Water Residential Assistance Program Evaluation

Program Successes and Opportunities for Improvement

October 2020

PSC

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DRAFT

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Table of Contents

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Executive Summary

Water is the most essential utility delivered to homes each day. It meets the drinking and sanitation needs for millions of Michiganders and provides vital assistance to other sectors, from fire protection to irrigation. However, as the cost demands on the treatment and delivery of water continue to rise, paying water bills can be a challenge for many with low to moderate incomes, including those in Southeast Michigan. The ramifications for unpaid bills can impact households and utilities alike, leading to health and economic concerns and—in some cases—water shutoffs, which generate other worries for individuals and families.

While the federal government has created assistance programs to help households with low incomes and older adults afford energy and telecommunication services, there are no federally supported programs for water and sewerage services (Pierce 2020). The State of Michigan makes funding available for water and sewer assistance, but these funds are only available for emergencies and have not been widely used (MDHHS n.d.). In the absence of any national or broadly available state programs to protect consumers with low incomes, the Great Lakes Water Authority (GLWA) created the Water Residential Assistance Program (WRAP), which provides a long-term, sustainable funding source to provide relief for qualifying residents in GLWA member communities. For these residents, the program is critical to keeping the water flowing and supporting self-sufficiency. Though WRAP provides an important lifeline for households in need the program cannot, on its own, address the full breadth of need and must be part of more comprehensive solutions.

WRAP has provided essential assistance across GLWA's service area, combining bill payment, arrearage forgiveness, and conservation measures, including minor plumbing repairs and replacement, with educational and wraparound services. This program is an important component of GLWA's mission to provide its member communities and their customers with water of unquestionable quality and excellent treatment service. Now in its fifth year, GLWA has set out to assess the program's success and identify opportunities for improvement . To support this effort, GLWA engaged Public Sector Consultants (PSC) to evaluate how effectively the program has met its goals and what changes are necessary to improve its delivery and impact.

PSC conducted a thorough assessment of WRAP, relying on an analysis of program reporting data, key stakeholder feedback, and a review of other relevant documents. Through this effort, PSC identified a number of successes and opportunities for improvement. In terms of program success, overall, stakeholders viewed WRAP as providing an important resource for low- to moderate-income households. Stakeholders also highlighted that the program's structure helps promote on-time bill payment and water conservation. From the customer experience perspective, the program's income and eligibility requirements provide flexibility, enabling households to access assistance more easily. Additionally, modifications adopted in the last few years have helped expand access to assistance and better meet customers' needs.

While the WRAP has demonstrated success, there are several opportunities for improvement. A review of program reporting data highlighted limited use of defined and existing performance measures—as outlined in the *2015 WRAP Program Design Report*—and a lack of established benchmarks for program measurement. Most reporting relates to process measures, focusing on measuring program operations and service delivery instead of outcomes-oriented measures that would address impact.

In addition to updating performance reporting, the evaluation demonstrated opportunities to improve program administration. One of the perceived strengths of the current administration was the ability to serve households throughout GLWA's service territory; however. program uptake and adoption has been limited in some communities. More needs to be done to expand program reach, including establishing community-specific performance benchmarks, amplifying marketing and communications efforts, and leveraging other community resources and partnerships.

Program design also presents barriers. For example, some GLWA customers cannot enroll in WRAP because their community has not opted into the program, while others might not achieve success because their income is too low to make necessary payments toward their monthly bill. These design elements produce gaps for households who might be in need. By including options for customers to receive assistance directly from the program administrator or by creating more tailored assistance options, GLWA can work to ensure a more inclusive program.

Improving WRAP will require additional support to implement and oversee program changes on behalf of GLWA. By taking a more involved role with program oversight, GLWA can support the development and monitoring of established performance measures, support outreach to member partner communities, and facilitate ongoing program evaluation.

The following evaluation report provides a deeper exploration of findings related to WRAP.

Background

WRAP provides sustainable funding for qualifying households with low incomes throughout GLWA's participating member partner communities. The GLWA funds the program at an amount equal to 0.5 percent of budgeted revenues, with the budgeted fiscal year 2021 funding level of $6.1 million combined for water and sewer services (GLWA April 2020).

Since the program's creation in 2016, the Wayne Metropolitan Community Action Agency (Wayne Metro) has administered WRAP. Wayne Metro—a nonprofit agency headquartered in Detroit—provides access to a host of programs to support residents with low incomes throughout Wayne County. To better serve the entirety of GLWA's service area in Southeast Michigan, the Wayne Metro has partnered with Macomb Community Action (MCA), the Oakland Livingston Human Services Agency (OLHSA), the Genesee County Community Action Resource Department (GCCARD), and the Monroe County Opportunity Program (MCOP) to deliver WRAP in all eight counties served by GLWA.

The program provides eligible households with monthly bill payment and arrearage assistance as well as home water audits and conservation services. To become eligible, customers must demonstrate their household income is below 200 percent of the federal poverty line (FPL).[1] Bill payment assistance of $25 per month is available for eligible renters and homeowners for up to two years as long as they continue to make on-time utility bill payments. Households can also receive up to $700 per year in assistance payments toward past due balances. A recent program change enabled qualifying older adults with low incomes and persons with disabilities to remain on the program after the original two-year period. High-volume water users—defined as households that consume 120 percent more than the average household—can also receive a home water use audit and water conservation services, including minor plumbing repairs and replacement of kitchen and bath fixtures. The cap on conservation services is $2,000 per household and the average conservation assistance per household must not exceed $1,500. Another program change put in place in recent years, allowed renters to take advantage of conservation services in cases where they are responsible for the water bill.In addition to direct forms of assistance, WRAP participants can take advantage of financial coaching and water conservation workshops as well as other support services provided through Wayne Metro and other community action agency partners serving GLWA service area.

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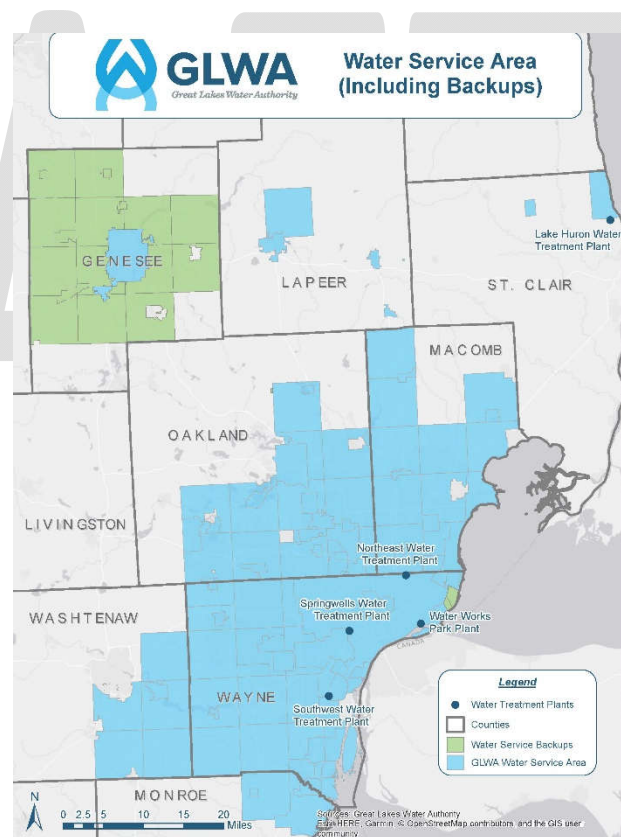
[1] Prior to January 2019, income eligibility for the WRAP was set at 150 percent FPL, which aligns with other utility assistance programs.

WRAP began providing assistance on March 1, 2016. As of June 30, 2020, it has committed more than $16.8 million in assistance and conservation funds to more than 21,187 qualified participants. To be eligible, each member partner community must opt-in to the program before customers can receive assistance. To date, 77 communities have opted into WRAP (see Appendix A).

Methodology

GLWA engaged Public Sector Consultants to conduct an evaluation of WRAP, with the goal of strengthening the program's effectiveness and informing potential design changes. In service of that, this evaluation assesses program operations and considers delivery improvements to achieve key program objectives. To this end, PSC's evaluation was conducted in two parts—an outcomes assessment and process evaluation.

Outcome Assessment

The PSC team collected and analyzed available data pertaining to the program's outcomes and specified goals. WRAP administrator—the Wayne Metro—provides data to GLWA staff through annual program summary reports. The reports also include a breakdown of program data across partner community action agencies. This information is compiled in a way that reports include data from previous years rolled up into the current year's data instead of annual reports with data from the prior year only. For example, the June 2017 report covers program activity from March 1, 2016, through June 30, 2017, while the June 2018 report included data from March 1, 2016, through June 30, 2018. To enable year-to-year comparisons, PSC used the provided program summary data to calculate annual program summary data for the four years reports were provided.[2] In total, four program summary reports were provided, which covered the following program years:

- 2017 program year: March 1, 2016, to June 30, 2017
- 2018 program year: March 1, 2016, to June 30, 2018
- 2019 program year: March 1, 2016, to June 30, 2019
- 2020 program year: March 1, 2016, to June 30, 2020

PSC reviewed the data against the *2015 WRAP Program Design Report's* goals and performance measures. Where possible, PSC analyzed how WRAP has performed in relation to articulated goals. In cases where necessary data were not provided, PSC mentions the data required to adequately assess these goals or performance measures, ways to improve data collection and reporting, and considerations for making more outcome-oriented data.

Process Evaluation

The second component of this evaluation focused on assessing WRAP's current administration and understanding GLWA member partner communities' perspectives to define program successes and

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[2] In some cases, conversion of year-to-date data to annual data yielded a negative value (e.g., a negative number of shutoffs avoided), indicating a data entry error. PSC reviewed these calculations thoroughly to identify potential issues with data processing. In situations where data errors could not be rectified, PSC used year-to-date data. As such, data are labeled cumulative when the metric is presented as it appears in the year-to-date reports and annual when calculations were successful.

opportunities for improvement. PSC structured this work as a series of stakeholder interviews and focus group discussions, which took place from August to October with GLWA Board of Directors, its CEO, the Director of the Detroit Water and Sewerage Department (DWSD), member partner communities, community action agencies responsible for program administration, and other stakeholders with program knowledge.

Prior to conducting interviews and focus groups, PSC developed an evaluation framework and discussion guide based on existing program documents. Through these discussions, PSC sought to understand WRAP's essential elements, such as planning and administrative roles, target populations, enrollment processes, terms of participation, outreach and engagement, provision of conservation services, and program sustainability. PSC captured and carefully reviewed these sentiments to identify successful aspects of WRAP and opportunities where it can be improved. Commonly expressed themes are provided with appropriate emphasis to denote strong support. Where conflicting sentiments were recorded, PSC has contextualized these points for further consideration.

Outcomes Assessment

In October 2015, a group of stakeholders from Southeast Michigan presented their Program Design Report for WRAP to GLWA Board of Directors. This report outlined WRAP's establishment as well as a foundation for the program's enduring impact for thousands of households. The report included the following five goals to measure the program's effectiveness.

- **Goal one:** Assist low-income individuals and families with their water and sewer bills
- **Goal two:** Avoid water utility disconnection and reduce account arrearages
- **Goal three:** Assist customers in increasing self-sufficiency, in part through the provision of water conservation measures
- **Goal four:** Promote collaboration on program outreach to consumers and the public via multi-media and multi-lingual information sources.
- **Goal five:** Foster collaboration to advance partnerships for developing and leveraging funding opportunities to deliver assistance (GLWA October 2015).

Additionally, the report included a series of performance measures that enable ongoing assessment of program outcomes relative to goals (a complete inventory of program performance measures is provided in Appendix B.

Using these goals and performance measures as the framework for assessing WRAP's outcomes, PSC reviewed annual program reporting provided by the Wayne Metro to determine whether WRAP's articulated goals are being achieved. The following analysis details the program's performance to date.

Goal One: Assist Low-income Individuals and Families with Their Water and Sewer Bills

The first goal in the *2015 WRAP Program Design Report* captures the program's essential function: providing bill payment assistance to residents with low incomes who need help with their water and sewer bills. In support of measuring progress toward this goal, eight performance measures were identified. While there are generally enough data reported to assess the program's outcomes in relation to

performance measures for goal one, many of these metrics appear more process focused (e.g., money paid out and applications received) and less outcomes oriented (e.g., water/sewer bills and backlog pre- and postprogram participation).

Performance Measure 1.1: Number of Completed Applications

Annual program reporting includes the number of enrollment appointments and completed preapplications. From the data, all scheduled appointments result in completed preapplications for WRAP. From March 2016 to June 2020, 55,731 households completed preapplications. On average, the number of preapplications completed annually for Wayne Metro was 11,664; for OLHSA, it was 1,185; for MCA, 544; GCCARD, 718; and the average number of yearly preapplications completed was 13,933. MCOP only reported two appointments and applications during the four-year period. The number of applications received annually for the program's first four years indicates a consistent need for WRAP. Exhibit 1 portrays the number of completed applications over time.

EXHIBIT 1. Number of Completed Preapplications
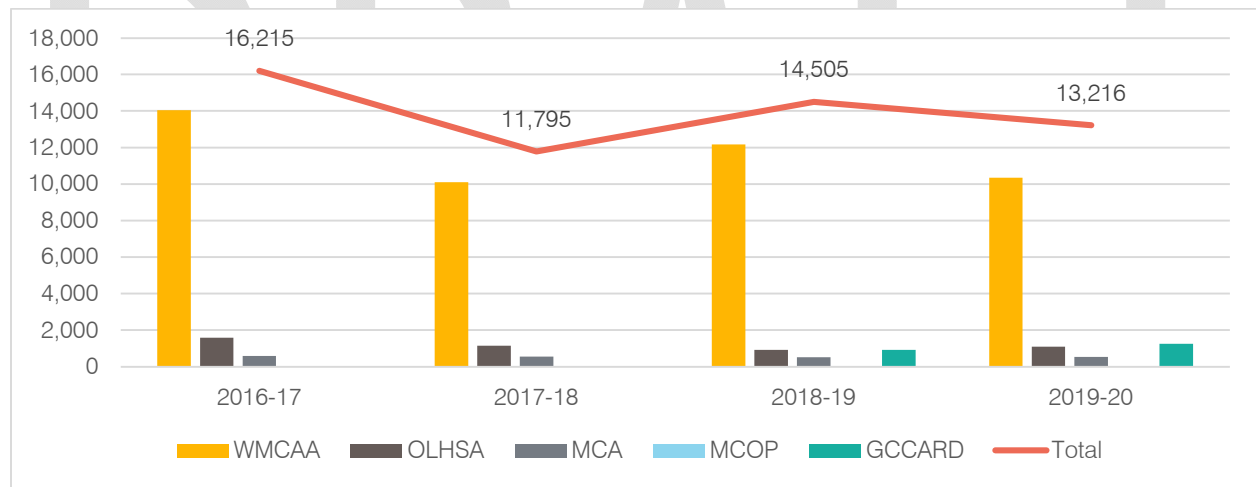
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro.

