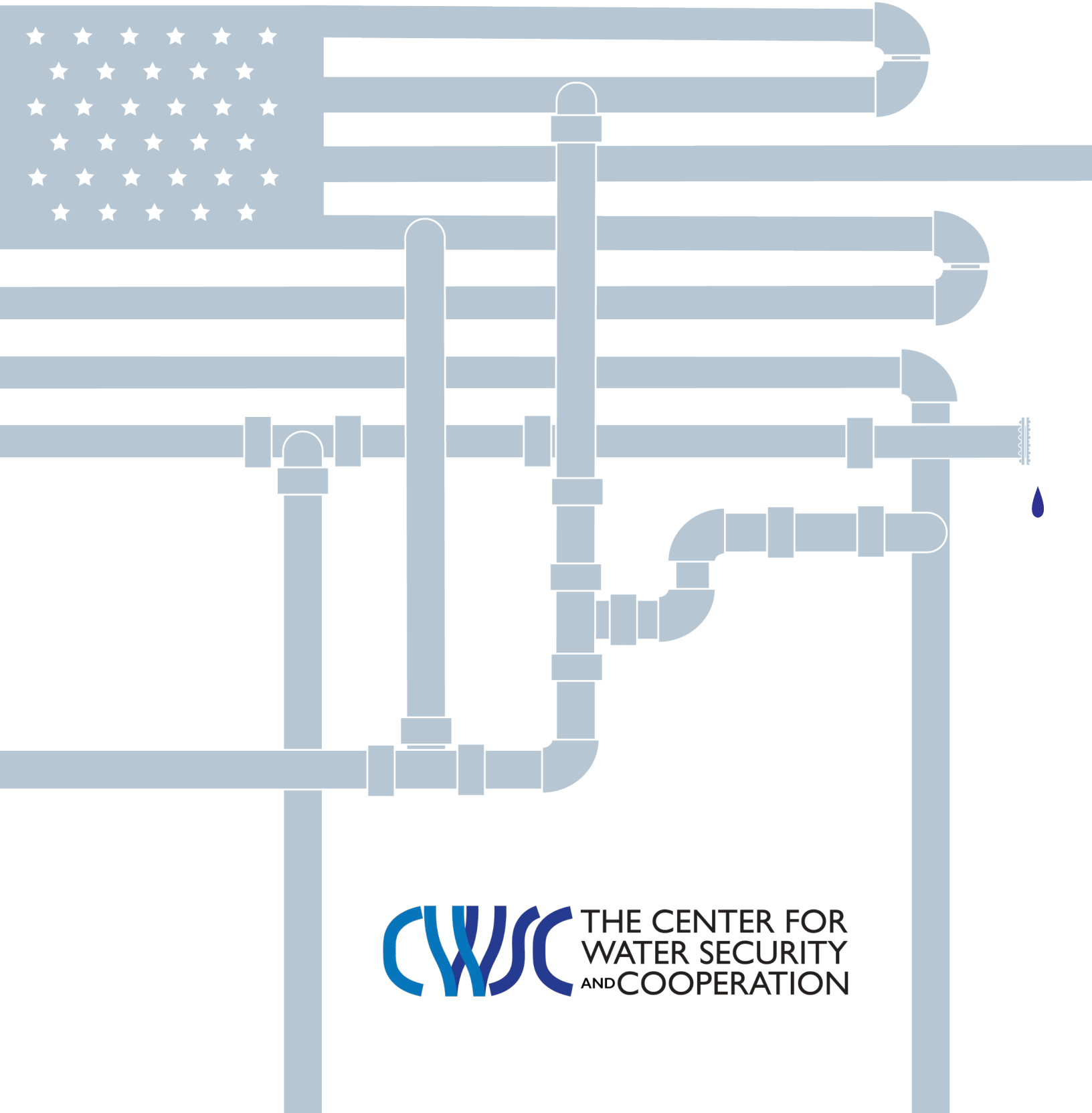


AMERICAN WATER ACCESS SURVEY

FIRST EDITION

SPRING 2022



CWSC THE CENTER FOR
WATER SECURITY
AND COOPERATION

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EXECUTIVE SUMMARY

The Center for Water Security and Cooperation has developed the American Water Access Survey (AWAS) to ensure that families have, get and keep access to water. The AWAS is a standard-setting and benchmarking tool used to identify which communities experience the greatest risk of losing access to water and to track progress in advancing equitable, permanent gains in access to water.

