



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

Department of Revenue

Calendar Year 2023

November 8, 2024



City of
Philadelphia



November 8, 2024

The Honorable Cherelle Parker
Mayor, City of Philadelphia
City Hall, Room 215
Philadelphia, PA 19107

Dear Mayor Parker:

Enclosed is the Department of Revenue's eighth annual Report to the Mayor on the Tiered Assistance Program (TAP). The report, required under Philadelphia Code Section 19-1605(7), provides program metrics for calendar year 2023.

During 2023, the Water Revenue Bureau and Water Department began auto-enrolling customers that had been pre-qualified for TAP, based on their participation in other customer assistance programs - starting with the federal Low-Income Household Water Assistance Program.

The Departments also made policy changes to the application process to make applying easier for customers and keep customers enrolled in TAP, with concerted effort to communicate with customers every step of the way, from application to enrollment completion. As a result, TAP enrollment reached an all-time high of 21,694 at the end of 2023.

The Water Revenue Bureau and Water Department worked with partners to identify and reach the most vulnerable members of our communities to communicate the protections available to them under the program. The Water Revenue Bureau and Water Department staff attended more than 300 community events in 2023 to talk to individual customers about getting help with their water bills; the City advertised assistance grants on the radio; and improved the TAP application website to make applying easier. Over the past year, the TAP team has worked diligently to continue its efforts to provide meaningful assistance to the water customers of Philadelphia, and we look forward to providing the same level of service in 2024.

Sincerely,

Kathleen McColgan
Revenue Commissioner and Chief Collections Officer

Enclosure

CC: Kenyatta Johnson, City Council President
Liz McCollum-Nazario, Interim Chief Clerk of the City Council

TABLE OF CONTENTS

1.	EXECUTIVE SUMMARY	1
1.1	BY THE NUMBERS	1
2.	INTRODUCTION	4
2.1	TIERED ASSISTANCE PROGRAM	5
2.2	2023 HIGHLIGHTS	7
3.	CUSTOMER OUTREACH AND SUPPORT	10
4.	REPORTING METRICS	16
4.1	APPLICANTS ENROLLED IN TAP	16
4.2	APPLICANTS NOT ENROLLED IN TAP	18
4.3	NON-TAP PAYMENT AGREEMENTS	19
4.4	CUSTOMERS DEFAULTING FROM TAP	23
5.	CONCLUSION	24

1. EXECUTIVE SUMMARY

As of December 2023, the City of Philadelphia has administered the Tiered Assistance Program (TAP) for over six years. The program was designed to assist 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 (Rate Board). TAP provides for participating customers' bills to be capped at between 2% and 4% of monthly household income, based on household income with respect to the 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 eighth such report and covers the calendar year 2023. During this year, the City extended the recertification period and began auto-enrolling customers that were prequalified for TAP based on their participation in the federal Low-Income Household Water Assistance Program (LIHWAP).

The City made significant changes to the TAP application in 2023: reduced the number of documents required to apply, made improvements to the website to make it easier to navigate. 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.

1.1 BY THE NUMBERS

Philadelphia Code section 19-1605(7)(b)(1-4) specifies four types of metrics that the Department should report each year: Applicants Enrolled in TAP, Applicants Not Enrolled in TAP, Non-TAP Payment Agreements, and Customers Defaulting from TAP. While the Code refers to these metrics as "Applicants" it should be noted that the terms reflect the number of applications, rather than the number of customers, as customers can make multiple applications.

- **During 2023, the WRB processed 12,415 applications and enrolled 8,413 customers in TAP.** Of these, 2,770 customers were auto enrolled as part of a pre-qualification pilot with the Commonwealth's LIHWAP program. See Figure 1 for 2023 TAP Enrollees by Federal Poverty Guideline percentage.
- **In December 2023, there were 21,694 active TAP participants.**
- Customers enrolling in TAP during 2023 had approximately \$14.6M in water account arrears at the time of enrollment.
- 4,002 applications resulted in:
 - Customers getting placed in a program other than TAP because it was determined to be more affordable
 - Having their applications denied because they failed to meet income or residency requirements or submitted incomplete applications (see Figure 2).
- When TAP participants' bills are capped at a percentage of their income, their savings are recorded as a discount on their regular bills. In 2023, TAP participants received \$12,047,757.81 in TAP discounts. As reported in the Monthly/Quarterly Reports to the Rate Board, TAP participants received \$350,348.17 in penalty arrearage forgiveness, and \$7,553,743.33 in principal arrearage forgiveness. Discounts and arrearage forgiveness amounts are not required reporting metrics, but

they help provide a more detailed picture of TAP. The costs of TAP discounts are recovered through the TAP rate reconciliation, while the cost of arrearage forgiveness is not recovered currently.

- **As of December 31, 2023, there were 26,218 customers in the Senior Citizen Discount (SCD) program.** Some customers categorized as Senior Citizens are also enrolled in TAP and have bills capped based on income.
- In addition to TAP, this document also reports non-TAP Payment Agreements, which are defined as payment agreements outside of the TAP program. **As of December 31, 2023, there were 3,200 active residential payment agreements** covering roughly \$7.7M in principal debt and \$1.0M in penalties and other fees under an agreement. See Figure 3 below for a breakdown of all agreements by type.

Figure 1. Count of 2023 TAP Enrollees by Federal Poverty Guideline Percentage (total: 8,413)

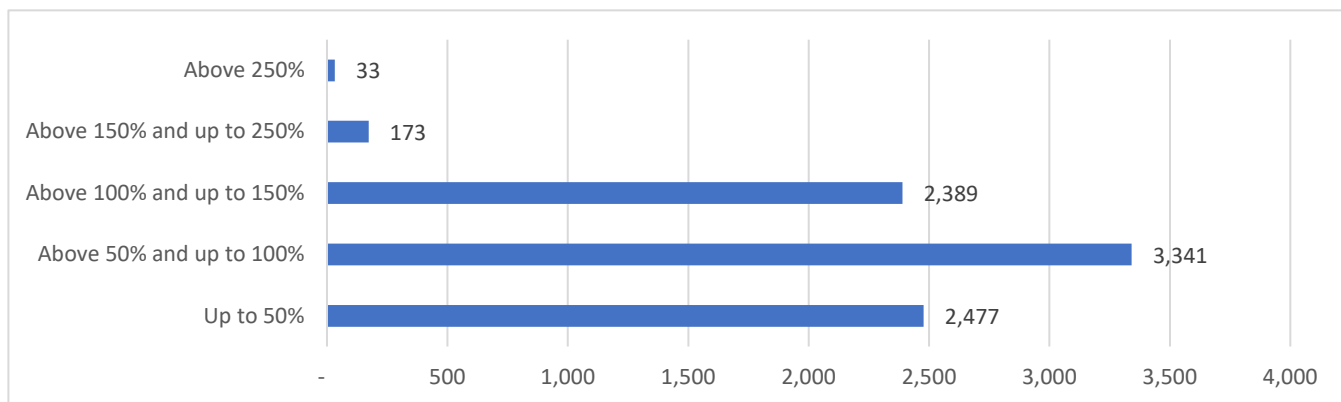


Figure 2. 2023 Customer Assistance Application Outcomes (total: 12,415)

