to meet Income Guidelines (no Special Hardship)	11
Failed to meet Residency Guidelines	9
Installation Type Not Eligible for TAP	0
Missing or Invalid Income or Residency Documentation	186
Missing information on application form	2
Data Transfer	1
Total Denials	209
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill	5
Senior Citizen Discounted Bill + Extended Payment Agreement	5
Regular Bill	14
Regular Bill + Extended Payment Agreement	10
Total More Affordable Alternative Placements	34
Total Customers Defaulting from TAP	676

5. CONCLUSION

During 2021 the City continued to successfully operate an effective and supportive customer assistance program. This past calendar year the primary focus was enhancing the program to better serve customers while minimizing any negative impacts due to debt incurred during COVID-19.

During 2021, WRB **enrolled 5,211 customers in TAP. As of December 2021, there were 17,148 active TAP participants.** Some of these customers are beginning their fourth year of TAP participation. Ongoing efforts to improve established processes and communications have helped allow the program to operate more smoothly and adapt to constantly changing circumstances of the year.