Performance Measure 1.2: Number of Applicants Ineligible for Participation

Program reporting provides the number of unenrolled applicants, including supplemental funds, which appears to be the closest corollary to applicants determined ineligible for participation.[3] The average number of unenrolled applicants per year for the Wayne Metro was 7,220; for OLHSA, the number was 634; for MCA, 463; GCCARD, 426; and the average number of yearly preapplications completed was 8,636. The two completed applications for the MCOP were both unenrolled in the program's first year.

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[3] It is possible the number of unenrolled households provided in program reports contains other households than those who were simply ineligible for the program at enrollment, such as households that enrolled in the program but were later removed.

EXHIBIT 2. Number of Unenrolled Applicants
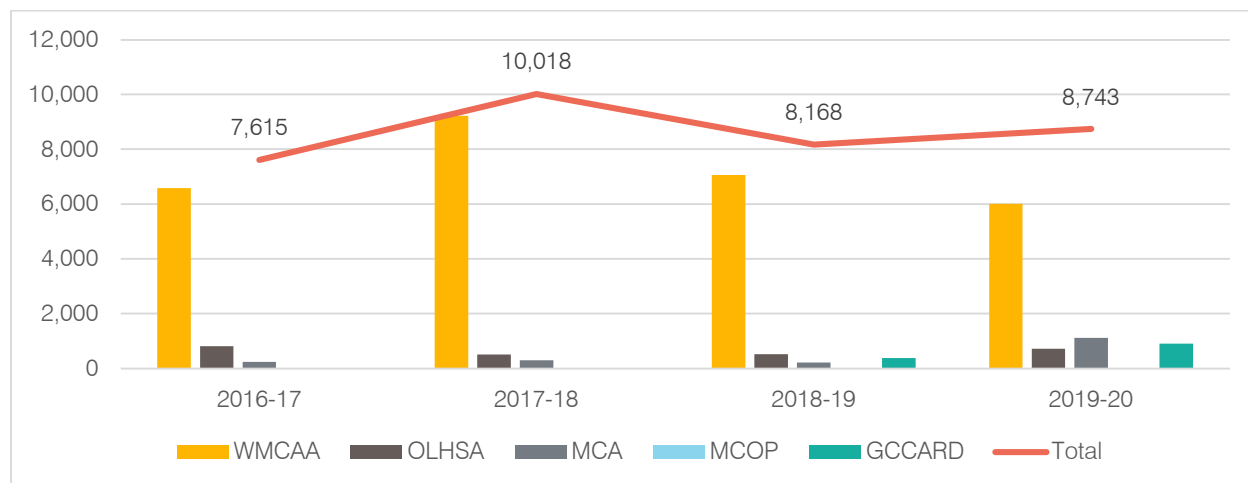
Source: Analysis of Annual WRAP Program Summaries provided by the Wayne Metro.

By comparing the number of completed preapplications to the number of unenrolled applicants, PSC was able to calculate the percentage of applicants unenrolled annually. The percentage of households applying for the program that were unenrolled ranged from 47 percent in 2016 to nearly 85 percent in 2017. This increase appears to be driven by a sharp rise in unenrollment from the Wayne Metro, which reported 91.3 percent, or 9,225, of the 10,102 completed preapplications received from July 1, 2017, to June 30, 2018, resulted in an unenrolled households. The percentage of unenrolled households remained relatively static in subsequent years but rose to 66 percent in the most recent year. In total, for the first four years of WRAP, 62 percent of completed preapplications resulted in unenrollment (Exhibit 3).

EXHIBIT 3. Percentage of Completed Preapplications Unenrolled in the Program
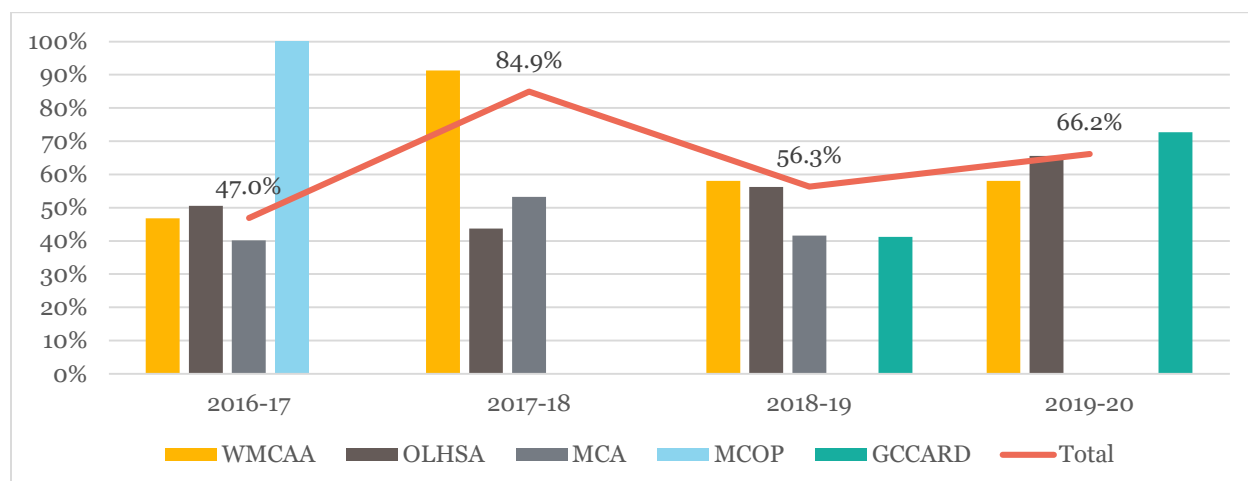
Source: Analysis of Annual WRAP Program Summaries provided by the Wayne Metro.

Performance Measure 1.3: Number of Households Assisted

Determining the number of households assisted is straightforward. Annual program reports include the number of households enrolled in WRAP since its inception. Since 2016, more than 22,033 households have been enrolled. Of those, the Wayne Metro has served 80 percent, OLHSA has served 10 percent, the GCCARD has served 4 percent, and MCA has served just over 5 percent.

EXHIBIT 4. Cumulative Households Enrolled in WRAP, March 1, 2016, through June 30, 2020
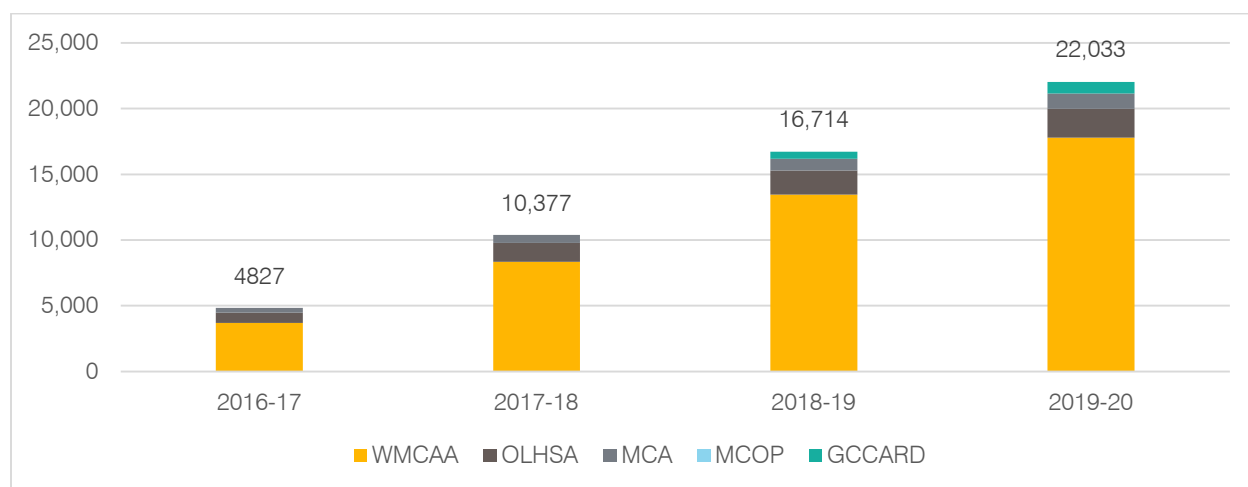
Source: Analysis of Annual WRAP Program Summaries provided by the Wayne Metro.

On average, 5,297 new households have been enrolled in the program each year. The majority of these enrollments come from the Wayne Metro, which averaged 4,445 households. The OLHSA added an average of 552 new households per year, while MCA and the GCCARD added a little more than 290.

The majority of households enrolled in the program come from Wayne County, representing 80 percent of all WRAP households. Of this population, 79 percent were from Detroit. The Wayne Metro also provides services to participating communities in Washtenaw County, though few households have been enrolled. Oakland County has the next highest number of households served at 2,177. The OLHSA was previously tasked with providing WRAP to customers in Washtenaw and Genesee Counties, but other entities (Wayne Metro and GCCARD) have taken on this role since July 2018. After Oakland County, Macomb County has the third-largest population of households enrolled in WRAP with 1,172. MCA, which services Macomb County, also services Lapeer and St. Clair Counties; however, no households have been enrolled from these areas. The GCCARD began servicing Flint in July 2018 and has since enrolled 875 customers. A complete breakdown of household enrollment by community is provided in Exhibit 5.

EXHIBIT 5. Households Enrolled by Community Served, March 1, 2016, Through June 30, 2020

Service Provider	Community Served	Households Enrolled	Percentage of Households Enrolled
Wayne Metro	City of Detroit	14,059	79.1%
	Out-Wayne County	3,661	20.6%

|			
	Washtenaw County (after June 30. 2018)	59	0.3%
	Subtotal	**17,779**	**80.7%**
OLHSA	Oakland County	2,177	98.6%
	Washtenaw County (before July 1, 2018)	30	1.4%
	Genesee County (before July 1, 2018)	0	0.0%
	Subtotal	**2,207**	**10.0%**
GCCARD	**City of Flint (after June 30, 2018)**	**875**	**4.0%**
MCA	Macomb County	1,172	100.0%
	St. Clair County	0	0.0%
	Lapeer County	0	0.0%
	Subtotal	**1,172**	**5.3%**
MCOP	**Monroe County**	**0**	**0.0%**
Total		**22,033**	

Source: Analysis of Annual WRAP Program Summaries provided by the Wayne Metro.

Performance Measure 1.4: Amount of Assistance Provided Total and Average per Household

Program reporting provides sufficient data to assess the amount of assistance provided and average amounts per household. Assistance provided through WRAP is used for monthly bill payments and/ or paying down past-due bills. Total assistance funding paid out through June 30, 2020, was $9,272,311.71. The average level of assistance paid out per year was more than $2.3 million. Over two-thirds of assistance provided was delivered by the Wayne Metro to households in Wayne County. A full breakdown of assistance funding is provided in Exhibit 6.

EXHIBIT 6. Total Bill Payment and Arrearage Assistance Paid Out, March 1, 2016, Through June 30, 2020
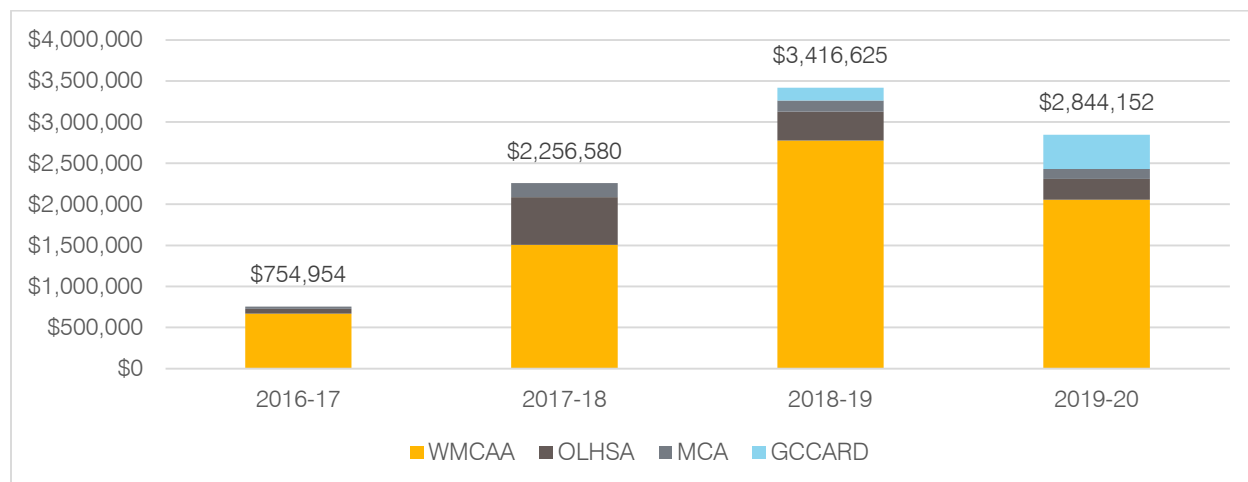
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

In addition to the assessing the funds paid out in each year of the program, assistance data is also available showing the amount of funds committed to assistance for enrolled households. This information captures the funding allocated for future bill payment and arrearage payments that households would receive given continued participation in WRAP. Since March 1, 2016 a total of $13.7 million has been committed to assistance with 67.5 percent of committed funds having been paid out to date. Wayne Metro has the lowest proportion of paid out to committed assistance funds ratio with 36 percent of assistance funds having yet to be paid out. The remaining service providers all have less than 20 percent of their committed funds reserved. A breakdown of funding for assistance is provided below in Exhibit 7.