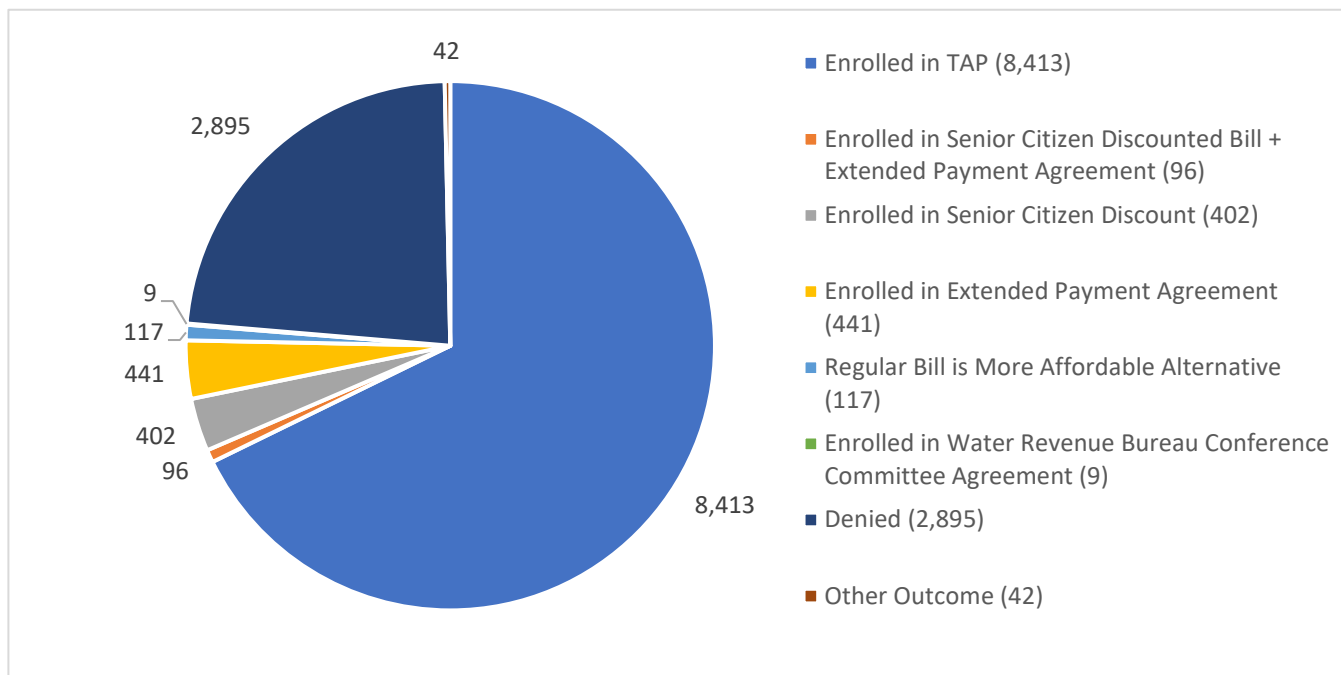
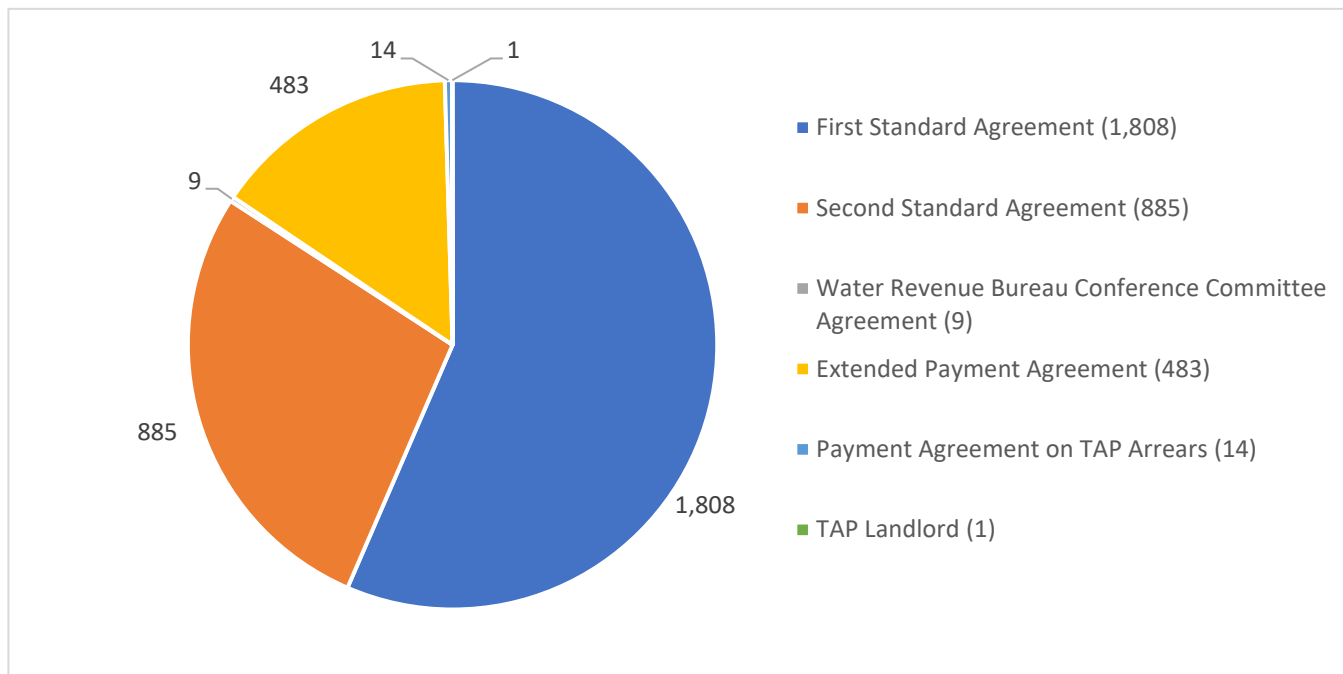