Guaranteeing access to water is too important to leave to chance. We need a clear metric that defines success, identifies at-risk communities, and tracks progress. Without a clear objective we will never know if access has been achieved or when it is under threat. And without a benchmark, communities cannot proactively monitor and respond to threats to their access to water. The AWAS will empower communities, utilities, and Federal, State and local governments to work together to guarantee access to water for all.

This Report publishes the results from the first application of the AWAS. Having access to water requires four ingredients. Those include: 1. sufficient water resources, 2. household-level infrastructure to deliver water and take away dirty water, 3. good quality water services, and 4. economic access to water despite an inability to pay. The first iteration of the AWAS focuses on ingredient four: economic access to water despite an inability to pay. The first AWAS was completed in six cities across the United States, including Cleveland, Ohio; Detroit, Michigan; El Paso, Texas; Richmond, Virginia; Shreveport, Louisiana; and St. Louis, Missouri. Based on the results of the first AWAS, there is one conclusion that prevails: low-income households are losing access to water for being unable to pay, and the law as written is inadequate to protect low-income households' access to water.



INTRODUCTION

“I felt like I had failed my kids, that I was a terrible mother, because I couldn’t pay my bill.” These desperate words, from a mother in El Paso, TX, highlight the issues facing water access in America. Denial of economic access, when people lose access to water because they cannot afford to pay, is often hidden from view. The CWSC, through this report and our prior work on this issue, seeks to identify ways to ensure that utilities and customers are both part of the conversation of closing this gap.

This report, the first edition of the American Water Access Survey, is the culmination of months of research and work. By looking at a snapshot of six American cities and their progress towards sustainable access, we launch both a deeper conversation of water access in America and our benchmark that will monitor the progress we make and the goals we achieve.

We were proud to work with utilities and community action agencies across the United States to get this unique perspective on the struggles of American families. Economic access is just one part of the overall puzzle. We are excited that this report helps launch our overall efforts to quantify and track access to water across this nation.

Our report lays bare some surprising gaps in our water governance, realities that we will have to grapple with and address as communities. The conversation that is needed is not one of blame or demonization; but one that seeks to answer some critical questions, among them: how do we ensure that no American is cut off from water because of poverty and what resources are needed to close this gap sustainably and permanently?

Congress has already taken some initial steps, some in response to COVID and others with a longer view. We believe that more data, more information, and more exposure will help to drive the conversations that we *need* to have in our individual communities and at every other level.

This report focuses on six cities as a start. But the issues and stories from these cities could come from any community. It’s time everyone had access to water. No excuses, no delays.

METHODOLOGY

CITY SELECTION AND DEMOGRAPHICS

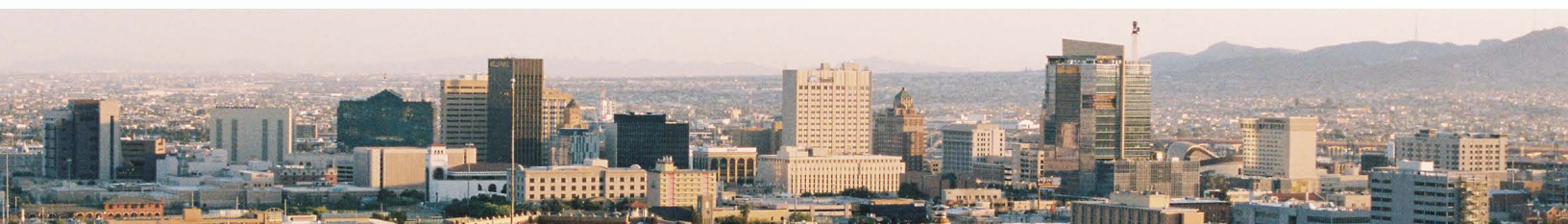
To apply the first iteration of the American Water Access Survey (referred to as AWAS or benchmark), we selected six (6) cities: Cleveland, Detroit, El Paso, Richmond, Shreveport, and St. Louis. We selected these cities based on three criteria: percentage of community below 150% of the Federal Poverty Line (FPL), percentage of community with Black, African American, or Hispanic/Latino/a/x residents, and population size between 100,000 and 750,000 residents. We wanted to focus on communities with greater numbers of households struggling to make ends meet. In particular, given recent research on often outsized impacts felt by communities with greater percentages of minority residents, we wanted to use this first iteration of the survey to highlight challenges magnified by historical and systemic racism. We also wanted geographic diversity and representation from across the United States.