Exhibit 7. Bill Payment and Arrearage Assistance Funds, March 1, 2016 through June 30, 2020

	Assistance Committed	Assistance Paid Out		Remaining Committed Funds	
Wayne Metro	$11,023,494.39	$7,002,668.92	63.5%	$4,020,825.47	36.5%
OLHSA	$1,484,391.66	$1,241,618.89	83.6%	$242,772.77	16.4%
MCA	$513,163.94	$460,567.00	89.8%	$52,596.94	10.2%
GCCARD	$706,295.26	$567,456.90	80.3%	$138,838.36	19.7%
Total	**$13,727,345.25**	**$9,272,311.71**	**67.5%**	**$4,455,033.54**	**32.5%**

Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Assistance payments provided through WRAP can also be analyzed based on the proportion spent on bill payment assistance in comparison to arrearage forgiveness. Since the program's initiation 59 percent of all assistance funding paid out has been used for bill payment and the remaining 41 percent has gone toward customer arrearage balances. Wayne Metro spent the highest proportion of its funding on bill payment assistance at 64 percent, followed by MCA at 59 percent. OLHSA and GCCARD both spent more of their assistance funding on arrears than bill payment assistance with 42 and 38 percent of funds going to bill payment, respectively. Exhibit 8 provides a breakdown of assistance payments by type of assistance and service provider.
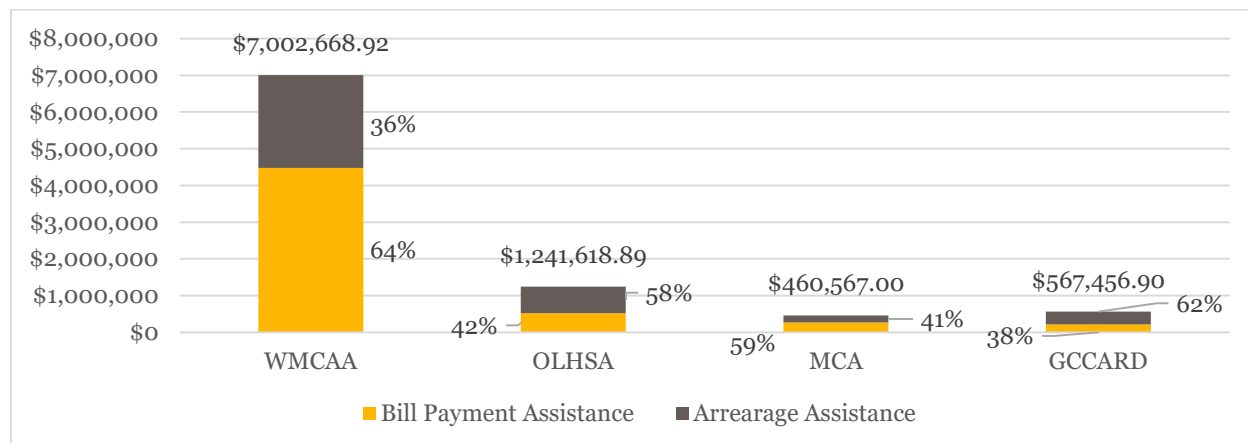
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Annual program reports provide the average assistance per household which is calculated by dividing the total bill payment and arrearage assistance funds committed by the number of enrolled households. This information is not calculated for each year of the program. Instead it appears that the cumulative number of households enrolled and assistance provided have been used to determine average assistance amounts. For the period of March 1, 2016 to June 30, 2020, the program wide average assistance amount was $647.91. GCCARD had the highest average assistance amount per household at $807.19. OLHSA and Wayne Metro were second and third highest in terms of average assistance at $672.58 and $620.03 per household respectively. MCA had the lowest average assistance amount of $437.85. This information is illustrated in Exhibit 8.

Exhibit 8. Average Assistance Committed per Household, March 1, 2016 through June 30, 2020
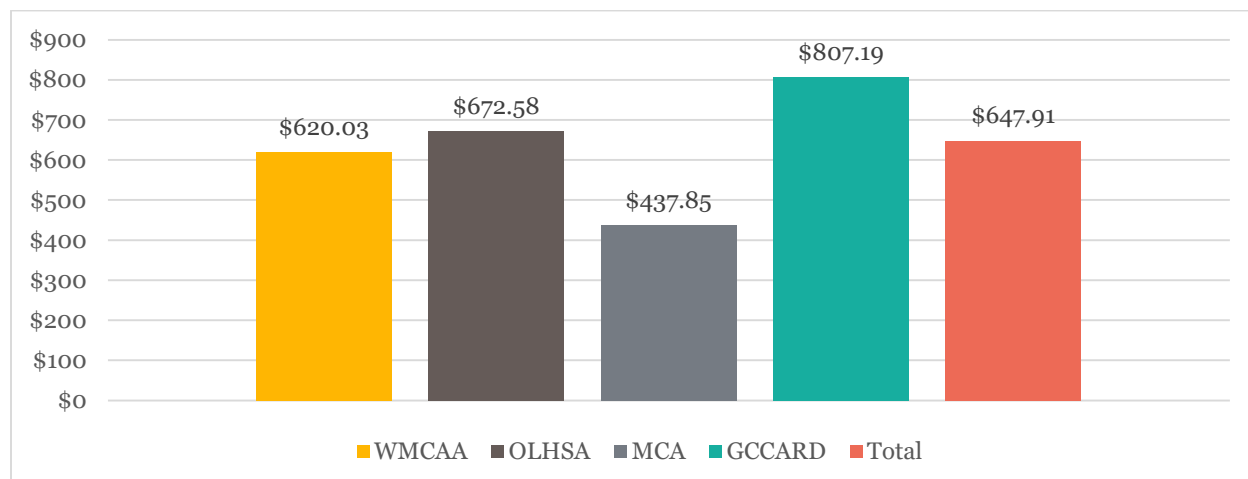
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Performance Measure 1.5: Number of Payments that Meet or Exceed the Estimates Provided

The program summary reports provided by Wayne Metro do not include data for the number of payments that meet or exceed estimates provided. Additionally, it is not clear from the 2015 WRAP Program Design Report whether this metric is referring to assistance payments made by service providers on behalf of customers or bill payments made by customers toward their accounts. Assuming that this performance metric seeks to inform how well WRAP is able to accurately forecast needed assistance funds, future reporting could include a count of the incidences where service providers have had to exceed the level of funds committed at the time of enrollment and the amount of funding that exceeded original commitments. PSC would also suggest, including a field for the reason payments exceeded original estimates to allow for additional understanding of circumstances behind these incidences.

Performance Measure 1.6: Number of Repeat Applicants and Participants

The reported number of repeat applicants was only reported in the 2016-2017 program year. During this period Wayne Metro, OLHSA, and MCA reported a total of 214 repeat applications. It is not clear whether there were no repeat applicants in subsequent years or whether the data was no longer reported for other reasons. Exhibit 9 details the breakdown of repeat applications by service provider.

Exhibit 9. Repeat Applicants, March 1, 2016 through June 30, 2017
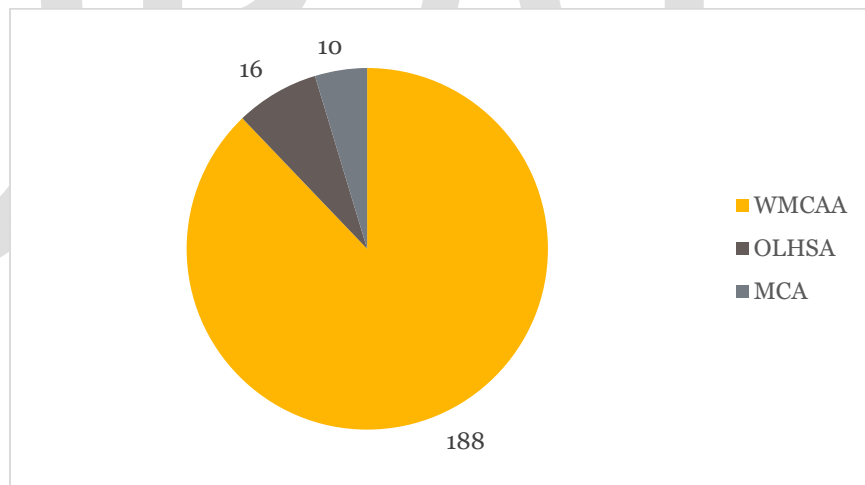
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

WRAP was originally designed as a two-year program where upon completion customers exit the program for one year before being eligible for the program again. In January 2019, GLWA's Board of Directors approved changes to WRAP design to allow eligible low-income senior citizens and disabled persons to remain enrolled in the program after the original two-year period. Since the eligibility was extended beyond two years, 784 households have been enrolled in WRAP for a third year. Of these households 88 percent are from Wayne County with Oakland and Macomb County making up the remainder of enrolled households, shown in Exhibit 10.
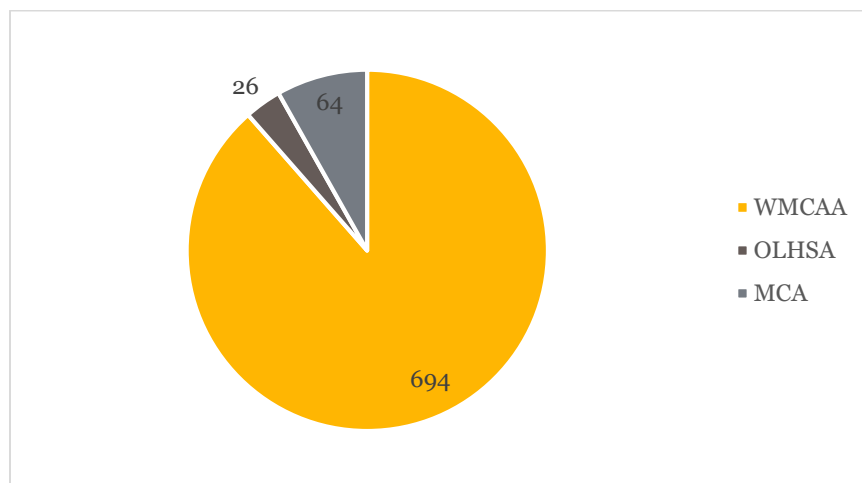
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

There are other potential ways to interpret the performance measure for repeat program participants, such as customers who joined the program in 2016, completed their two-year enrollment in 2018, and have reenrolled in the program following the established waiting period; however, the data provided by Wayne Metro does not indicate that they have tracked these customers.

Performance Measure 1.7: Randomized client satisfaction surveys

The data reported in annual WRAP program summaries is predominantly financial in nature and does not provide insight into other efforts to assess the programs operation. It appears that Wayne Metro conducts customer satisfaction surveys as they have previously presented excerpted results from these surveys in correspondence with GLWA's Audit Committee and Board of Directors. In a January 23, 2019 presentation to the Board of Directors, Wayne Metro provided the following responses from a customer satisfaction survey.

When asked if a customer would recommend Wayne Metro to a friend or family member, over 92 percent they would recommend Wayne Metro "often" or "always". Only 3 percent of respondents indicated they would "never" or "rarely" recommend Wayne Metro. The breakdown of responses is provided below in Exhibit 11.

Exhibit 11. Would you Recommend Wayne Metro to a Friend of Family Member?
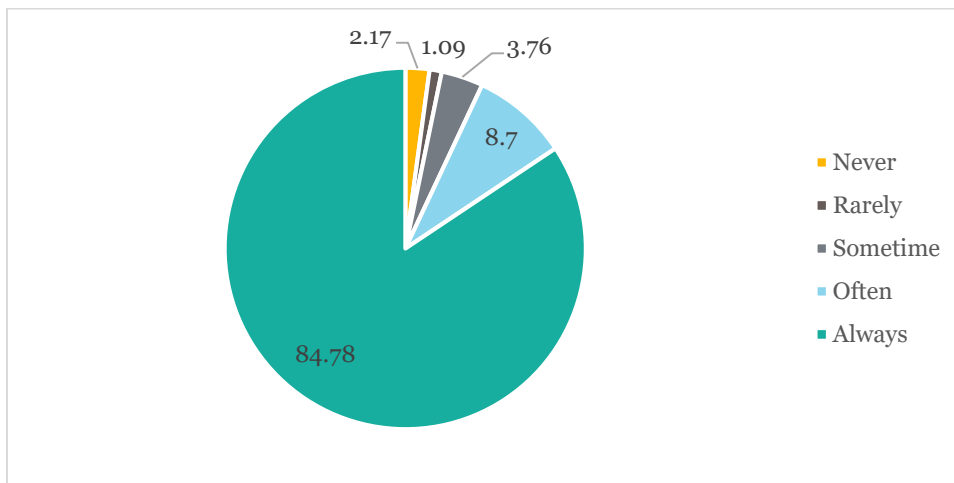
Source: Wayne Metro Community Action Agency. January 23, 2019. *WRAP Workgroup Discussion.*
https://glwater.legistar.com/View.ashx?M=F&ID=6987014&GUID=F9627A5D-848D-488A-A315-9FFDB0546188

When asked what Wayne Metro is good at, open ended responses provided were;

- "Assisting people in need with the economy and water crisis especially in Flint Area."
- "Helping to find solutions to utility problems whether it be financial help or informative help."
- "Jobs, helping people find homes, gaining confidence, resumes and interviewing skills, so much more."

When asked how well Wayne Metro has met their needs, 91 percent responded "good" or "great". Four percent of respondents answered that Wayne Metro was "poor" or "very poor" in terms of meeting their needs. The responses to this question are provided in Exhibit 12.

Exhibit 12. Overall, how well as Wayne Metro met your needs?
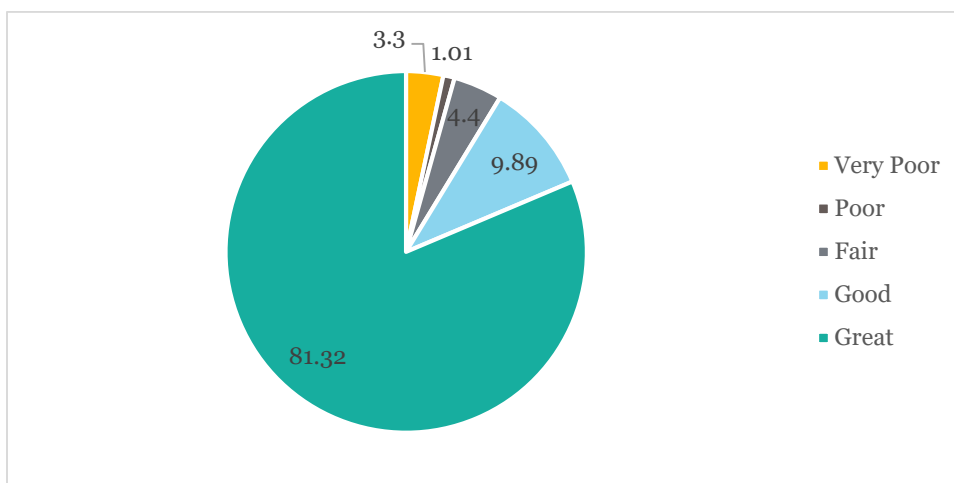
When asked what could Wayne Metro do better, respondents provided the following answers.

- "Negotiate better grace periods with the water company."
- "Be more lenient with clients in regard to second chance reschedules."
- "Maybe they could keep a list of good plumbers so you would know who to trust. And help pay to fix the problem when it comes to bad plumbing."

Overall, this customer satisfaction feedback indicates that Wayne Metro is meeting customer needs, however the questions and responses provided are not specific to the operation of WRAP. As such, PSC has limited ability to assess customer satisfaction as it relates to the program. Where possible, Wayne Metro should provide GLWA with customer satisfaction information specific to WRAP.

Performance Measure 1.8: Application and payment processing timelines

Program reporting data does not include information pertaining to the timeline for application and payment processing. The 2015 WRAP Program Design Report provides benchmarks for these timelines indicating that applications should be processed within five to seven business days from being completed and payments to retail service providers should be made in an average of 30 business days. PSC is unable to determine if Wayne Metro is meeting these objectives with the current reporting. Anecdotal observations from other presentations provided by Wayne Metro and one on one discussion with Wayne Metro staff indicate that there have been consistent efforts made over the past four years to streamline the enrollment process by allowing digital applications through an online services portal. Wayne Metro reports that they are able to get customers enrolled in approximately 30 minutes. More can be done to further validate Wayne Metro assertions and to track processing timelines to ensure customers have access to vital assistance in a timely manner.

Goal Two: Avoid Water Utility Disconnection and Reduce Account Arrearages

The second goal for WRAP focuses on ensuring customers do not lose access to their water service and can pay down past due bills. The 2015 WRAP Program Design Report included three performance measures related to assessing the program's impact related to this goal. PSC determined that the data provided was fairly sufficient for calculating these metrics, however, it was not possible to determine the number of customers for whom arrearages were eliminated or the total amount of arrearages eliminated.