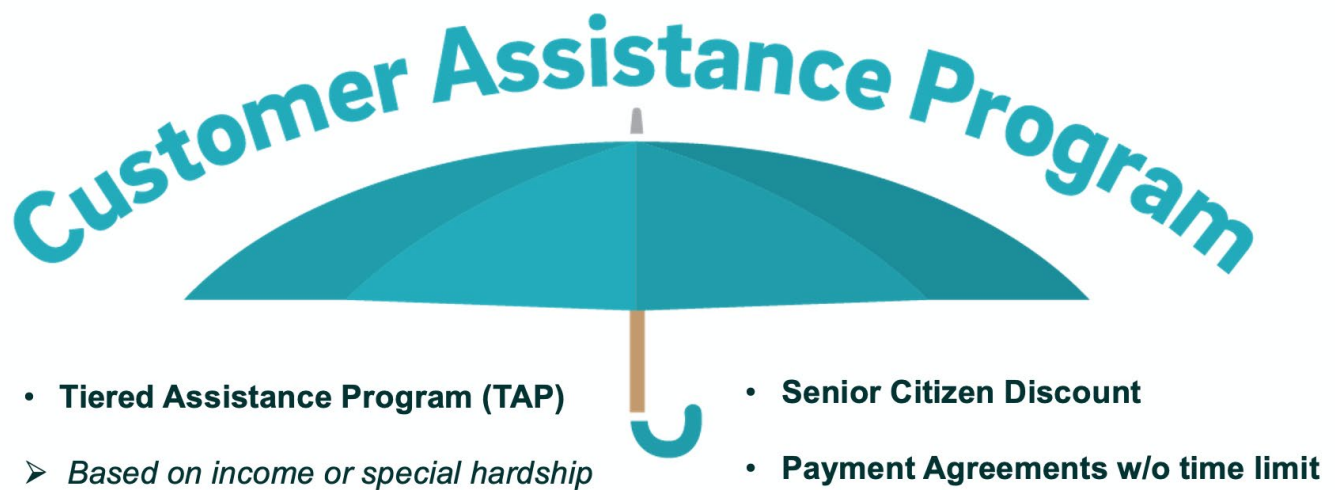
Figure 3. Non-TAP Residential Payment Agreements Active as of 12/31/23 (total: 3,200)¹



¹ Customers with arrearages on their TAP bills can enter payment agreements to pay those arrearages. Those payment agreements are reflected as “Payment Agreement on TAP Arrears”

2. INTRODUCTION

In 2017, the City of Philadelphia successfully launched TAP 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. At the same time, application and enrollment in other Customer Assistance Programs offered by the Water Revenue Bureau (WRB) were streamlined into the same process. The graphic below has been used by PWD to describe the programs that fall under the Customer Assistance umbrella, all of which can be accessed through the same application process.



TAP was a result of two essential drivers: The first is Philadelphia Code section 19-1605, enacted in 2015, which laid the groundwork for program policies and requirements. The second is the Rate Board’s rate determinations in 2016, 2018, 2021, and 2023, which outlined expectations and goals for enrollment and upheld the program year after year.

The ordinance requires the Department of Revenue to submit by March 31 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

Customers approved for TAP receive an individualized bill that is tied to a percentage of their income. Bills are capped at between 2% and 4% of monthly household income, based on household income with respect to the current Federal Poverty Guidelines, as shown in Table 1. The Federal Poverty Guidelines based on household size for calendar year 2023 are shown in Table 2 below.

Table 1. TAP Bill Caps

Household Income to Federal Poverty Level Percentage	Bill as percentage of Household Income
Below 50%	2.0%
Above 50% and at or below 100%	2.5%
Above 100% and at or below 150%	3.0%
Above 150% (Special Hardship)	4.0%

Table 2. Federal Poverty Guidelines for 2023

Household Size	Gross Monthly Income
1 Person	\$1,215.00 per month
2 People	\$1,643.33 per month
3 People	\$2,071.67 per month
4 People	\$2,500.00 per month
5 People	\$2,928.33 per month
6 People	\$3,356.67 per month
7 People	\$3,785.00 per month
8 People	\$4,213.33 per month
<i>For each additional person:</i>	Add \$428.00 to the amount above

Program eligibility by way of special hardship, for customers with income over 150% of the Federal Poverty Guidelines, 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 assistance. If customers do have back debt on their water accounts, that debt is protected. This means that no enforcement action will be taken on that debt while the customer is enrolled in TAP.

Once enrolled in TAP, any current water, sewer, or stormwater charges above a customer's fixed amount are discounted². Customers can also benefit from penalty and principal forgiveness for past (pre-TAP) debt.

TAP participants receive forgiveness of penalty charges after 24 full payments of their TAP bills. Principal forgiveness occurs through the "ratable forgiveness" process by which TAP participants can have 1/24th of their unpaid, pre-TAP principal debt forgiven with each TAP bill payment.³

While penalty forgiveness was available when TAP launched in July of 2017, principal forgiveness and ratable principal forgiveness is relatively new. PWD and WRB implemented ratable forgiveness by jointly filing an Amendment to Philadelphia Water Department Regulations Section 206.7 and the corresponding definitions in Section 206.1. The initial filing was made on February 8, 2022, and the City filed the final version of the amendments on May 31, 2022, after receiving written comments and conducting a public hearing.

² Per PWD regulations, customers who are removed from TAP for intentionally false enrollment or re-certification will be back-billed for the difference between their TAP bill and the general rate for months they participated in the program.

³ This process went into effect in June 2022 with the implementation of ratable forgiveness. At that time, customers received lump sum principal forgiveness to reflect the number of full TAP bill payments they had already made since September 1, 2020. Since then, forgiveness has occurred monthly as described.

2.2 2023 HIGHLIGHTS

At the end of 2023, TAP participation had reached its highest point, at 21,694 active TAP participants, which was the result of the highlights below.

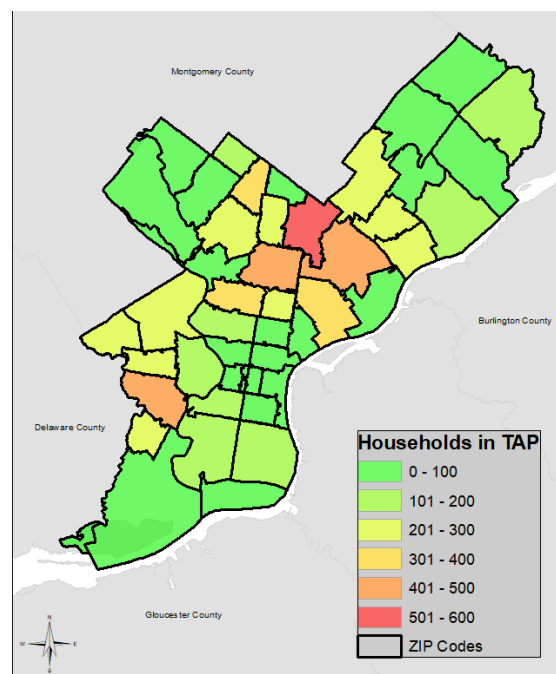
Distribution of Participants

TAP Participants come from all over Philadelphia, living in all but six of the city’s 49 ZIP codes. However, ZIP codes that had the most TAP participants and enrollees in 2023 also overlap with Census blocks/tracts that had large numbers of residents who have experienced poverty in the past year.⁴ The program is making progress towards its goal of protecting the city’s most vulnerable residents.