DATA AND INFORMATION SOURCES

The objective of the AWAS is to reveal where communities are at risk of losing access to water and to enable communities to take the actions necessary to change that outcome. The AWAS sets a standard for achieving access to water, focusing on what is necessary to achieve access to water as reflected in the law and in practice. When conducted, the AWAS is a benchmarking tool that examines legislative action as well as utility and household behavior, exposing which communities may be at risk of losing access to water and the source of that risk. Therefore, we examine the law and the rules adopted by the utility, both formal rules like regulations or policies or informal rules like the information they present on their websites for customers. We also use surveys to collect information about the practice and impact of the law. To conduct our research, we used four sources of information: 1. local law, 2. utility websites, including

utility policies, practices, and guidelines, 3. utility survey data, and 4. household survey data. The local law, including the city charter and city codes of ordinances, are available online for each city. We examined the city charter and the city codes of ordinances to find any provisions related to the indicators set forth in the benchmark. Most city codes included very little, if any, information related to the benchmark indicators. We also researched the utilities' websites for information related to the benchmark indicators as well as any utility policies, rules and regulations, or guidelines that were available online. We expect that all the information being collected through the benchmark should be publicly available through the local laws and on the utility website because this information significantly impacts customers, whether they receive services, and is critical to the relationship between the utility and the customer.

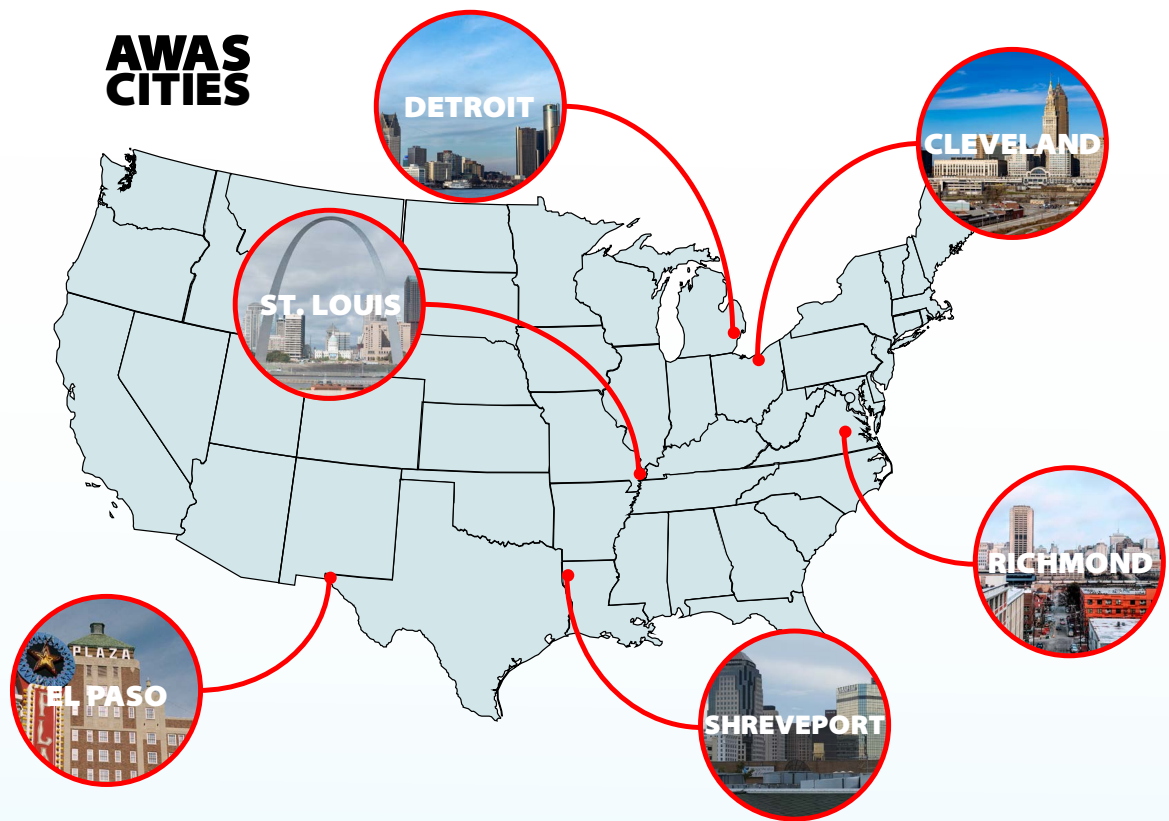
We developed two surveys to collect information from utilities and households. We had three reasons for surveying utilities. First, much of the data and information we sought to collect was not available through publicly available sources. Second, even though some information is available through the local law or the utility website, that information can be inaccurate, sometimes contradictory, or incomplete. For example, websites may not list the most up-to-date fees or policies, so the survey allows us to ensure that the information we have is the most up-to-date. Third, we also used the surveys to obtain information that was public, but not publicized. For example, we wanted to understand what utilities need to eliminate disconnections for nonpayment to low-income households. This information requires direct communication with the utility and would otherwise not be available online. We also called utility customer service call centers to collect and clarify certain information regarding fees and charges that might be charged in the event of a late fee or a nonpayment. This, again, helped us to understand what information is available to customers.