Performance Measure 2.1: Number of Shutoffs Avoided

Determining the amount of service disconnections (shutoffs) avoided as a result of assistance offered through WRAP is a relatively straightforward exercise. Given that customers are not required to be under risk of service disconnection to enroll in the program, not all customers who apply for WRAP can be assumed to have avoided service disconnection. Instead, the annual program summary reports account for households that have successfully avoided service disconnection through their participation in WRAP. Since the program's inception, 6,582 households have been able to avoid service disconnection, representing close to 30 percent of all households enrolled. Nearly 92 percent of households that avoided service disconnection were from Wayne County and of those 85 percent were from the City of Detroit. A complete breakdown of this data is provided in Exhibit 13.

Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

PSC attempted to calculate the number service disconnections avoided on an annual basis to determine how WRAP has performed over time, unfortunately the data did not lend itself to annual comparison. For example, during the March 1, 2016-June 30, 2017 program year Wayne Metro reported 2,591 customers avoided service disconnection. In the following year's program report for March 1, 2016-June 30, 2018 only Wayne Metro only reported 2,020 avoided service disconnections despite having doubled the number of households enrolled in the program over this time period. This discrepancy could be due to an inaccuracy in the data. The other potential explanation considered by PSC was that over 500 of the households that had avoided service disconnection in the previous program year were subsequently disconnected during from July 2017 through June 2018. Similarly, data provided for GCCARD showed that 64 customers avoided service disconnection during the March 1, 2016 to June 30, 2019 reporting period, but in the following year's report there were zero customers shown to have avoided service disconnection.

Performance Measure 2.2: Amount of Arrearages Eliminated

While annual program reporting does provide data related to the amount of arrearage assistance provided and average household arrearages, there is not enough information to assess the number of households for whom arrearages have been completely eliminated upon completion of the program. Due to the program's structure, customers who enter the program with more than $1,400 in arrearages could successfully complete the two-year program and still have arrearages on their bill. Annual reporting data includes the number of households that have more than or less than $700 in arrearages when they enter the program. Theoretically, upon completing the program, all of these households with less than $700 in arrearages would have a zero account balance, by nature of the program requiring on time bill payment for two years and providing up to $700 of arrearage assistance per year. Despite this theoretical possibility, program reporting does not definitively document households whose arrears have been eliminated.

According to available data, 53 percent of households that have an arrearage balance on their bill owe less than or equal to $700. Assuming that all of these households complete the program, it is possible that 9,257 households have been able to successfully pay off these past due balances with support from WRAP. For many of the remaining households, under current program design, the assistance provided would not be enough to fully address past due balances and additional interventions may be required. This could be especially challenging for the nearly 30 percent of households that owe more than $1,050 in arrears (Wayne Metro January 2019). Exhibit 14 shows the number of households with arrears above and below the $700 threshold.

Exhibit 14. Households with Arrearages, by Amount Owed, March 1, 2016 through June 30, 2020

Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Average arrearage balances vary by region across GLWA's service territory. The City of Flint served by GCCARD has the highest average arrearage balance at more than $2,000 per household. For communities served by Wayne Metro the average arrearage balance was $1,573 per household, while households in the City of Detroit had average arrearages in excess of $1,600. Oakland county also had an average household arrearage balance of more than $1,000. Average arrearage balances in Macomb County were significantly lower than other areas, as shown in Exhibit 15.

Exhibit 15. Average Households Arrearage Amount Owed, March 1, 2016 through June 30, 2020

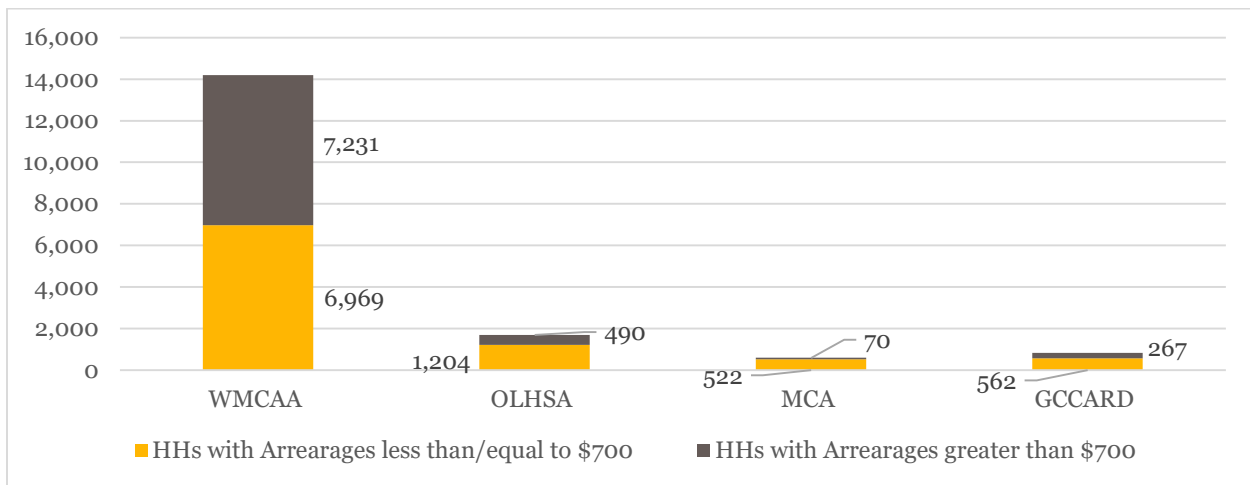Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

There is an issue with consistency in the arrearage data provided in annual program reporting. PSC was unable to reconcile the data provided for of "Households with Arrearages" and separate counts for "Households with Arrearages less than/ equal to $700" and "Households with Arrearages greater than $700". While this information was provided in the same table, there were 2,300 fewer households with arrears listed for Wayne Metro than sum of households with arrears greater than and less than/ equal to $700. This discrepancy only occurs in the program report for March 1, 2016 through June 30, 2020.

Performance Measure 2.3: Amount of Arrearages Paid (Total and Average)

The data necessary to report the total dollar amount of arrearages paid and average amount per household are provided in annual program summaries. Since March 1, 2016, more than $7 million in assistance funding has been committed to paying households' arrears. Of these committed funds, only $3.7 million or 54 percent have yet to be paid out. Given that the majority of customers with arrears are served by Wayne Metro, it is not surprising that majority of funding for arrearage assistance is also committed to Wayne Metro. Despite having the largest share of arrearage assistance funding and the greatest need, Wayne Metro has paid out the lowest proportion of committed funds—totaling 46 percent of funds committed through June 30, 2020. The other three service providers have all paid out over three-quarters of their committed funds for arrearage assistance. This raises questions related to program completion rates for households and whether customers in Wayne Metro's territory are meeting program requirements necessary to receive full arrearage assistance.

Exhibit 15. Total Arrearage Assistance Committed and Paid Out, March 1, 2016 through June 30, 2020
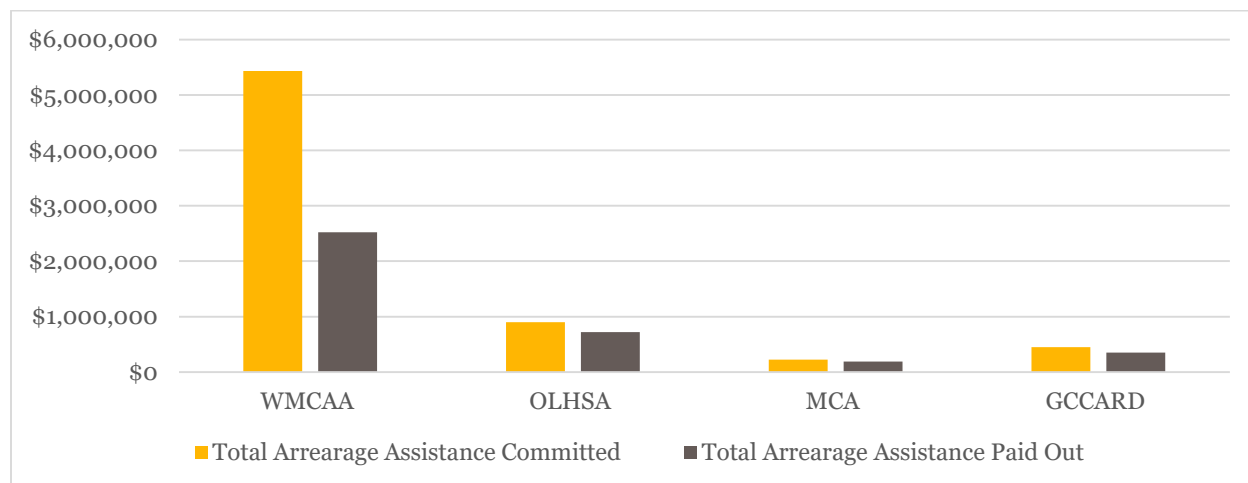
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

The average arrearage assistance amount provided per household was relatively consistent across service providers, averaging $467 for the period of March 1, 2016 through June 30, 2020. Despite having the highest funding commitment, the greatest number of households in need of arrearage assistance, and the second highest average household arrearage balance; Wayne Metro's average arrearage assistance provided was less than the overall average for all service territories. GCCARD and OLHSA had the highest average arrears amount at $541 and $530, respectively. Only MCA provided a smaller amount of arrearage assistance. When compared to the average household arrearage balance, Wayne Metro, OLHSA, and GCCARD provided less than half of the average households' arrearage assistance required to address the need. Exhibit 16 provides a breakdown of average arrearage assistance levels.
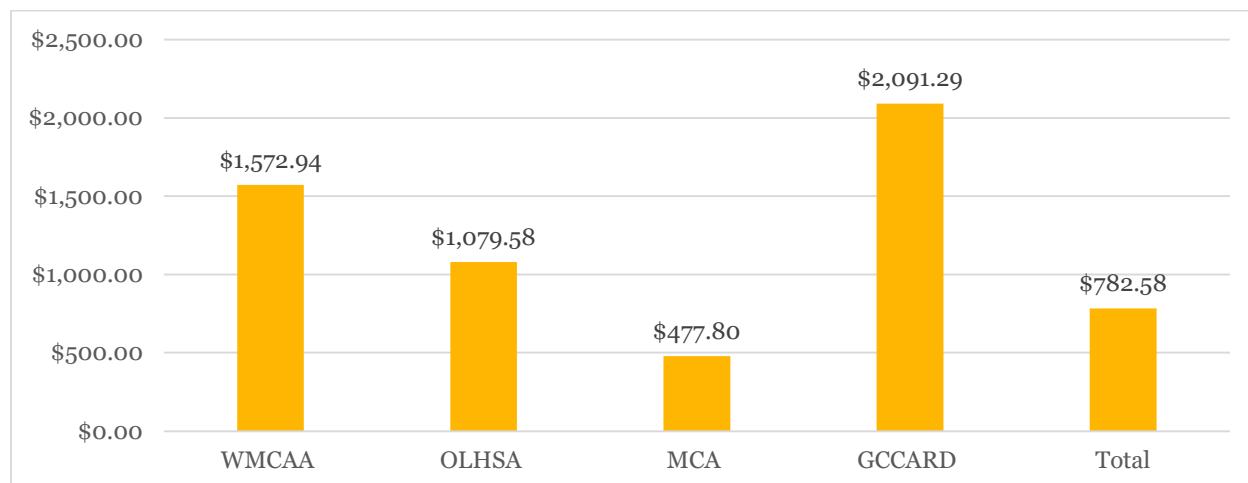
Exhibit 16. Average Household Arrearage Assistance Paid Out, March 1, 2016 through June 30, 2020
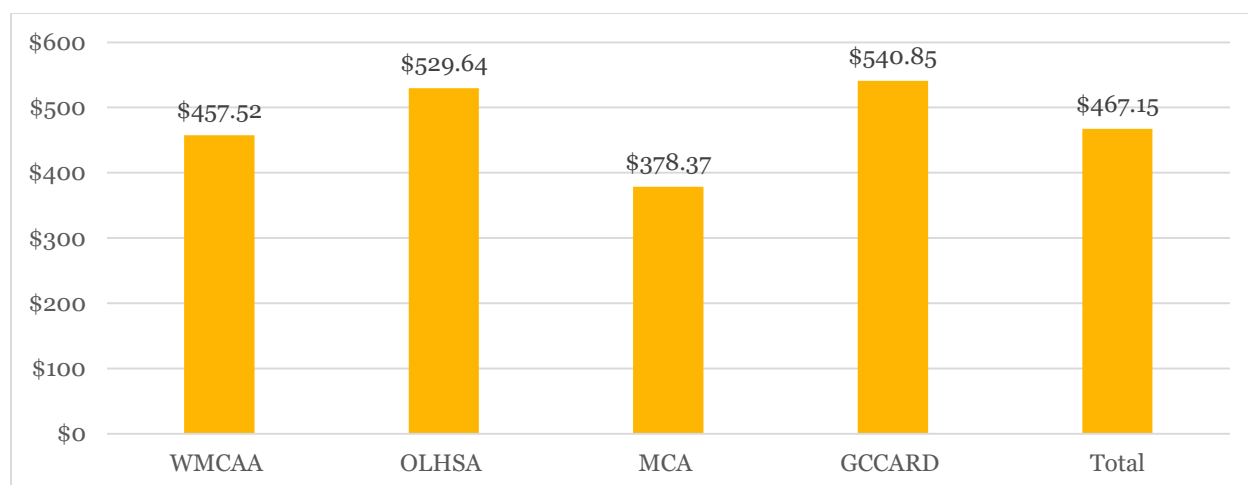
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Goal Three: Assist Clients in Increasing Self-sufficiency, in part through the Provision of Water Conservation Measures

Another key component of WRAP is the provision of water conservation services to help households reduce their water consumption and lower overall bills. Goal three sets out that WRAP should help households toward self-sufficiency through water conservation measures. The 2015 WRAP Program Design Report provides five additional performance measures for assessing whether this goal is being achieved.

Performance Measure 3.1: Number of High Water Users vs Average Water Users Assisted

Annual program reporting provides the information necessary to determine the number of high water users compared to average water users. Under WRAP, high water use is defined as a households whose average consumption is 120 percent above the average when controlling for the number of people living in a household. Of the 27,609 households that have received assistance since the program's inception, 31.6 percent were reported as having high water use. The proportion of high water users who are renters compared to homeowners is approximately equal at 15 and 17 percent, respectively.

Exhibit 17. Number of High and Average Water Users, by Housing Status, March 1, 2016 through June 30, 2016

Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

As Wayne Metro serves the most households out of any WRAP service provider, it makes sense that it also serves the largest share of high water users. However, Wayne Metro does not report a greater proportion of high water users than WRAP overall. On average, high water users for Wayne Metro make up 32.6 percent of households served. MCA reports the highest proportion of households with high water use at 37.6 percent of households served. GCCARD has the lowest proportion of high water users with just 22

percent of households meeting this threshold. Additional examination of program reporting data illustrates the variability of high water use by community served, as shown in Exhibit 18.