Pre-qualification of LIHWAP Grant Recipients

In 2023, TAP introduced one of its most significant additions since 2017: auto enrolling pre-qualified customers. For the pilot round of pre-qualification, PWD and WRB partnered with the Pennsylvania Department of Health and Human Services (DHS), which administered the Commonwealth’s Low-Income Household Water Assistance Program (LIHWAP). LIHWAP provided low-income customers with one-time grants to pay off existing water and wastewater debt, and customers who qualified to receive LIHWAP funds were highly likely to meet the income requirements needed to qualify for TAP, as well.

Figure 4 TAP Participation by Philadelphia ZIP code



Once data was provided by DHS in March 2023, and WRB’s software application for managing and tracking customer assistance enrollment was updated to process prequalified records from DHS, WRB staff started the process of auto enrolling pre-qualified LIHWAP grant recipients in May 2023. **By the end of December, WRB had auto enrolled over 2,750 pre-qualified customers.** The Commonwealth re-opened LIHWAP applications in August 2023, and as a result, additional customers were pre-qualified for TAP. WRB received information about these additional LIHWAP grant recipients in December 2023. Those customers’ records were reviewed, and they were auto enrolled during 2024.

During 2023, of the approximately 8,000 potential customers in the LIHWAP dataset, around 1,900, or 24%, were already TAP participants. Customers who could be re-enrolled were, at the same or a lower TAP rate.

Pre-qualification of Customers using City Administrative Data

Outside of pre-qualification of LIHWAP grant recipients, WRB also began working with the City’s Office of Integrated Data for Evidence and Action (IDEA) to identify and pre-qualify customers using administrative data.

⁴ As measured in the 2022 American Community Survey 5-Year Estimate “S1702, Poverty Status in the Past 12 Months of Families”

The partnership began in late 2023, and enrollment of this set of pre-qualified customers began in February 2024.

Application Change

While WRB and PWD are enrolling as many customers as possible through pre-qualified auto enrollment, the Departments took several significant steps in 2023 to make the application requirements clearer and easier to complete successfully. They also updated program policies to keep customers in the program.

Historically, the most common reason that “traditional” applicants (that is, those that are not pre-qualified) are not enrolled in TAP is that their applications have missing or invalid income or residency documentation. Since the beginning of the program, applicants had to submit two acceptable proof of residency documents (such as a valid driver's license or utility bill from the last 6 months) in order to be approved for TAP. In 2023, WRB reduced the number of required residency documents to one and allowed all documents to be dated within the last 12 months. This change went into effect on April 1, 2023. While missing or invalid income or residency documentation is still the most common reason that traditional applicants are not enrolled in TAP, the share of applications denied for submitting incomplete residential information went down considerably compared to the same period in 2022 (see Table 3). There are, of course, many factors that affect application rates, and customers who were enrolled or not enrolled in TAP through pre-qualification are counted as the Applicants Enrolled in TAP and Total Applicants Denied for TAP. Nonetheless, the percentage of applicants who were denied for missing or invalid residency documentation decreased dramatically after April 2023. This suggests that reducing the residency documentation requirement had a strong, positive impact.

Table 3. Application Outcomes, April-December 2022 vs April -December 2023

Outcome	Apr-Dec 22 Total	Apr-Dec 23 Total	Apr-Dec 22 Percent	Apr-Dec 23 Percent
Applicants Enrolled in TAP	7,896	7,080	57%	69%
Not Enrolled: Applicants Enrolled in More Affordable Alternative	1,239	832	9%	8%
Not Enrolled: Applicants Denied for TAP	4,604	2,294	34%	22%
<i>Applicants Denied for Missing/Invalid Residency Documentation (subset of Denials)</i>	2,818	736	61%	32%

In prior years, a common reason customers stopped participating in TAP was they failed to re-certify their enrollment. In November 2023, WRB extended the period in between recertifications from three years to four years, resulting in only a handful of customers being requested to recertify during 2023. As noted above, this decision meant that more existing TAP participants stayed in the program in 2023. While fewer customers enrolled in TAP in 2023 than in 2022, fewer customers also left the program, and TAP enrollment reached an all-time high by the end of December 2023.

Program Review

In 2023, WRB and PWD entered into an agreement to begin working with the Service Design Studio (SDS) within the Office of the Chief Administrative Officer to evaluate the administration and application processes for TAP with the goal of making significant changes to how customers interact with the program. Work will continue in 2024, and WRB plans to implement design changes in the future.

As in years past, the software team has enhanced processes in CAMP (Customer Assistance Management Program, the software system for processing assistance applications) to help Customer Assistance Division staff improve quality assurance/control and to help supervisors work more efficiently and accurately.

Customer Letters

When it comes to customer assistance, applications, and reviews, WRB is required by Ordinance to communicate every decision it makes to customers. There are dozens of unique situations that can arise in the process, each with its own required letter. Customers have indicated that these letters can sometimes be confusing. As a result, PWD and WRB launched an internal letter review project in 2021, and the project continued through 2023. By the end of 2023, 5 letters were either in final review or were in production. In 2023, the function of generating letters was moved into CAMP from basis2 to afford WRB greater flexibility in updating letter text to meet evolving requirements or policy changes.

Technology and Training

TAP relies on the CAMP software system for application management, review, and reporting requirements. As periodic updates are made to CAMP, the software support team provides trainings so that Customer Assistance Division and Contact Center staff are up to date on the latest developments. In addition, the CAMP team has been added to the onboarding/training of all new PWD and Revenue employees to communicate the requirements and processes related to participation in TAP and other customer assistance programs.

The City's efforts to upgrade its software infrastructure and servers through all departments in 2023, included the CAMP software support team and these server upgrades will be vital to supporting TAP as it continues to grow. Many more upgrades are set to occur in 2024.

Arrearage Forgiveness

2023 was the first full year when the ratable forgiveness policy for principal arrearages for TAP customers was in effect. Each time TAP participants make a full TAP payment, they have 1/24th of their principal debt (as of the first time they enroll in TAP) forgiven and have all their penalty arrearages forgiven once they have made 24 full payments. PWD and WRB continue to keep a close eye on the application of forgiveness and credits and provide the Rate Board quarterly reports on arrearage forgiveness.⁵ In 2023, TAP participants received \$350,348.17 in penalty forgiveness and received \$7,553,743.33 in principal forgiveness.

⁵ The reports are posted on the Rate Board's website at <https://www.phila.gov/departments/water-sewer-storm-water-rate-board/about/>.

3. CUSTOMER OUTREACH AND SUPPORT

PWD and WRB strive to communicate with customers, listen to their concerns and ideas, and respond by making program changes or new marketing materials to provide the best possible service experience. This includes different ways to connect, through both electronic and print materials, and virtual and in-person events.