The second survey was for customers and households. We had several reasons for surveying households. First, there is limited data and information available about what a household experiences when customers are unable to pay their water bill and are disconnected. For example, we wanted to know if disconnection notices or payment plans are used, and how they impact customers. Second, we wanted to understand how households make decisions about the bills they pay. Households with limited financial resources have to make choices, some of which are guided by payment or rate assistance. We wanted to know how households pay bills when they do not have enough money. We also wanted to understand how they prioritize their bill pay and why they prioritize their bills in that order. Third, we wanted to understand the physical and emotional impact that water shutoffs have on families. Fourth, we wanted to understand households' level of indebtedness and what their alternative sources of water are when water is shut off. Understanding the household experience is critical to creating solutions that respond to real challenges and identify the best areas for intervention.

We limited the questions we included in both utility and household surveys. For households, we

did not want the survey to be burdensome. Most questions were multiple choice, allowing participants to choose among the options provided. Where we felt there may be an alternative answer we included an “other” option in order to collect the most accurate responses. The remaining questions were short-answer. Some short-answer questions asked for specific factual data, such as the amount the household owed the utility or the longest number of days they had been disconnected from services. Others asked for subjective data, for example, explanations of their thinking. After consultations with Project Bravo, we also translated the survey into Spanish to ensure that residents of El Paso would be able and willing to



participate. For utilities, we wanted to increase the likelihood that utilities would be willing to participate. After receiving the answers to the first utility survey, we followed up with additional questions in a supplemental survey. The supplement sought to clarify and expand upon answers received in the first survey. Other questions sought to better understand additional challenges and pressures on utilities.

We had a strong participation from utilities and households. Of the six utilities being studied—including Cleveland Water, Detroit Water and Sewerage Department (DWSD), El Paso Water (EP Water), City of Richmond Water Utility (Richmond Water), Shreveport Water & Sewerage Department (Shreve-