Exhibit 18. Proportion of High and Average Water Users, by Housing Status, March 1, 2016 through June 30, 2020

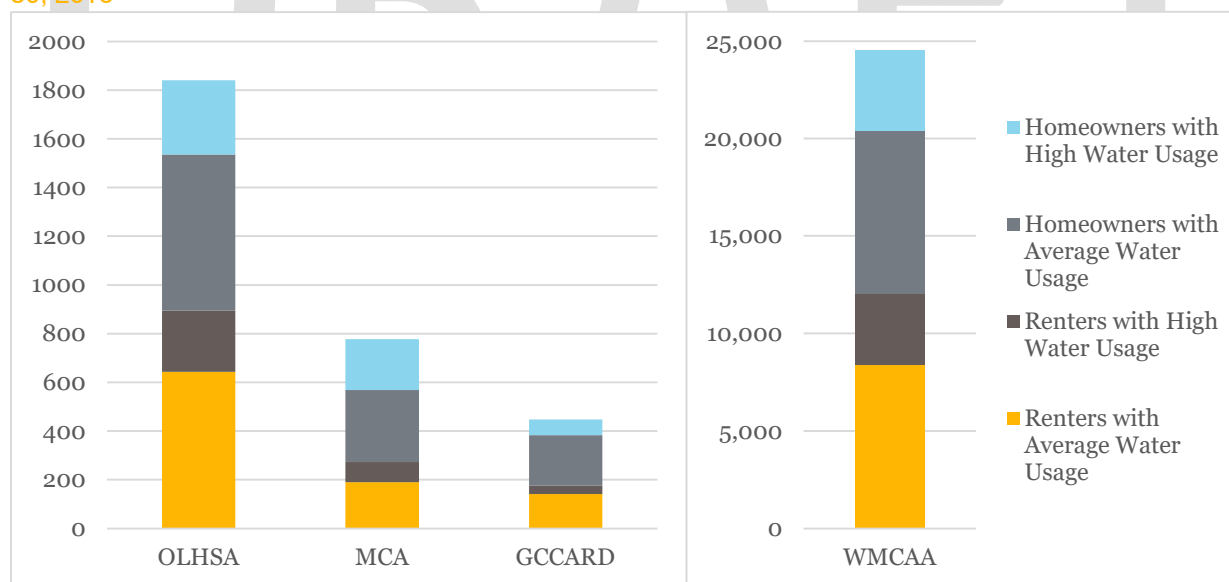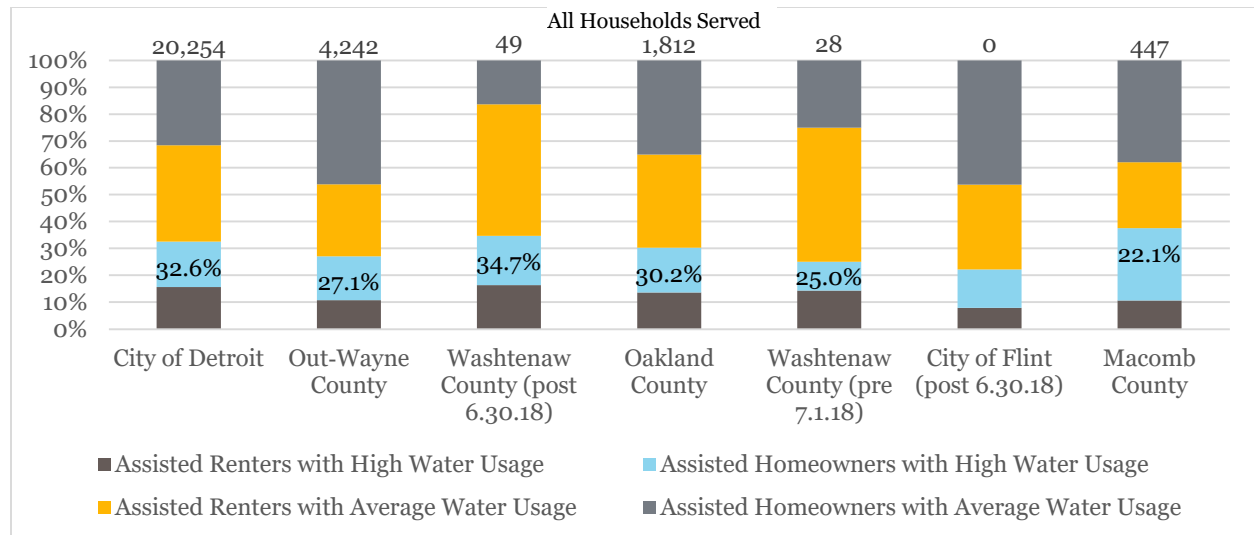Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Performance Measure 3.2: Number of Households that Turned Down vs Attended Conservation Classes

One aspect of WRAP's conservation assistance is providing education to households on behavioral changes that can help reduce water consumption. Service providers often provide conservation education using a variety of methods, such as in person home usage audits, flyers or other educational materials, and conservation classes including Wayne Metro's LIVE SMART Workshops. While the available data documents the number of households with high usage that receive referrals for services, information related to attendance at conservation classes is not recorded. Through direct communication with Wayne Metro, PSC has learned that conservation education is provided to all WRAP enrollees as part of overall wrap around services, but this still leaves questions about the function and impact of conservation classes. To successfully report on this performance measure, program administrators should document the number of conservation classes conducted and participation in these classes. Should GLWA wish to determine if these classes are impacting households' knowledge of conservation practices, efforts could be made to collect post participation surveys for all conservation classes. Feedback received from these surveys would help inform future conservation courses and educational plans.

Performance Measure 3.3: Number of Repairs Performed (including the Average Cost of Repairs per Household) and Impact on Bill Size and Timeliness of Payments

The third conservation performance measure includes three distinct components. In addition to the number of repairs performed and the associated cost, this measure seeks to determine whether repairs have impacted customers' bills and on-time bill payment. The first aspect of this performance measures is

relatively straightforward to report from the data provided. All of the owner-occupied households that were found to have high usage were referred for conservation audits and/ or minor repairs. During the period of March 1, 2016 through June 30, 2020, 4,711 households were referred through this process. Of these households 3,276 (69.5 percent) received a home usage audit and 2,014 (42.8 percent) received minor repairs. The program has provided an average of 505 households per year with minor repairs. The average number of households receiving repairs per year was 414 for Wayne Metro, 52 for OLHSA, and 31 for MCA. GCCARD only reported performing repairs in one year (2019-20) for a total of 29 repairs. The number of repairs per year has declined since the first two years of the program and was just under 400 per year in the July 2019-June 2020 program year. 82.2 percent of the households receiving minor repairs were within Wayne Metro's service territory. Annual household repairs are shown in Exhibit 19.

Exhibit 19. Households Receiving Minor Repairs, March 1, 2016 through June 30, 2020
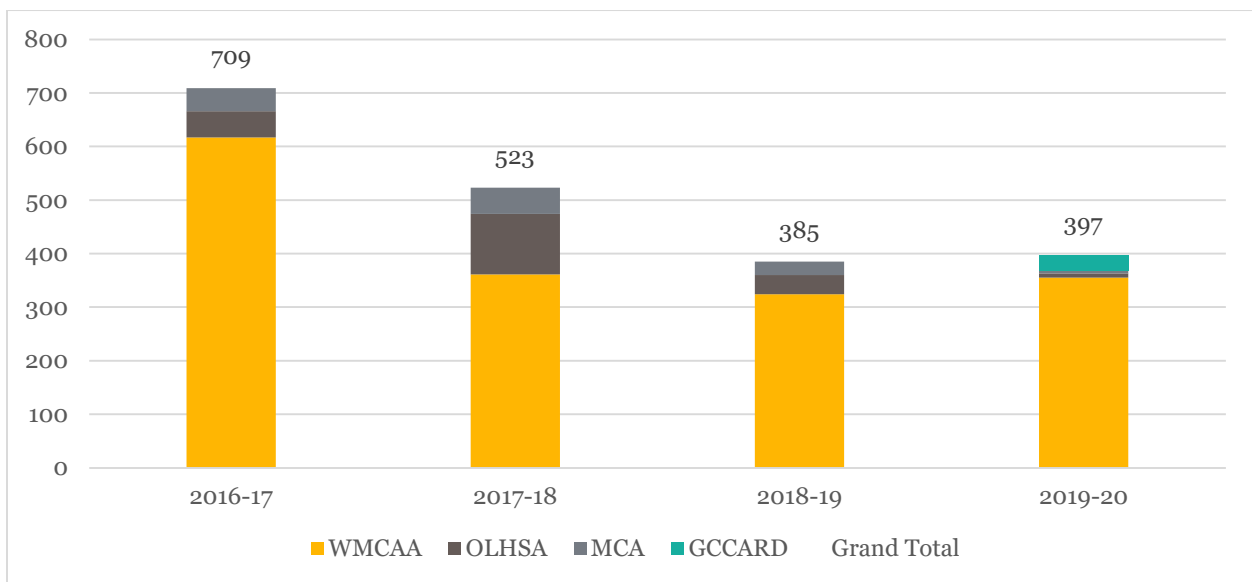
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Through January 2019, only owner-occupied households were eligible to receive conservation services through WRAP. The GLWA Board of Directors adopted a series of changes to WRAP in January 2019 including allowing renters that are responsible for paying their water utilities to access conservation funding. Program reporting provided through June 30, 2020 does not indicate whether households receiving conservation services are owner occupied or renter occupied. However, review of data shows that the number of households that received referrals for conservation services was equal to the number of homeowners that were identified as having high consumption, which could be interpreted as meaning all households that received home use audits and minor repairs were owner occupied. The latest program reporting for the period ending June 30, 2020 includes a new line item detailing funding for "Renter Conservation Supplies". In total $350,000 was provided to renter households, but this does not include the number of households served or an indication of how these services differ from those provided to homeowners. Future program reporting should differentiate between renters and homeowners when reporting the delivery of conservation services.

Utilizing the data provided, PSC was able to calculate the average cost per household for minor repairs and home usage audits. In line with the $1,000 per household cap on conservation services that was in effect until March 2020, the average combined conservation funding provided from March 1, 2016 through June 30, 2020 was $1,077.16 per household. In March 2020, GLWA's Board of Directors adopted changes to WRAP which increased the cap on conservation and plumbing repairs per household to an average of $1,500 with a cap of $2,000 (GLWA March 2020). The average cost of home usage audits was relatively consistent across service providers and averaged $483 per household. The exception to this is GCCARD which reports that home usage audits had an average cost of $983. As Wayne Metro is the sole provider of home usage audits it makes sense that there would be consistency across the entire population. Additional investigation would be required to determine what the cause of GCCARD's substantially higher cost for home audits. The average amount spent on conservation related repairs was $594. Again, the funding amounts were relatively consistent across the entire service area with GCCARD as the only outlier. Wayne Metro had the highest average repair costs at $618. A full comparison of conservation costs by service provider is provided in Exhibit 20.

Exhibit 20. Average Cost of Conservation Services, per Household, March 1, 2016 through June 30, 2020
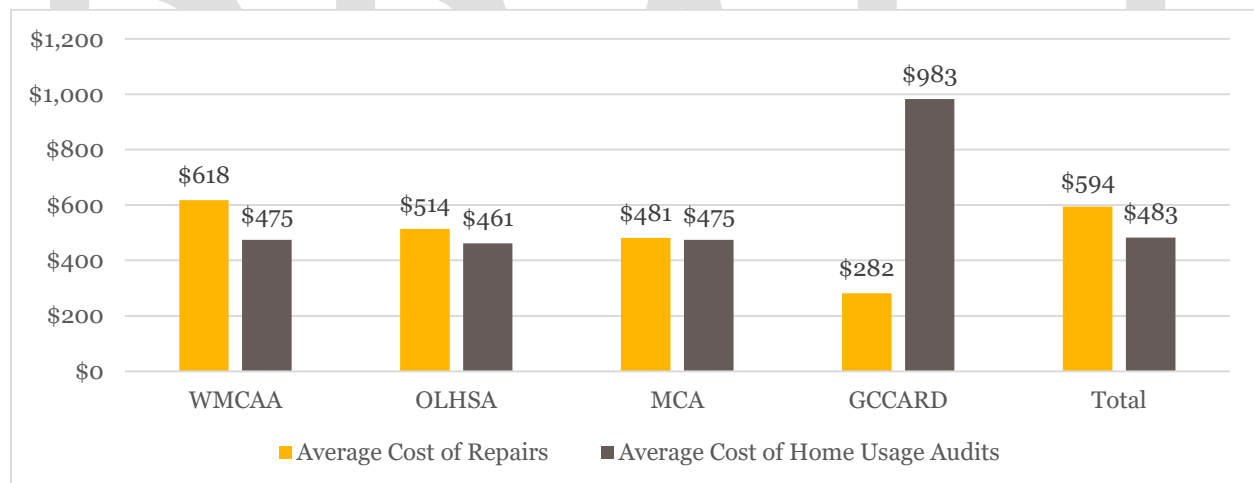
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

While the first two components of this performance measure were possible to report, the data for assessing whether these services have any impact on reducing customers' bills or promoting on time payments is not available. Similar to the customer satisfaction measures reported in performance measure 1.7, Wayne Metro has provided some relevant information to GLWA in periodic presentations. In a slide titled "2018 Water Conservation Impact" Wayne Metro shares that the average customer saved $420 per year on their water bill for a total of $293,160 in annual savings. This information is based on pre-post water bill sample analysis. Without the ability to examine these findings in further detail, it is not possible to validate these savings. As Wayne Metro is already conducting the relevant analysis to determine bill savings from conservation, PSC recommends that these data be provided to GLWA in annual program reports. Separate analysis conducted by DWSD reports that 76 percent of Detroit households that received conservation services were able to see a reduction in water consumption.

Additionally, there is no reporting for whether households that receive conservation services have more success keeping up with their monthly bills than households that didn't receive these services. Though

continued participation in the program is an indicator of on time bill payment. PSC recommends that Wayne Metro provide program completion rates for customers that have received conservation services and those that have not. This will allow comparison between the two populations and can be used to determine if further evaluation may be required.

Performance Measure 3.4: Location of Households with High Water Usage

Program reporting provides the number of households with high water usage by service provider and community served. For example, Wayne Metro provides service to the City of Detroit, Wayne County, and Washtenaw County.[4] This enables the location of households with high water usage to be reported at the community level, provided in Exhibit 21. While the data provided can demonstrate the number of households enrolled in WRAP with high water usage, it is not possible to report the total population of high water users across member partner communities. Without information related to the overall population of households with high usage, it is difficult to determine the overall need for conservation services. To effectively measure households with high usage would require working individually with member partner communities to review customer consumption data. This may prove administratively burdensome and, as such, more consideration should be given to the need for this information.