Media and Paid Advertising

In 2023, PWD's first quarter media strategy focused on promoting Pennsylvania Housing Assistance Fund (PAHAF) grants. PAHAF provides funds for homeowners to help resolve delinquent utility payments, and customers who receive PAHAF grants may also be eligible for TAP. To promote PAHAF, PWD purchased advertising slots on the radio stations LaMega, WDAS, Rumba 106.1, and WURD, and with the newspaper *Al Dia*. These media buys included digital advertising using email, social media, and ads on streaming platforms. On February 1, 2023, applications to PAHAF were paused, but the program re-opened to new applicants on March 18, 2024. As a result, PWD pivoted to advertising the second round of LIHWAP funding. The LIHWAP application was open for 5 weeks, and the advertisements helped bring in 1,500 applications.

In addition to PAHAF and LIHWAP, PWD Public Affairs and Communications' campaigns focused on two main messages: 1) enrolling customers in TAP to receive shut-off protection after the pandemic-era moratorium was lifted, and 2) reminding existing TAP participants that even in TAP or other assistance programs, bills continue to accrue when they go unpaid.

When possible, the departments focused media and paid advertising to reach the neighborhoods with the highest rates of delinquencies and accounts that qualified for water service shutoff. This was accomplished through zip code-filtered streaming ads and partner advertiser emails. PWD prioritized ad placement with media outlets that serve communities of color. Paid advertising ran in every month of 2023 from February to December.

Owned Media

As with purchased media, 2023 email and social media campaigns owned by PWD focused on PAHAF and the second round of LIHWAP applications. Several different emails were sent to the PWD Customer Assistance mailing list, with details shown below.

In total, 229,542 subscribers received Customer Assistance Program related communications in 2023 over 19 individual bulletins. With an open rate of 47.7%, these bulletins outperformed the industry benchmark of 39%. The 5% click rate for these bulletins outperformed the industry benchmark of 3%. These metrics do not include the ongoing welcome campaign delivered to recipients who sign up for the Customer Assistance email topic.

Users can subscribe to the CAP topic from the water.phila.gov/care page or by updating their existing email subscription to include this topic. Year over year, this topic has grown its subscribers. In 2022, there were 12,516 subscribers compared to 16,436 at the end of 2023. This represents a nearly 25% growth rate. As mentioned, subscribers to this topic receive a series of emails to introduce them to different facets of CAP. This campaign was sent to 4,662 unique recipients in 2023 with an open rate of 57.8% and a click rate of 12.4%. The high open and click rates show that these emails are relevant and timely to the audience.

Use your taxes to make applying easier

Gather what you need >



Now is a great time to apply

Applying for assistance may be overwhelming. However, when you already have your paperwork handy, it can make applying easier and help ensure you get the discounts you're eligible for.

Gather what you need. If you recently completed your taxes, this step might be easier!

- **Water Access Code:** Found on your water bill.
- **Proofs of residency:** A government ID with your address.
- **Proof of income:** Like the summary page of your federal income tax return. You'll need to include proof of income for every adult in your household. If an adult in the household doesn't have income, that will need to be stated.

[View the Full Checklist](#)

The most common reason for a denied application is missing or outdated income documentation.

If the date on your income documentation is over a year old, then use recent paystubs or a benefits awards letter.

EASIER APPLICATION

No scanner?
No problem!

Use your phone to snap a clear picture of any required documentation!

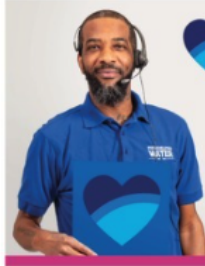


What customers have to say about applying for assistance:

“The application was super easy to apply and they got back to me quickly. I'm very happy I was told about the program...It has helped me out so much.”

[Apply Now](#)

About Us: The Philadelphia Water Department supplies drinking water, wastewater, and stormwater services to customers within the City of Philadelphia. The Department also has one wholesale water contract and 10 wholesale wastewater contracts with entities outside the City. Learn more at water.phila.gov



Welcome!

We're glad you're here and we're here to help!

[Start your application >](#)

We're glad you're here

Thank you for subscribing to our water customer assistance emails! We know that understanding your eligibility and the application can be overwhelming, but we are here to help. We'll provide you with information and resources to help you apply for assistance, lower your water bills, and more.



“What I love about this program is that we have so many ways to help.

You might not realize how many different programs you're considered for with just this *one* application.”

We may be able to **help with lower water bills**. We offer assistance to:

- Low-income customers
- Seniors
- Anyone experiencing a special hardship, making it difficult to pay water bills.

Unsure if you qualify? We decide claims on a case-by-case basis and may still be able to help. Report your specific situation when filling out the application.

To plan your application, use our checklist to gather the necessary documents. You only need to fill out **one form to apply** for all our discounts!

[Review the Checklist](#)

If you have application-related questions, please email watercap@phila.gov, or call (215) 685-6300.

Note: Application materials cannot be submitted over email.

Photo: Sahar Coston-Hardy © PWD

The Philadelphia Water Department supplies drinking water, wastewater, and stormwater services to customers within the City of Philadelphia. The Department also has one wholesale water contract and 10 wholesale wastewater contracts with entities outside the City. Learn more at water.phila.gov.

PWD and WRB started a major re-evaluation of the TAP program and application with the SDS, and in 2023 defined the scope of the project. In 2024, the SDS will review each part of the program and the application, using data to track places in the application where customers are most likely to get stuck or even stop applying, as well as testing changes to the application and program. Before its creation, much of the TAP application was designed to combat fraud and abuse, but now, the focus must be on making it more accessible.

PWD continued to make improvements to the CAP website, making language about TAP clearer and making it much easier to navigate the program. The new resources can be viewed at <https://water.phila.gov/cap/tap/> Also, PWD developed a web-based eligibility calculator so that customers can easily tell if they qualify for TAP and know what documentation they will need. This will launch in 2024 pending final usability testing.

Pre-qualification/auto-enrollment will have a significant, positive impact on TAP participation by offering benefits of TAP, such as fixed, affordable monthly bill and debt forgiveness, to a larger group of Philadelphians with demonstrated need. Because these customers did not apply for the program directly, however, it was especially important for PWD and WRB to clearly communicate to them the benefits of TAP. In 2023, the TAP team created a special welcome letter to let customers know they had been pre-qualified based on their having received other assistance, such as a LIHWAP grant, and were auto-enrolled in the program. This letter also provides a means to opt into data sharing to ease enrollment into other City assistance programs and presents the option to opt out of participating in the program if the customer desires. PWD has set up a hotline for customers choosing to opt out, but only 9 customers chose to take advantage of this option in 2023. Lastly, PWD and WRB Communications teams created a TAP welcome page for customers wanting to know more about the benefits of TAP and expectations from program participants, such as periodic recertification.