port Water), and the City of St. Louis Water Division (St. Louis Water)—five utilities completed our original survey.¹ Cleveland Water is currently involved in litigation on the topic of water access and was advised by their counsel not to respond to our survey until the litigation had concluded. Two of the five utilities—Shreveport Water and St. Louis Water—completed the supplemental survey. DWSD converted the supplemental survey into a Freedom of Information Act (FOIA) request, and the results were not available at the time of publication. EP Water and Richmond Water were not available to participate in the supplemental survey. To reach households, in each city we partnered with community action agencies that provide direct assistance to low-income households or nonprofits involved in advocacy on issues of water equity and water access, including Step Forward in Cleveland, We the People of Detroit, Wayne Metropolitan Community Action Agency, and Freshwater Future in Detroit, Project Bravo in El Paso, the Capital Area Partnership Uplifting People (CAPUP) in Richmond, Socialization Services in Shreveport, and the Urban League of Metropolitan St. Louis, Inc. in St. Louis. Each community action agency and nonprofit took a different approach to reaching out to households. For example, Wayne Metropolitan emailed the survey link to clients, Project Bravo both text and emailed the survey links - one in English, one in Spanish - to clients, CAPUP asked residents to complete the survey during the in-person intake process, Urban League of Metropolitan St. Louis put fliers in the lobby for clients to take and encouraged clients to participate, and Step Forward emailed the survey link to clients as well as included the survey information and link in the monthly Newsletter. Participation levels varied across the cities.²

DEMOGRAPHIC DATA*						
AWAS City	County			City		
	County/ Parish	Population (2020)	150% FPL	Population	% Black or African American	% Hispanic or Latinx
Cleveland, OH	Cuyahoga	1,264,817	16.2%	372,624	48.8%	11.9%
Detroit, MI	Wayne	1,793,561	19.8%	639,111	78.3%	7.7%
El Paso, TX	El Paso	865,657	18.8%	678,815	3.6%	81.4%
Richmond, VA	Henrico	334,389	8.7%	226,610	46.9%	6.9%
Shreveport, LA	Caddo	237,848	24.1%	187,593	57.1%	2.6%
St. Louis, MO	St. Louis	1,004,125	9.3%	301,578	46.4%	4%
*All figures from the U.S. Census Bureau.						

AMERICAN WATER ACCESS SURVEY METHODOLOGY

In April 2021, the Center for Water Security and Cooperation published a discussion paper defining access to water and sanitation entitled, “Access Defined: Linking Source, Shelter, and Service.” Without clear

ADDITIONAL DEMOGRAPHIC DATA*						
	City	Congressional District			State	
	Median Household Income (MHI)	District (State-Number)	Number of Households receiving SNAP benefits (2018)	Median Household Income of Households on SNAP	Average LI-HEAP heating/cooling benefit 2019	% of eligible population receiving LIHEAP benefits
Cleveland, OH	\$30,907	OH-11	70,928	\$14,402	\$285/\$0	19%
Detroit, MI	\$30,894	MI-13	80,942	\$16,596	\$160/\$0	67%
El Paso, TX	\$47,658	TX-16	48,725	\$20,102	\$199/\$714	7%
Richmond, VA	\$47,250	VA-4	33,775	\$22,309	\$449/\$267	31%
Shreveport, LA	\$39,090	LA-4	48,796	\$17,354	\$387/\$372	12%
St. Louis, MO	\$43,896	MO-1	54,288	\$18,071	\$286/\$0	26%

*Figures from Department of Health and Human Services (HHS), U.S. Department of Agriculture, or U.S. Census Bureau.

goals and a way to know the goals have been achieved, we knew that millions of households would remain without access to water and sanitation or would lose access in time. The discussion paper, as a first step, defined the main goal: to achieve universal access to water, defined as “having in-home, reliable availability of sufficient water to meet domestic needs safely,” and to achieve universal access to sanitation, defined as “having in-home availability of sanitation infrastructure to safely collect and transfer solid and liquid domestic waste to a treatment facility or to safely collect and treat solid and liquid waste onsite.” Having set this goal, we focused on how to achieve it.

Defining the factors we monitor to identify progress in meeting our goals was a first step. We asked: what are the criteria that allow us to know whether we have achieved universal access to water and sanitation, or are at least advancing toward those goals? The discussion paper set forth a simple framework for conceptualizing how to measure progress. The paper identified four main ingredients necessary to guarantee physical and economic access to water and sanitation, which include: 1. sufficient water resources, 2. household-level infrastructure to deliver water and take away dirty water, 3. good quality services, and 4. economic access to water despite an inability to pay. This structure forms the basis of the American Water Access Survey we are creating, and the fourth component—economic access—is the focus of this first AWAS.