Exhibit 21. Location of Households with High Water Usage, March 1, 2016 through June 30, 2020
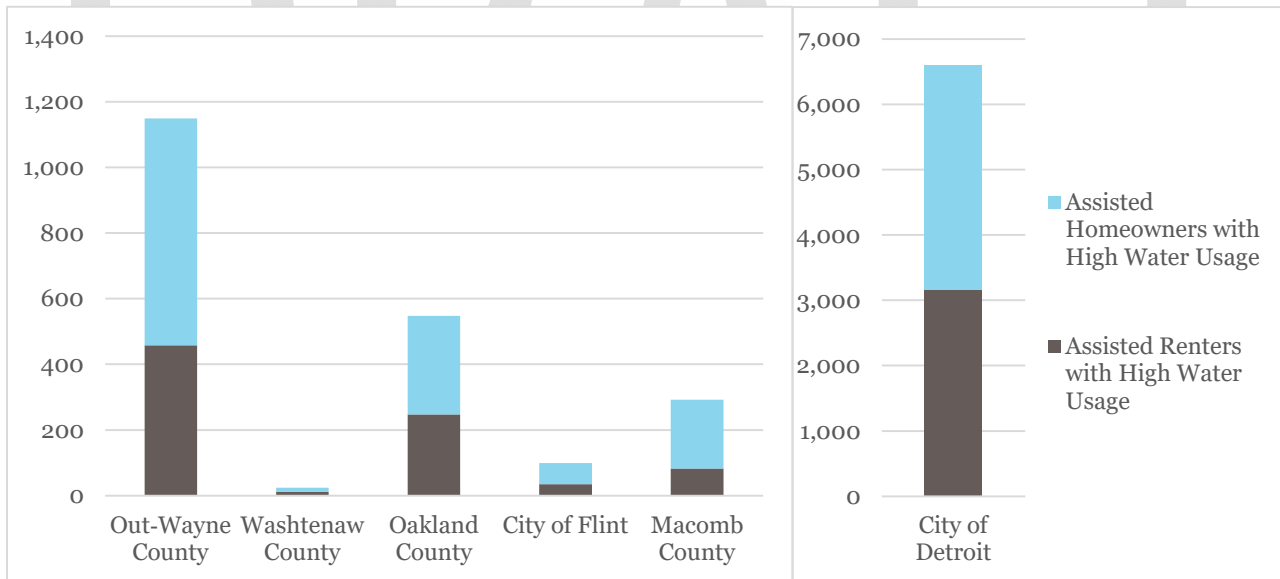
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Performance Measure 3.5: Number/Percentage of Households Receiving Both Forms of Assistance

The phrasing of performance measure 3.5 is somewhat ambiguous. PSC's interpretation, based on the context of other performance measures for goal three, is that "both forms of assistance" refers to customers that have completed conservation education classes and received other conservation related services. As mentioned above, PSC is unable to determine the level of participation in conservation classes

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[4] WMCAA has served Washtenaw County since June 30, 2018.

from data provided. It is possible to assess the number and percentage of households that have received conservation services in the form of home usage audits and minor repairs. The portion of annual program reporting pertaining to conservation services indicates that 27,609 households have received assistance since March 1, 2016. This number is higher than the total enrolled households for the same period indicating that customers may have received assistance and completed or been removed from the program. Of these households, 32 percent were identified as having high usage. Just over 53 percent of households with high usage were referred for additional conservation services (likely renters that were excluded until the program was modified in January 2019).

Goal Four: Promote Collaboration on Program Outreach to Consumers and the Public

Very little data is collected outlining engagement with other agencies or community organizations, and what engagement is reported only comes from one organization (Wayne Metro). Referrals from outside organizations is definitely a metric that should be better tracked if the program aims to better understand how it most effectively recruits new participants and increases visibility and awareness.

Performance Measure 4.1: Number of Agencies and Community Organizations Engaged

Wayne Metro reported engaging with three entities in each year of the program. PSC assumes these are the same organizations listed as providing supplemental assistance to WRAP—the City of Detroit, the Michigan Health Endowment Fund, and the Detroit Water and Sewerage Department Fund. As the program administrator, Wayne Metro also partnered with other community action agencies in southeast Michigan. From this data, it was unclear what Wayne Metro's specific engagement with other entities accomplished. If no other entities were engaged, then there appears to be an opportunity to strengthen partnerships in communities served to expand the program's reach.

Performance Measure 4.2: Number of Client Referrals from Regional Agencies and Community Organizations

The data to report the number of client referrals received is not provided in annual program reporting for WRAP. Though reporting does indicate that WRAP service providers engage with other community organizations in the form of supplemental program funding, it does not appear that additional efforts to quantify the impact partnerships have had on applications or enrollments. Leveraging community networks and strategic partnerships is an important success measure and will help to promote awareness and uptake of WRAP across GLWA's member partner communities.

Performance Measure 4.3: Effectiveness in Public and Consumer Outreach

Wayne Metro has identified that increasing awareness for WRAP among residents of member partner communities continues to be a challenge (Wayne Metro January 2019). Though this challenge has been stated and recommendations to expand outreach and marketing have been approved, there is limited data to effectively assess the impact of such efforts on public and consumer awareness. Funding for outreach and marketing activities was detailed in the most recent program summary report for March 1, 2016 through June 30, 2020. For GLWA to determine whether the $700,761 allocated for these purposes is having the desired impact, there needs to be a structure effort to define additional performance measures and reporting requirements.

Goal Five: Foster Collaboration to Advance Partnerships for Developing and Leveraging Funding Opportunities to Deliver Assistance

Ensuring collaboration and partnership in providing assistance continues to be an important goal for WRAP. Given the need for assistance outpaces the available funding, WRAP must leverage other efforts and sources of funding to successfully reach as many households as it can. The data provided in annual program reporting was mostly sufficient to determine the amount of supplemental funding and funding partnerships that have been leveraged over time. However, the reporting does not provide sufficient visibility into how WRAP service providers are able to build strong partnerships around water utility assistance.

Performance Measure 5.1: Number of Partner Agencies Providing Supplemental Funding/Assistance

Wayne Metro was the only organization that reported receiving supplemental funding/assistance from partner organizations. Wayne Metro provided supplemental funding support from Community Services Block Grant for the City of Detroit, the Michigan Health Endowment Fund, and the Detroit Water and Sewerage Department Fund. Combined these sources provided $3.5 million in assistance, as shown in Exhibit 22.

Performance Measure 5.2: Supplemental Funding Made Available

Exhibit 22. Supplemental Funding, March 1, 2016 through June 30, 2020

- $939,504.52 — CSBG WRAP - Detroit
- $240,896.00 — Michigan Health Endowment Fund (MHEF)
- $2,662,900.00 — Detroit Water and Sewerage Department (DWSD) Fund
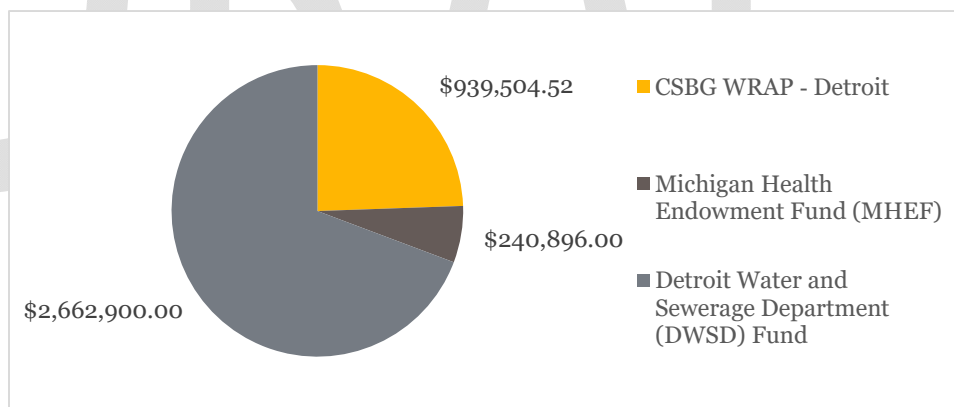
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

The amount of supplemental funding reported from year to year showed some variance. Initially $3.2 million was reported. Then in subsequent years the funding reported increased to $4.1 million before decreasing to $3.5 million by the June 30, 2020 report. It is unclear why the supplemental funding made available for WRAP participants decreased. While this information provides information about other direct funding sources used, more information could be provided as to how WRAP service providers are able to leverage other forms of assistance for households participating in WRAP. Currently it does not appear that service providers track whether WRAP enrolled households are receiving other forms of assistance.

Performance Measure 5.3: Program Participants Served Through Supplemental Funding

Wayne Metro was the only organization that served some of its program participants with supplemental funding. Wayne Metro served 4,171 participants from March 1, 2016 through June 30, 2020. Exhibit 23 shows, this number ranged from 3,773 participants in 2016-17 to 4,194 participants in 2017-18. There was a small decline in participants served using supplemental funding from June 2018 to June 2019. It is unclear what resulted in this decline.

Exhibit 23. Program Participants Served Through Supplemental Funding, March 1, 2016 through June 30, 2020
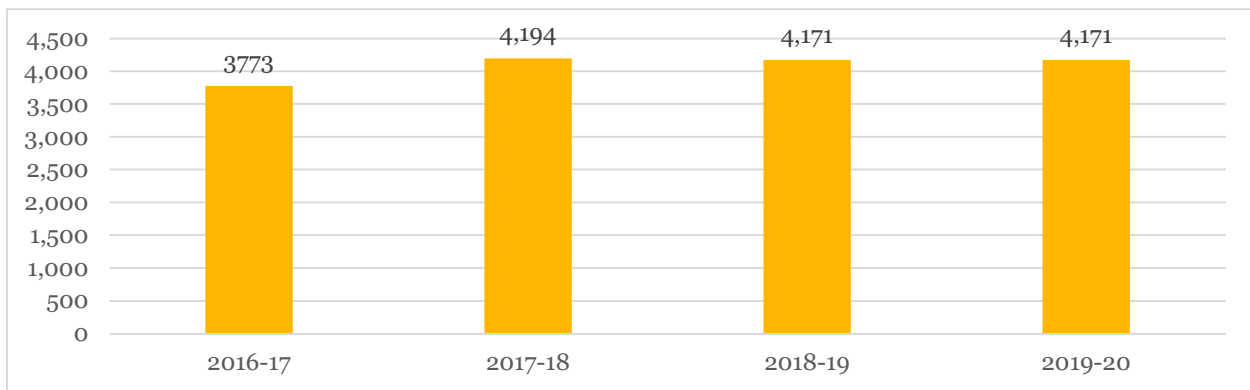
Source: Analysis of Annual WRAP Program Summaries provided by Wayne Metro

Performance Measure 5.4: Additional Forms of Assistance Provided via Supplemental Funding (e.g., home water audits, conservation kits, leak repaired)

The data provided does not detail what types of services were provided via supplemental funding.

Data Discussion and Conclusions

Reviewing WRAP design documentation and the above analysis of available program data revealed three key takeaways: data related to performance measures are not consistently collected and reported; performance measures are primarily focused on indicators related to the process of administering the program instead of the desired outcomes and impacts of the program; and without designated benchmarks or goals for performance measures, it is difficult to assess the success of WRAP.

Data Collection and Reporting

As noted in the analysis, there are additional performance measures that were identified in WRAP design documentation that are not currently monitored or reported on as data is not collected and/or reported in relation to these measures to GLWA, though per the program design report, each participating organization is required to report on all identified performance measures, as well as financial performance of their program, on a no less than quarterly basis. While much of the financial information appears to be reported consistently, as demonstrated in the analysis above, reporting on specific performance measures is not currently happening. Additionally, the current format for program reporting

which provides all program summary data as cumulative since March 1, 2016 makes it difficult to compare annual data without performing additional calculations.

Recommendation

Consistent and regular data collection as part of a continuous monitoring and evaluation of a program can help lead to quality improvement and compliance with program goals and objectives, ensuring that WRAP is accountable to its goals and objectives, and demonstrates success. To improve program monitoring going forward, PSC recommends that GLWA require program reporting be framed in terms of specified performance measures. There is also an opportunity to review the current performance measures and update them to ensure they support the program's objectives. In cases where data is not currently being collected, the program administrator should work to identify the feasibility of collecting and reporting desired data and where possible update data reporting processes to reflect the requisite data. PSC understands the need to limit the administrative burden that program reporting places on available funding and staff resources, as such updated WRAP reporting requirements should be reviewed by GLWA and the program administrator before being put into effect.

Moving forward with WRAP, we encourage the program administrator, stakeholders, funders, and participating communities to consider data collection efforts using the Credible, Actionable, Responsible, and Transportable (CART) data collection principles as a guide, specifically focusing on the "actionable" and "responsible" principles.[5] The actionable principle encourages organizations to only collect data that they will use or act upon, while the responsible principle ensures the benefits of data collection outweigh the costs. Technology and other resources have made data collection, storage, and management easier and more cost-effective than ever before. While this increased access to data is a contributor to helping organizations make data-driven decisions, it can also lead to an overwhelming amount of data that can hinder effective analysis and reporting, leading to poor decision-making or decision-making that does not factor in the data altogether. By weighing the costs and benefits of data collection activities and intentionally limiting data collection to performance measures that can be acted upon, organizations can ensure that the resources they are putting into data collection and reporting are efficient and useful.

Process vs. Outcome Measures

Many of the identified performance measures are process-related, meaning they focus on evaluating and measuring the program's operations and service delivery. While these types of measures are important and helpful in demonstrating fidelity to the program's model, they do not necessarily show the effectiveness and the impacts the program has on the communities and households it serves.

Recommendation

By including performance measures related to the desired outcomes of the program in the data collection and reporting cycle, WRAP can begin to understand the impact that the program is having on the participating communities and households and communicate those results with potential funders, communities, and other stakeholders as a means to encourage and secure future participation and funding for the program long term.

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[5] Cart Principles. Innovations for Poverty Action. 2018. https://www.poverty-action.org/right-fit-evidence/principles#:~:text=Collect%20high%20quality%20data%20and%20analyze%20the%20data%20accurately&text=For%20data%20to%20measure%20accurately,organizations%20are%20seeking%20to%20measure.

Performance Benchmarks

Without identified benchmarks, it is difficult to know whether the program is operating as intended and leading to the outcomes and impacts desired. For example, without identifying a desired goal for number of households assisted per year, the program administrator, stakeholders, funders, and participating communities cannot know whether the actual reported number of households served is above or below (i.e. is the program achieving its desired goal), and if modifications to service delivery or communications and outreach are working or not working.

Recommendation

To avoid this and ensure that WRAP is functioning as planned and achieving its desired outcomes, benchmarks should be identified for each of the performance measures. This could happen at the individual participating organization level to account for differences in relative population sizes, community needs, and available resources for each organization or at a more macro-level for WRAP overall.

Process Evaluation

Expanding on the review of annual program reporting data and outcomes assessment, PSC developed a process evaluation framework that enabled further review of WRAP. An integral part of this evaluation is understanding how program success is defined and identifying opportunities for improving program delivery. To fully capture the diversity of stakeholders that have had a role in WRAP since its inception, PSC's developed a model of direct engagement with key stakeholders to capture their feedback. Working with GLWA, PSC identified the following people and groups to engage:

- GLWA's Board of Directors,
- The CEO of GLWA,
- The Director of the DWSD,
- Member partner communities,
- Community action agencies responsible for program administration, and
- Other stakeholders with knowledge of the program.