Outreach in Communities

In 2023, PWD continued its partnership with Community Resource Corps (CRC), an organization in the Mayor's Office of Civic Engagement and Volunteer Service, that is dedicated to projects that help mitigate poverty, and its partnership with the Philly Counts team, which coordinates community engagement efforts with other partners to assist water customers with CAP applications. Both partnerships started in 2022, and both aimed to make direct interactions with customers in a very targeted way.

CRC reached out to specific customers in danger of water shut-off with direct text messages, phone calls, and door-to-door canvassing. In May of 2023, PWD and WRB's shut-off policy changed, so that any household with a child under 18, a senior 65 years or older, and/or person with a disability could avoid having their water shut off. In response, PWD, WRB and CRC launched the "Raise Your Hand" campaign, which allows customers to let PWD and WRB know they qualify for protection, and CRC focused on combing City data to identify and contact customers that were protected from shut-off.

PWD also issued its 2023 Annual Customer Survey, which included a whole section on paying bills and the bill payment process. In the survey, customers reported less familiarity with details surrounding TAP's Debt Forgiveness benefit. The survey also confirmed that some customers are interested in additional information about how their stormwater charges are calculated. PWD and WRB consistently undertake activities to listen to customers, and always allow for formalized customer feedback. These important responses will help drive upcoming guidance and communications around billing and customer support.

As in past years, PWD partnered with CMC Energy Services (CMC) in 2023 to provide water audits and inspections to low-income households and provide them with free water-saving measures. In calendar year 2023, CMC conducted over 2,400 customer visits, installed or performed over 4,250 measures, and helped customers save over 7,650 gallons/year on average.

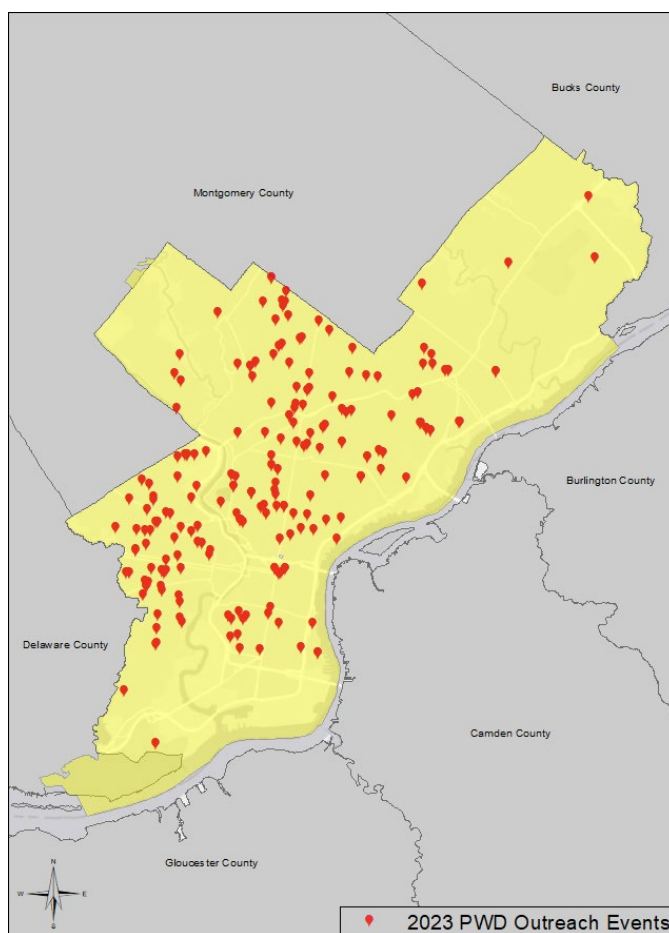
Customer Outreach and Support Events

In 2023 Philadelphians were more confident in attending in-person events as the COVID-19 pandemic wound down. WRB and PWD Communications and Outreach staff attended over 300 events throughout the year. Staff brought both flyers and electronic devices to let customers choose their style of applying since some customers are more comfortable with technology while others prefer paper applications.

PWD Public Affairs staff gave out customer assistance materials or made presentations at over 200 events like Back to School nights, Senior Fairs, neighborhood block parties, and Resource Fairs, and engaged with over 4,300 people. In particular, staff shared information and worked with customers at over 20 utility assistance clinics and utility fairs.

WRB's Outreach team attended hundreds of events where they distributed information about TAP and other water assistance programs. During the busy seasons of spring, summer, and fall, a WRB representative was present at each event along with Public Relations Specialists.

One notable series of events attended by the Outreach team was the twelve events in the Services Series hosted by Councilmember Quetzy Lozada. These events were created to help working-class residents access city services, which can be challenging during regular business hours. In addition, the Outreach team attended eight events in Councilmember Jones's Jazz Series, which were well-attended. Councilmember Phillips also hosted five "Outside Block Meeting" events and Councilmember Gauthier hosted a fourth district Workshop series, which provided one-on-one assistance and guidance to customers.





Senior Fairs were an important part of WRB’s outreach plan in 2023. The team partnered with various elected officials to reach and engage with vulnerable and underserved seniors. These fairs were hosted at senior centers where vendors and organizations had tables and activities. The WRB staff attended several of these events, with seventeen being specifically hosted by elected officials such as then-Council President Clarke, Councilmember Katherine Gilmore Richardson, Councilmember Cindy Bass, and State Representative Regina Young. Senior fairs provided a unique opportunity to address the needs of the elderly population, answer questions about affordability programs in a one-on-one format, and build personal relationships between customers and WRB staff.

Every Wednesday throughout the year, PWD staff hosted Assistance Clinics. Some were in person, though most were virtual, and they provided customers one-on-one help accessing water assistance programs. In addition to PWD programs, customers received information on PAHAF and LIHWAP grants available to eligible PWD customers.

In early 2023, the WRB hosted a delinquency clinic in partnership with Oxford Circle Christian Community Development Association (OCCDA) and Councilmember Kendra Brooks. OCCDA has a strong presence and reputation in the community. The team ran reports of the proposed location to identify customers behind in their accounts within a one-mile radius of the clinic. Letters were sent to each customer inviting them to the clinic for the opportunity to explore payment options and sign up for the best program according to their situation. The clinic hosted representatives from Revenue, both the Water Revenue and Tax Bureaus.



Language Access:

The community has continued to request more documents in different languages throughout the year. In response, PWD has translated print outreach and explanation materials in multiple languages, including Spanish, French Creole, and Simplified and Traditional Chinese. A full list of the materials can be found here: <https://www.phila.gov/documents/water-bill-customer-assistance-application-and-documents/>

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 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, 2023, the City enrolled **8,413 customers in TAP**. This number includes 2,770 that were enrolled through pre-qualification. This enrollment is slightly lower than the 2022 number, but fewer customers left TAP than in previous years, resulting in TAP participation reaching an all-time high by the end of 2023. The enrollees had **approximately \$14.6 M in water account arrears** at the time of enrollment. For consistency between reports, water account arrears are labeled “Pre-TAP Debt.” Table 4 shows the breakdown of these TAP enrollees in income ranges with respect to the Federal Poverty Guideline, and Table 5 shows those same enrollees by level of pre-TAP arrears.