PSC conducted a series of focus group discussions and one on one interviews with stakeholders over the course of three months (August to October 2020). The following analysis provides findings from these interactions, program successes, and recommendations for improving WRAP.

Program Successes

WRAP provides essential support to households in need across southeast Michigan and stakeholders overwhelmingly support the program. Though much of the conversations with stakeholders focused on how to improve the program, there were a number of program successes identified that are important to document.

- Member communities appreciate that WRAP provides and incentive structure that rewards customers for paying their bill on time as this supports long term self-sufficiency.
- Stakeholders highlighted that the combination of monthly bill payment, arrearage assistance, and conservation is strength of the program as helps address several factors affecting affordability.

- Program administrators expressed that the income and eligibility determination requirements for WRAP are flexible and make enrolling households easy.
- Stakeholders noted that the program doesn't require customers to wait until they are in crisis to seek help because customers can enroll in the program before they are at risk of being disconnected or already disconnected. This enables households seek assistance earlier and avoid potential fees or penalties.
- There was wide praise expressed for GLWA's willingness to introduce changes to the program over the years to make the program more accessible. Specifically, stakeholders highlighted the following successes;

  - Raising income eligibility threshold from to 200 percent FPL.
  - Allowing renters to participate in the program and received conservation services if they can prove the water bill is in their name.
  - Increasing the cap on conservation spending from $1,000 to $2,000 as long as the average payment does not exceed $1,500.
  - Enabling low-income seniors and disabled customers to participate in the program for a longer period of time.

Opportunities for Improvement

Program Administration

WRAP is administered by Wayne Metro with support in surrounding counties from partner community action agencies. This partnership has been in place since the program's inception. As the primary program administrator, Wayne Metro is responsible for the day to day management of the program, including coordinating with partner organizations, scheduling all enrollment appointments, delivering conservation services, directly serving residents in Wayne and Washtenaw Counties, engaging with member communities, marketing and outreach activities, and behind the scenes program operations. PSC was not seeking specific feedback on the performance of Wayne Metro or its partner organizations, instead the evaluation was focused on whether current program administration could be improved to better serve customers' needs.

Leveraging Other Forms of Assistance

Many stakeholders see community action agencies as an ideal partner for WRAP as these organizations have a well-established presence in communities they serve and they already provide access to other programs for income qualified residents (e.g. housing, food, energy, and other types of assistance offerings). Stakeholders claimed that WRAP alone cannot meet the need of customers in member partner communities as water affordability continues to be a challenge. Because of the existing role community action agencies play they are able to provide wrap around services to residents and potentially leverage other resources that can address other household needs. Despite community action agencies position to leverage other forms of assistance, stakeholders reflected that there is limited reporting that demonstrates the extent that customers that have enrolled in WRAP are receiving other forms of assistance and/ or wrap around services. Additionally, stakeholders questioned whether there is more that can be done to leverage other forms of assistance from corporate partners or through fundraising efforts.

Recommendation

GLWA should consult with program administrators to assess the ability to provide data on the number of households that received additional forms of assistance while enrolled in WRAP. Documentation could be limited to indicating the type of wrap around services provided and the number of other assistance programs that a customer was able to access through their interactions with a community action agency. This data can be used to determine whether customers receiving assistance through WRAP are dealing with extenuating circumstances or if the problem is limited to water bills.

GLWA and the program administrator should partner in efforts to engage other potential funding partners to support water assistance needs through southeast Michigan. These efforts should highlight the success of the program to date and demonstrate the potential impact corporate, philanthropic, or public sector funding support can have for households in need.

Program Adoption and Uptake

A consistent concern raised by stakeholders was that WRAP has seen limited uptake in Oakland and Macomb Counties. On the surface it makes sense that the greatest uptake for the program would occur in Wayne County which has the highest poverty rate out of the counties served by GLWA. At 23.1 percent Wayne County's poverty rate is 12 percent higher than Macomb County and 14 percent higher than Oakland County (U.S. Census Bureau December 2019). Though the need in Oakland and Macomb Counties may not be as pronounced as Wayne or Genesee Counties, stakeholders reflected that program administrators have not done enough to get the word out about the program and drive participation.

One of the concerns highlighted was that the number to call for WRAP enrollment appointments has a 313 area code, which was seen as a barrier for residents from outside Wayne County. Additionally, several stakeholders expressed that the current administrative structure does not provide local service providers the ability to take on roles that would be better suited to a local partner, such as serving as the liaison with member partner communities and playing a direct role in outreach and engagement with potential program participants. Stakeholders stressed that a strength of the community action agency partnership is that it can leverage specific strengths across the service territory but there is currently limited ability to take on these roles that have previously been performed by Wayne Metro.

Recommendation

GLWA should consider restructuring the community action agency partnership model to allow local service providers to play a larger role in the administration of WRAP for the communities they serve. This could include allowing service providers to perform enrollments without utilizing the centralized scheduling service, GLWA contracting with entities in each county completing removing the role of a centralized third-party program administrator, formalizing the role of member partner community liaison, partnering to provide conservation services, and providing greater local control over program marketing and outreach. Expanding the services provided by local service providers will require shifting administrative funding to cover the increased costs, but there is not likely to be a substantial increase in program administration costs due to such realignment. This recommendation does not rule out the potential benefits of having a single entity as the primary program administrator and instead suggests more localized administration could help drive the desired program uptake in underperforming jurisdictions.

Program Communication and Marketing

Despite WRAP having served over 20,000 households in the past four years, stakeholders report that overall awareness of the program remains low. This problem is especially pronounced outside of Wayne County where stakeholders cite insufficient marketing and outreach as a driver behind program participation being consistently low. Prior to July 2019, it does not appear that outreach and marketing activities for WRAP received dedicated funding. Beginning in the annual program report ending June 30, 2020, $700,000 of outreach and marketing funds were reported. Stakeholders did not address whether the sudden influx of funding has improved program awareness or led to a dramatic change in outreach strategies, however, stakeholders made clear that a one size fits all approach to marketing and outreach would not suffice. Stakeholders emphasized the need for intentional marketing that can be tailored to individual communities.

Recommendation
Stakeholders reflected a consistent desire to see program awareness improve in all communities served by WRAP. To promote increased awareness, GLWA should continue to support funding for direct outreach and marketing. GLWA should also consider the benefit of having local community action agencies lead marketing and outreach activities within their service territories and ensure efforts are coordinated with member partner communities and other local entities to amplify reach.

Enhance Program Oversight

The need for enhanced program reporting and accountability for WRAP was expressed by several stakeholders. Currently program reporting is provided by Wayne Metro to GLWA on a quarterly basis with annual reporting provided at the close of each fiscal year. This information is not disseminated widely, nor would it be particularly useful to most stakeholders in its current format. As detailed in the outcomes assessment above, program reporting does not directly address the program's established goals and performance measures. Additionally, stakeholders cited that there are periodic issues with enforcement of program rules that may necessitate ongoing program monitoring. Though GLWA oversees WRAP, GLWA staff play a limited role in supporting the program's day to day administration.

Recommendation
GLWA should consider expanding its capability to take a more active oversight role with WRAP. Given the programs size and potential for growth, there is an ongoing need for staff to ensure the program operates effectively. Potential areas where GLWA could take on more responsibility include; recruiting new member communities to the program, troubleshooting data and reporting issues, providing ongoing program performance monitoring, developing stronger internal processes for reporting and oversight, and overseeing the implementation of program changes.

Program Design

Continuous improvement of WRAP should continue to be a priority for GLWA. GLWA and Wayne Metro have consistently looked for ways to improve the design and operation of WRAP over the past four years. As discussed elsewhere in this report, many of these changes have resulted in greater access to assistance services for households in need. Stakeholders raised several potential program design considerations during this process that should be explored.

Reaching Customers with the Greatest Need

For many households, monthly bill payment assistance can help make a water bill more affordable, but this only works if that household has enough resources to pay the remainder of their bill. WRAP provides a fixed $25 per month for up to two years which means that customers can still be responsible for upwards of $80 a month in communities with the highest water rates.[6] Depending on a household's income the monthly assistance amount might not be enough to make the difference. Stakeholders consistently expressed that WRAP on its own cannot ensure long term affordability and that the program doesn't work for households that are in the greatest need.

Recommendation

GLWA has already expanded program eligibility to help low-income seniors and disabled persons to remain in the program indefinitely. This change will go a long way in helping customers with chronic need and/ or fixed incomes by providing ongoing support. Just like program accommodations were necessary to meet the needs of senior and disabled populations, WRAP as it is currently designed may not work for the lowest income households for whom monthly water bills can represent a substantial burden. In its current form WRAP does not allow for the level of benefit provided to customers to be income or needs based. GLWA should begin evaluating the feasibility of introducing an income or needs based payment amount.

Recognizing this program design change could present legal, fiscal, and programmatic barriers, PSC recommends that GLWA begin collecting data necessary to build the business case for this change. Current program reporting does not track program success by income level, so it is not possible to determine whether households with the lowest incomes have different success rates than other program participants. At minimum, GLWA should require program reporting to detail the success rates for customers at different income levels. This information can be provided in an aggregated format to ensure no identifying information is shared. By expanding reporting requirements to include this information, GLWA can begin to determine if action is warranted.

This potential change will introduce an additional programmatic element that could create additional administrative burden for program administrators and member partner communities. The current program is administratively efficient from the perspective that each customer's monthly payment amount is the same. Introducing a benefit structure where there are several different benefit amounts or each customer's assistance payment is different will likely face resistance. Prior to the introduction of a revised benefit structure, GLWA should consult with program administrators, member communities, and other stakeholders to assess the receptiveness to a significant program design change.

Addressing Immediate Crisis

WRAP provides households with monthly bill payment assistance to help build a pattern of successful, on-time payment and promote self-sufficiency. This program structure is well suited to many customers but may not be ideal for households that present in need of short-term assistance in the case of an immediate crisis. Unlike in energy assistance where there are a number of different programs that customers can access depending on their circumstances, WRAP is the primary, if not sole, source of assistance funding for many customers. As such, WRAP is put in a position of needing to respond to a variety of different circumstances. Stakeholder noted that the absence of other funding sources for water assistance makes it

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[6] Based on the average bill for a City of Flint resident of approximately $110 dollars per month.

difficult to serve customers who may not need to enroll in a two-year program but could use temporary support.

Recommendation

GLWA should consider whether WRAP assistance can be made available to households that need short-term assistance or crisis intervention. This option could be available to households that meet the program's eligibility requirements and can demonstrate a history of on-time payment but do not have a high arrearage balance and self-identify as needing short term relief. In these circumstances, client intake specialists could be empowered to lay out available assistance options and allow the customer to select the option that best fits their needs.

Maintaining Administrative Efficiency

The design of WRAP must take into consideration the reality that up to 105 communities will be responsible for administering payments on behalf of enrolled households and many communities' water departments have limited staff capacity to take on additional duties. Stakeholders consistently cited the administrative burden placed on member partner communities as the main obstacle for getting communities to opt-in to the program. While more than 70 communities are already participating in the program, increasing administrative requirements could potentially jeopardize ongoing engagement.

Recommendation

As GLWA considers future program changes, proposed changes should be assessed to determine the anticipated impact on member communities. Where possible, GLWA should work to minimize the administrative workload required of member communities. If proposed programmatic changes would result in increased administrative burden for communities, GLWA could consider piloting these changes with select communities to better streamline processes and identify challenges before changes are rolled out for all communities. Additionally, GLWA and program administrators could consider providing ongoing technical support to communities to support the deployment of programmatic changes.

Establishing a Direct Service Option

Improving outreach to member partner communities and prioritizing administrative efficiency may not be enough to get all 105 communities to opt-in to WRAP. As such, stakeholders expressed an interest in exploring assistance delivery models that would allow all eligible households receive assistance, even in cases where a member partner community has not opted in.

Recommendation

The challenge with a direct services model is that without administrative cooperation from a community's water department the current program design doesn't work. WRAP requires coordination between the program administrator and water utility to verify households continue to make required payments and apply assistance funds to customer accounts. GLWA should evaluate models for an effective and efficient direct service option for eligible customers. A direct service option should avoid or minimize interactions with non-participating communities, while upholding the program's established goals. One way to potentially address this obstacle would be to allow customers to, in essence, self-certify by providing confirmation that they have paid their utility bill on time. Then the program administrator could reimburse the customer or make a payment on their behalf to the local water utility. These work arounds, while possible could create additional challenges if implemented at scale considering individual checks would need to be processed instead.

Serving Customers with High Arrearages

Households enrolled in WRAP who make their bill payments on time each month are eligible to receive up to $700 in arrearage assistance per year to pay down past due balances. Should a household complete two years of WRAP and receive the maximum assistance benefit per year, the household would receive $1,400 in arrearage assistance in addition to $600 in monthly bill payment assistance. Though this benefit would be sufficient to erase the arrearages for over 70 percent of enrolled households, there are still households that could emerge from the program after two years and still owe an arrearage balance. Stakeholders commented that this reality for some households raises the question of whether households should be allowed to complete the program when they still have a balance on their account.

Recommendation

There are several potential ways to address issues of customers with high arrearage balances. One possible solution would be to allow an individual household to receive more than $1,000 per year in combined assistance. This change could be structured similar to the recent change in the cap for conservation funds, allowing for individual customers to receive a higher benefit as long as the average benefit amount provided does not exceed $1,000. A second option would be to allow customers that have an arrearage balance at the end of the two-year commitment to enroll for a third year. This solution could support those households with more than $2,000 in arrears. In cases where arrears exceed $2,000, GLWA could consider providing additional assistance dollars through WRAP, however these balances might be better suited to being written off by the water utility. This would recognize the likely very low probability that a customer with such high arrears balance would be able to repay the amount and allow limited assistance funding to be used to support other households in need.

Simplify Eligibility Determination

Overall, stakeholders expressed that WRAP's eligibility requirements are flexible and not overly burdensome. Unlike other forms of assistance which have statutory requirements for eligibility that cannot be easily modified, WRAP is governed by GLWA Board of Directors who have historically been receptive to simplifying and expanding program eligibility. Stakeholders suggested that GLWA could further ease the burden of eligibility determination for households by adopting a broad-based categorical eligibility policy. This policy would allow a customer that already receives another form of income qualified assistance such as Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Low-income Home Energy Assistance Program (LIHEAP) to automatically qualify for WRAP assistance.

Recommendation

Given that GLWA has broad discretion to update eligibility requirements this policy could be designed to include any number of income-based programs. GLWA should consider the feasibility of allowing broad based categorical eligibility for WRAP.

Prioritize Direct Conservation Investments and Repairs

Conservations services are integral to WRAP's goal of promoting self-sufficiency for participating households because these measures can help to reduce water consumption and in turn lower bills. Funding for conservation is currently used to provide home usage audits and minor home repairs. On average, 45 percent of conservation funding, or $483 per household, is spent on audits. Stakeholders raised concern about the cost of audits and whether these services are actually having an impact on customer consumption. Current reporting does not provide detailed analysis for the savings achieved

through conservation measures and it is not possible to compare savings for households that received and audit to households that received an audit in addition to minor repairs. Stakeholders suggested that even in households that are able to demonstrate a reduction in consumption the payback period for conservation services is too long.

Recommendation

GLWA should work with program administrators and member partner communities to assess the impact of the conservation services currently being provided through WRAP with the goal of differentiating between audits and repairs. Based on this analysis, GLWA can develop a strategy to realign water conservation funding to support measures that can provide the highest return on investment for customers. If as suggested by stakeholders, home usage audits are not as effective at reducing household consumption then this funding should be dedicated to measure that can demonstrate higher impact on consumption. Additional research should be conducted to determine the types of water conservation measures that are deployable at scale and have proven impact on savings. Such an approach could potentially enable WRAP to purchase equipment directly benefitting from economies of scale. Stakeholders highlighted DWSD's toilet replacement program as an example of an effective and proven conservation strategy that can be deployed at scale. While the general consensus was to focus conservation services on repairs and upgrading fixtures, stakeholders added that a focus on conservation education and behavioral change should be maintained.

GLWA should also consider how WRAP can leverage other forms of assistance to support the program's conservation goals. The state of Michigan has recently announced funding for low-income households available through the end of 2020. This program is being administered through community action agencies and should be used to complement WRAP services. While this funding is temporary, it provides an example of how WRAP can utilize its existing processes and demonstrate success to leverage other funding sources.

Other Challenges

Property Tax Loophole

Stakeholders identified two primary barriers to getting member partner communities engaged in WRAP. The biggest obstacle was the administrative requirements for operating the program. The other challenge cited was communities' ability to transfer unpaid water bills to property taxes. From the community perspective this function is administratively efficient and effective as unpaid taxes result in a municipal lien against the property that can be collected. From the perspective of WRAP, this option may reduce how communities perceive the need for assistance within their customer base and contribute to lower participation rates. In addition, households that cannot pay water bills could face further financial impacts as a result and even risk losing their property or being evicted (Pierce October 2020). In recognition of the downstream challenges this creates, some communities have halted the practice of transferring past due utilities to property tax rolls.

Recommendation

It may not be GLWA's role to try to change communities longstanding practice of transferring past due utility bills to property tax rolls, however GLWA and program administrators can work to provide communities with an understanding of the potential downside for households this practice presents. WRAP can provide meaningful assistance to households in need and more needs to be done to help

communities recognize that helping customers reduce their past due balances by building a track record of on time payment can be a long term benefit.

Quantifying Eligible Populations

Stakeholders noted that there is a need to determine how many households are eligible for WRAP. In some communities there is a sense that there may not be a lot of need for WRAP and this explains the limited adoption. This topic was also raised in relation to measuring the programs impact as a proportion of need to determine whether communities are underserved.

Recommendation

Census data can provide necessary information to quantify the number of people at different income levels and can be broken down to provide information for each member partner community. GLWA should work to collect this information as a way to begin quantifying the need across its service territory. This information can be used to recruit non-participating communities by helping to demonstrate the population that may be eligible for assistance. Also, this data can facilitate the development of community specific goals related to assistance provided. PSC has collected some of this information which is provided in Appendix C.

Increasing Program Funding

A consistent theme that emerged from discussions with stakeholders was that the current WRAP funding is not enough to meet the need in many communities. Though stakeholders generally found the program to be successful, communities such as Flint and Detroit have many more customers that could potentially benefit from the program if funding were increased. Efforts to increase the amount of funding allocated to the program have been ongoing in recent years. In early 2020, GLWA's Board of Directors reviewed a proposal that would double the program's funding. While this proposal was not adopted a modified version of the proposal that would allow the city of Detroit to increase the amount of funding it provides to the program was approved.

Recommendation

Before additional funding is added to the program, participation rates in Oakland and Macomb Counties will likely need to increase. Adding new revenues to the program when the current funding allocation is not being utilized will likely face heavy scrutiny, just as with the proposal earlier this year. GLWA should strive to establish the business case for new revenues by working with program administrators to demonstrate the need for assistance funding in every member partner community and improve enrollment numbers.

Conclusion

PSC has provided a number of recommended changes for GLWA to consider to improve the delivery, oversight and administration of WRAP. These changes change from simple administrative changes to decision that GLWA's Board of Directors will need to consider. The program already has a strong foundation, and through the reissuance of Request for Proposals for WRAP program administrator, GLWA is presented with the opportunity to build upon that foundation.

Appendix A. GLWA Member Partner Communities

County	Member Partner	Option #1	Option #2	Option #3	In Progress	No Response	Not Opted In
Wayne	Allen Park	X					
Wayne	Belleville						X
Wayne	Brownstown Township	X					
Wayne	Canton Township	X					
Wayne	Dearborn	X					
Wayne	Dearborn Heights	X					
Wayne	Detroit	X					
Wayne	Ecorse	X					
Wayne	Flat Rock	X					
Wayne	Garden City	X					
Wayne	Gibraltar		X				
Wayne	Grosse Ile						X
Wayne	Grosse Pointe						X
Wayne	Grosse Pointe Farms						X
Wayne	Grosse Pointe Park						X
Wayne	Grosse Pointe Shores	X					
Wayne	Grosse Pointe Woods					X	
Wayne	Hamtramck	X					
Wayne	Harper Woods		X				
Wayne	Huron Township						X
Wayne	Inkster		X				
Wayne	Lincoln Park		X				
Wayne	Livonia	X					
Wayne	Melvindale	X					
Wayne	Northville	X					
Wayne	Northville Township					X	
Wayne	Plymouth		X				
Wayne	Plymouth Township						X
Wayne	Redford Township	X					
Wayne	River Rouge	X					
Wayne	Riverview						X
Wayne	Rockwood						X
Wayne	Romulus		X				
Wayne	Southgate	X					
Wayne	Sumpter Township						X
Wayne	Taylor		X				
Wayne	Trenton	X					
Wayne	Van Buren Township	X					
Wayne	Wayne	X					

County	Municipality	1	2	3	4	5
Wayne	Westland	X				
Wayne	Woodhaven		X			
Oakland	Auburn Hills				X	
Oakland	Berkley	X				
Oakland	Beverly Hills	X				
Oakland	Bingham Farms	X				
Oakland	Birmingham	X				
Oakland	Bloomfield Hills	X				
Oakland	Bloomfield Township					X
Oakland	Clawson	X				
Oakland	Commerce Township	X				
Oakland	Farmington	X				
Oakland	Farmington Hills	X				
Oakland	Ferndale	X				
Oakland	Hazel Park		X			
Oakland	Huntington Woods	X				
Oakland	Keego Harbor	X				
Oakland	Lake Orion	X				
Oakland	Lathrup Village	X				
Oakland	Madison Heights	X				
Oakland	Novi					X
Oakland	Oak Park		X			
Oakland	Orchard Lake	X				
Oakland	Orion Township	X				
Oakland	Oxford	X				
Oakland	Pleasant Ridge	X				
Oakland	Pontiac	X				
Oakland	Rochester Hills					X
Oakland	Royal Oak	X				
Oakland	Royal Oak Township	X				
Oakland	Southfield	X				
Oakland	Sylvan Lake					X
Oakland	Troy				X	
Oakland	Walled Lake			X		
Oakland	Waterford Township			X		
Oakland	West Bloomfield Twp.					
Oakland	Wixom					
Macomb	Centerline	X				
Macomb	Chesterfield Township	X				
Macomb	Clinton Township		X			
Macomb	Eastpointe	X				
Macomb	Fraser	X				
Macomb	Harrison Township			X		

County	Community				
Macomb	Lenox Township			X	
Macomb	Macomb Township	X			
Macomb	New Haven	X			
Macomb	Roseville				X
Macomb	Shelby Township	X			
Macomb	St. Clair Shores	X			
Macomb	Sterling Heights	X			
Macomb	Utica	X			
Macomb	Warren	X			
Macomb	Washington Township		X		
Washtenaw	Augusta Township	X			
Washtenaw	Pittsfield Township	X			
Washtenaw	Superior Township	X			
Washtenaw	Ypsilanti	X			
Washtenaw	Ypsilanti Township	X			
Lapeer	Almont		X		
Lapeer	Imlay City				X
Lapeer	Lapeer	X			
Genesee	Flint	X			
St. Clair	Burtchville Twp.				X
Monroe	Ash Township	X			
Monroe	Berlin Township				X
Monroe	South Rockwood				X

Appendix B. 2015 Program Performance Measures

Goal 1: Assist low-income individuals and families with their water and sewer bills;

- Number of completed applications
- Number of applicants not eligible for participation
- Number of households assisted
- Amount ($) of assistance provided total and average per household
- Number of payments that meet or exceed the estimates provided
- Number of repeat applicants / participants
- Randomized client satisfaction surveys
- Application and payment processing timelines

Goal 2: Avoid water utility disconnection and reduce account arrearages;

- Number of shutoffs avoided
- Amount of arrearages paid (eliminated)
- Amount of arrearages paid (total and average)

Goal 3: Assist clients in increasing self-sufficiency, in part through the provision of water conservation measures;

- The number of high water users vs. average water users who were assisted
- The number of households that turned down vs. attended conservation classes
- The number of repairs performed (include the average cost of repairs per household) and impact on bill size and timeliness of payments
- Location of households with high water usage
- Number/percentage of households receiving both forms of assistance

Goal 4: Promote collaboration on program outreach to consumers and the public; and

- Number of agencies and community organizations engaged
- Number of client referrals from regional agencies and community organizations
- WRAP effectiveness in public and consumer outreach/education will be measured by surveying agencies and community organizations to assess the effectiveness of communication strategies and the extent of regional participation/regional impact.

Goal 5: Foster collaboration to advance partnerships for developing and leveraging funding opportunities to deliver assistance.

- Number of partner agencies providing supplemental funding / assistance
- Supplemental funding made available
- Program participants served through supplemental funding
- Additional Forms of Assistance provided via supplemental funding (e.g. home water audits, conservation kits, leaks repaired)

Appendix C. Member Partner Communities Income Eligible Population

Exhibit C.1. Poverty Ratios for All Individuals for Whom Poverty Status is Determined, Participating Member Partner Communities
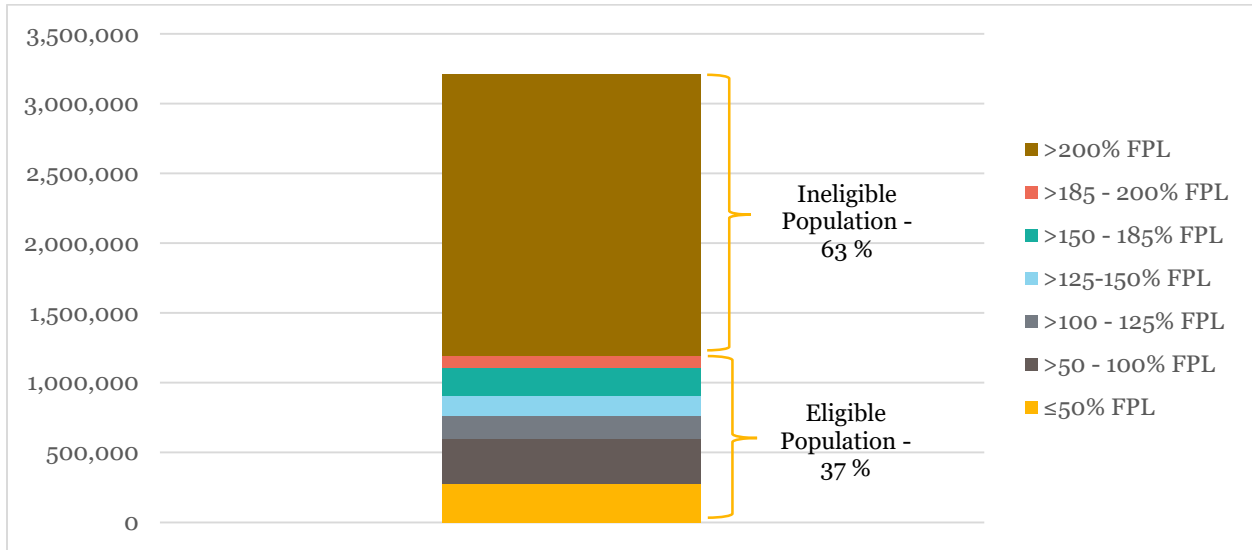
Source: U.S. Census Bureau. December 19, 2020. American Community Survey 2014-2018 5-Year Estimates. "Ratio of Income to Poverty Level in the Past 12 Months". https://data.census.gov/cedsci/

Exhibit C.1. Poverty Ratios for All Individuals for Whom Poverty Status is Determined, Non-participating Member Partner Communities
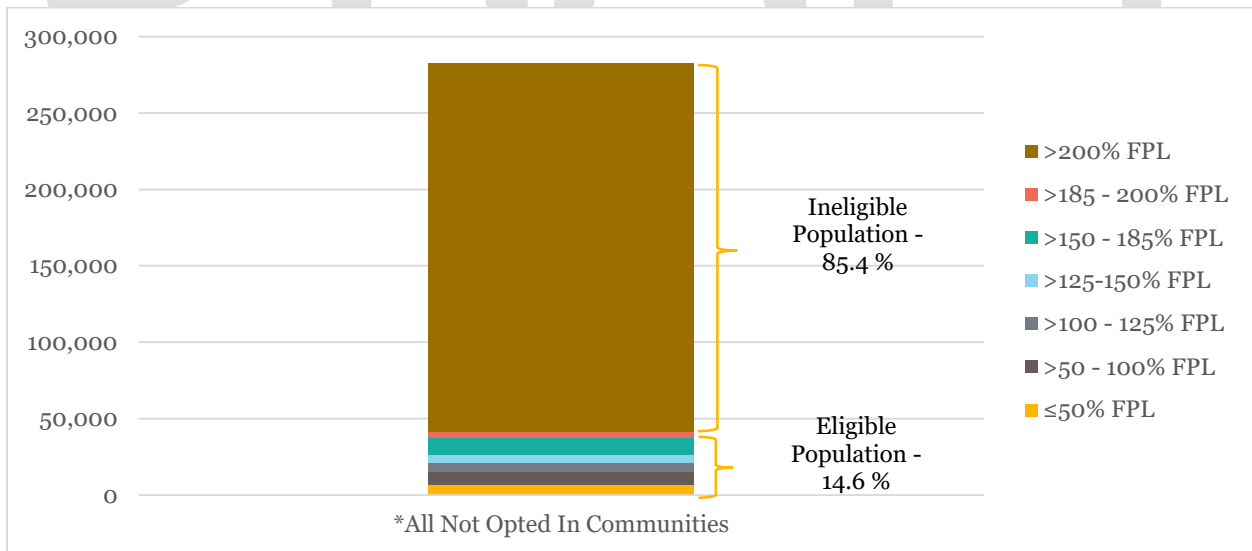
Source: U.S. Census Bureau. December 19, 2020. American Community Survey 2014-2018 5-Year Estimates. "Ratio of Income to Poverty Level in the Past 12 Months". https://data.census.gov/cedsci/

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