Table 4. New Applicants Enrolled in TAP in 2023

Income Level as Compared to Federal Poverty Guideline	Total Enrollees	Total Pre-TAP Debt ⁶
Up to 50%	2,477	\$4,095,749.42
Above 50% and up to 100%	3,341	\$5,784,907.09
Above 100% and up to 150%	2,389	\$4,027,471.32
Above 150% and up to 250%	173	\$569,312.26
Above 250%	33	\$108,316.68
<i>Total</i>	8,413	\$14,585,756.77

⁶ 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 4 and Table 5. 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 5. Total Debt of Applicants Enrolled in TAP in 2023

Debt Range	Total Enrollees	Total Pre-TAP Debt⁷
< \$0	235	\$(137,648.80)
\$0–\$200	2,212	\$170,926.83
\$200–\$500	1,282	\$440,978.68
\$500–\$1,000	1,528	\$1,118,688.98
\$1,000–\$2,000	1,422	\$1,993,027.01
\$2,000–\$5,000	970	\$3,009,030.51
\$5,000–\$10,000	487	\$3,419,313.36
\$10,000–\$20,000	227	\$3,132,753.32
\$20,000–\$50,000	49	\$1,227,216.56
\$50,000+	1	\$73,821.52
<i>Total</i>	8,413	\$14,585,756.77

⁷ 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 5).

4.2 APPLICANTS NOT ENROLLED IN TAP

In addition to the 8,413 applicants enrolled in TAP (see Table 4, above) during 2023, a total of 4,002 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 provided a more affordable alternative than TAP; and 3) those whose applications had some other outcome, like being withdrawn by the customer.

As of December 31, 2023, there were 26,218 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. Applicants Not Enrolled in TAP

Outcome	Total Count
Denied	
Failed to meet Income and Residency Guidelines	3
Failed to meet Income Guidelines (no Special Hardship)	220
Failed to meet Residency Guidelines	268
Installation Type Not Eligible for TAP	13
Missing or Invalid Income or Residency Documentation	1,812
Missing information on application form	58
Not the Customer applying	521
<i>Total Denials</i>	2,895
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill⁸	402
Senior Citizen Discounted Bill + Extended Payment Agreement	96
Regular Bill⁹	117
Regular Bill + Extended Payment Agreement	441
WRBCC Agreement	9
<i>Total More Affordable Alternative Placements</i>	1,065
Other Outcomes	
Customer Withdrew Application	-
Data Transfer¹⁰	42
<i>Total Other Outcomes</i>	42
<i>Total Applicants Not Enrolled in TAP</i>	4,002

⁸ Senior Citizen Discounted Bill may also include a standard payment agreement. Standard agreements are reported in Section 4.3, below.

⁹ Regular Bill may also include a standard payment agreement. Standard agreements are reported in Section 4.3, below.

¹⁰ Data Transfer outcomes occur when an application in progress is transferred to a newer application for the same customer – which could include applications generated through the pre-qualification enrollment process or when 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, 2023, there were 3,200 active payment agreements between residential water customers and WRB. Of these agreements, 2,442 (76%) were created in 2023, while 758 (24%) were created in previous years and were still ongoing as of the end of 2023. 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 agreements were introduced during 2017 to allow customers to catch up on missed TAP payments.
6. TAP Landlord Payment Agreements: TAP Landlord agreements are temporary agreements that represent a transition between TAP participation and a standard agreement for residential property owners once a new tenant becomes a customer and the owner is no longer residing at the location, therefore no longer eligible for TAP.

The 2,442 active residential agreements created in 2023 were made up of 1,451 First Standard Agreements, 723 Second Standard Agreements, 9 Water Revenue Bureau Conference Committee (WRBCC) Agreements, 244 Extended Payment Agreements, 14 TAP Payment Agreements and 1 TAP Landlord Payment Agreement. Active residential agreements created in 2023 cover roughly \$4.9 M in principal debt, \$500,000 in penalties and \$140,000 in other fees (such as returned check fees).

Table 7, Table 8, and Table 9 provide counts for active residential agreements as of December 31, 2023, by term range along with the principal, penalties, and other fees covered under the agreements. Table 7 shows information for agreements created in 2023; Table 8 shows agreements created before 2023; and Table 9 shows all agreements (the sum of agreements shown in Table 7 and Table 8).

Table 7. Active (as of 12/31/23) Residential Agreements Created in Calendar Year 2023

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	235	\$171,169.97	\$9,099.21	\$2,090.92
13–24 Months	977	\$1,300,064.10	\$89,398.84	\$25,022.86
25–36 Months	87	\$168,894.42	\$11,375.52	\$5,213.95
37–48 Months	45	\$128,682.97	\$9,199.93	\$3,522.20
49–60 Months	106	\$595,624.38	\$57,591.74	\$13,587.20
>60 Months	1	\$20,509.10	\$601.30	\$91.45
<i>Total First Standard Agreements</i>	1,451	\$2,384,944.94	\$177,266.54	\$49,528.58
Second Standard Agreements				
0–12 Months	70	\$83,500.68	\$7,346.92	\$2,727.70
13–24 Months	292	\$489,268.94	\$52,918.64	\$15,954.16
25–36 Months	141	\$277,436.31	\$28,457.21	\$12,912.63
37–48 Months	67	\$197,618.77	\$22,392.03	\$8,565.05
49–60 Months	153	\$755,296.28	\$102,191.06	\$27,118.73
<i>Total Second Standard Agreements</i>	723	\$1,803,120.98	\$213,305.86	\$67,278.27
WRBCC Agreements				
0–12 Months	9	\$18,530.12	\$722.31	\$116.45
<i>Total WRBCC Agreements</i>	9	\$18,530.12	\$722.31	\$116.45
Extended Payment Agreements				
13–24 Months	41	\$37,073.59	\$3,291.98	\$770.15
25–36 Months	26	\$37,552.60	\$5,044.44	\$1,575.30
37–48 Months	14	\$26,644.29	\$2,913.50	\$1,232.40
49–60 Months	8	\$26,102.73	\$2,043.60	\$888.05
>60 Months	155	\$534,861.90	\$68,117.73	\$20,357.60
<i>Total Extended Payment Agreements</i>	244	\$662,235.11	\$81,411.25	\$24,823.50
TAP Payment Agreements				
0–12 Months	12	\$5,752.22	\$0.00	\$20.00
25–36 Months	1	\$1,510.16	\$0.00	\$0.00
49–60 Months	1	\$1,226.45	\$0.00	\$0.00
<i>Total TAP Payment Agreements</i>	14	\$8,488.83	\$0.00	\$20.00
TAP Landlord Agreements				
0–12 Months	1	\$112.50	\$0.00	\$0.00
<i>Total Landlord Payment Agreements</i>	1	\$112.50	\$0.00	\$0.00
<i>Total of During Agreements</i>	2,442	\$4,877,432.48	\$472,705.96	\$141,766.80

Table 8. Active (as of 12/31/23) Residential Agreements Created Before 2023

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	3	\$4,768.39	\$632.08	\$365.80
13–24 Months	180	\$316,453.10	\$18,388.71	\$10,574.88
25–36 Months	57	\$168,147.67	\$10,545.34	\$6,582.95
37–48 Months	27	\$81,029.02	\$5,297.42	\$3,300.97
49–60 Months	89	\$574,170.62	\$82,489.22	\$14,655.58
>60 Months	1	\$5,020.91	\$4,115.33	\$80.00
<i>Total First Standard Agreements</i>	357	\$1,149,589.71	\$121,468.10	\$35,560.18
Second Standard Agreements				
0–12 Months	4	\$6,054.53	\$537.17	\$365.80
13–24 Months	25	\$45,070.96	\$3,289.86	\$1,226.42
25–36 Months	45	\$96,520.52	\$11,401.13	\$5,625.75
37–48 Months	24	\$81,665.85	\$15,977.73	\$2,917.70
49–60 Months	64	\$318,113.67	\$61,496.23	\$10,738.12
<i>Total Second Standard Agreements</i>	162	\$547,425.53	\$92,702.12	\$20,873.79
Extended Payment Agreements				
13–24 Months	4	\$5,720.16	\$251.40	\$365.80
25–36 Months	6	\$14,227.34	\$1,205.97	\$477.25
37–48 Months	5	\$12,022.51	\$1,701.12	\$577.25
49–60 Months	10	\$20,022.51	\$1,197.14	\$863.05
>60 Months	214	\$1,085,908.95	\$129,883.28	\$25,418.43
<i>Total Extended Payment Agreements</i>	239	\$1,137,901.47	\$134,238.91	\$27,701.78
<i>Total of Before Agreements</i>	758	\$2,834,916.71	\$348,409.13	\$84,135.75

Table 9. Summary of All Active (as of 12/31/23) Residential Agreements

Agreement Type by Term Range	Count	Principal	Penalties	Other Fees
First Standard Agreements				
0–12 Months	238	\$175,938.36	\$9,731.29	\$2,456.72
13–24 Months	1,157	\$1,616,517.20	\$107,787.55	\$35,597.74
25–36 Months	144	\$337,042.09	\$21,920.86	\$11,796.90
37–48 Months	72	\$209,711.99	\$14,497.35	\$6,823.17
49–60 Months	195	\$1,169,795.00	\$140,080.96	\$28,242.78
>60 Months	2	\$25,530.01	\$4,716.63	\$171.45
<i>Total First Standard Agreements</i>	1,808	\$3,534,534.65	\$298,734.64	\$85,088.76
Second Standard Agreements				
0–12 Months	74	\$89,555.21	\$7,884.09	\$3,093.50
13–24 Months	317	\$534,339.90	\$56,208.50	\$17,180.58
25–36 Months	186	\$373,956.83	\$39,858.34	\$18,538.38
37–48 Months	91	\$279,284.62	\$38,369.76	\$11,482.75
49–60 Months	217	\$1,073,409.95	\$163,687.29	\$37,856.85
<i>Total Second Standard Agreements</i>	885	\$2,350,546.51	\$306,007.98	\$88,152.06
WRBCC Agreements				
0–12 Months	9	\$18,530.12	\$722.31	\$116.45
<i>Total WRBCC Agreements</i>	9	\$18,530.12	\$722.31	\$116.45
Extended Payment Agreements				
13–24 Months	45	\$42,793.75	\$3,543.38	\$1,135.95
25–36 Months	32	\$51,779.94	\$6,250.41	\$2,052.55
37–48 Months	19	\$38,666.80	\$4,614.62	\$1,809.65
49–60 Months	18	\$46,125.24	\$3,240.74	\$1,751.10
>60 Months	369	\$1,620,770.85	\$198,001.01	\$45,776.03
<i>Total Extended Payment Agreements</i>	483	\$1,800,136.58	\$215,650.16	\$52,525.28
TAP Payment Agreements				
0–12 Months	12	\$5,752.22	\$0.00	\$20.00
25–36 Months	1	\$1,510.16	\$0.00	\$0.00
49–60 Months	1	\$1,226.45	\$0.00	\$0.00
<i>Total TAP Payment Agreements</i>	14	\$8,488.83	\$0.00	\$20.00
TAP Landlord Agreements				
0–12 Months	1	\$112.50	\$0.00	\$0.00
<i>Total Landlord Payment Agreements</i>	1	\$112.50	\$0.00	\$0.00
<i>Total of all Agreements</i>	3,200	\$7,712,349.19	\$821,115.09	\$225,902.55

4.4 CUSTOMERS DEFAULTING FROM TAP

PWD Regulations Section 206.6(c)¹¹ describes the reasons a customer may be removed from TAP.

During 2023, there were 13 cases of TAP participants defaulting from TAP, all for failure to successfully recertify. Of those, six did not respond to the recertification, six had their recertification denied, and one had a more affordable regular bill. Table 10 below describes the outcome of these recertification applications. There were no defaults for submitting intentionally false information or 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. It should be noted that the total number of defaults in 2023 was significantly smaller than the number of TAP defaults in 2022, due largely to the extension of the recertification period.

Table 10. Customers Defaulting from TAP

Outcome	Count
Did Not Respond	6
Denied	
Failed to meet Income and Residency Guidelines	-
Failed to meet Income Guidelines (no Special Hardship)	2
Failed to meet Residency Guidelines	1
Installation Type Not Eligible for TAP	-
Missing or Invalid Income or Residency Documentation	3
Missing information on application form	-
Not the Customer applying	-
<i>Total Denials</i>	6
Enrolled in More Affordable Alternative	
Senior Citizen Discounted Bill	-
Senior Citizen Discounted Bill + Extended Payment Agreement	-
Regular Bill	1
Regular Bill + Extended Payment Agreement	-
<i>Total More Affordable Alternative Placements</i>	1
Other Outcomes	
Data Transfer	-
<i>Total Other Outcomes</i>	-
<i>Total Customers Defaulting from TAP</i>	13

¹¹ “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.”

5. CONCLUSION

In 2023, the City continued to successfully operate an effective and supportive customer assistance program. The program maintained many more customers than in years past, while seeing the introduction of pre-qualification and the potential addition of many eligible customers. At the same time, PWD and WRB focused on being responsive to customers' needs, building relationships, and meeting customers where they are.

During 2023, WRB **enrolled 8,413 customers in TAP. As of December 2023, there were 21,694 active TAP participants.** Some of these customers are beginning their sixth year of TAP participation. Staff and partners have continued to improve processes and communications to keep the program operating smoothly and are ready to adapt to significant changes in the years to come.