Building on work we have done to create stronger protections from water shutoffs for low-income households who cannot afford to pay, the AWAS identifies the indicators used to measure communities’ progress toward ensuring that a household, despite their inability to pay, will retain access to water and sanitation. Our accompanying work describes why those indicators were chosen. The indicators look at both the law as written, and the law as practiced. The law as written sets forth the rules that govern decision-making, and actions taken as well as identifies rights, authorities, responsibilities, and processes. The law as practiced represents how that law actually impacts decision-making and results. Together, they allow us to understand whether a community has access to water and how likely they are to keep or lose that access.

AWAS RESULTS

The AWAS results shine a light on how unprotected and threatened low-income households' access to water is. In the six cities we focused on, the threats are numerous. The survey examines sixteen (16) factors for each city. On average, the law is silent on twelve (12) of the 16 factors. This means, the law as written offers no protections to low-income households. Where a household has no financial resources to pay their water or wastewater bills, the law for each of the six cities allows the utility to shut off water services to the family. The law places no limitations on the utility's authority to terminate water services to low-income households. The law does not require consideration of the ability to pay before terminating water services to low-income households. This ultimately means that the law creates no guarantee to water access, even when a family faces an inability to pay. The law fails to create any protections for families who are vulnerable to losing access as a result of their income-level. In each of the six cities, the law has given the utilities a blanket authority to shut off water services for nonpayment. The survey shows that the law is silent on most of the factors examined, except where the law expressly gives each city the authority to terminate water services for nonpayment. Otherwise, the law largely sets no parameters or guardrails. As a result, the law in each of the six cities is failing low-income households, and the survey demonstrates how deep that failure goes.

One city's code did have greater protections compared to the other five cities' codes. The code for Detroit addresses more of the benchmark topics than the others, and it still comes up short.

When we look at how utilities have exercised the authority granted under the law, the result is also concerning. Every utility authorizes shut-offs of water to low-income households who cannot pay. For five utilities—DWSD, EP Water, Richmond Water, Shreveport Water, St. Louis Water—between 600 and 22,000 water shutoffs are conducted per month. Utilities are not required to offer either a payment plan or rate assistance before terminating water services. In addition, all five utilities charge at least one fee for late or nonpayment. Only Cleveland Water does not charge any fees for late or nonpayment.

This means that while the water bills remain outstanding, additional fees can accumulate and make it harder and harder for a low-income household to pay and maintain water access. Where fees are charged, the law makes no special allowance for fee forgiveness, even for low-income customers. While the current situation keeps low-income households in danger of losing water, the survey results show that there are opportunities for utilities to assist low-income households and stay connected to water.



		Cleveland	Detroit	El Paso	Richmond	Shreveport	St. Louis
LAW AS WRITTEN	Water shutoffs permitted or forbidden for nonpayment	Water shutoff allowed (no income-based restrictions)	Water shutoff allowed (no income-based restrictions)	Water shutoff allowed (no income-based restrictions)	Water shutoff allowed (no income-based restrictions)	Water shutoff allowed (no income-based restrictions)	Water shutoff allowed (no income-based restrictions)
	Shutoff notice	Notice required before shutoff	Not stated	Not stated	Notice required before shutoff	Notice required before shutoff	Not stated
	Period required between nonpayment and shutoff	More than 10 (business) days required	Not stated	Not stated	Not stated	Not stated	Not stated
	Formal water shutoff policy (i.e. terms and conditions) required to be written and published by the service provider	Not required	Not required	Not required	Not required	Required	Not required
	Late fee allowed to be charged	Not stated	Not stated	Not stated	Not stated	Not stated	Not stated
	Limit on late fee allowed to be charged	Not stated	Not stated	Not stated	Not stated	Not stated	Not stated
	Disconnection fee allowed to be charged	Not stated	Yes	Not stated	Not stated	Not stated	Not stated
	Limit on disconnection fee allowed to be charged (i.e. tied to cost of disconnecting services)	Not stated	No	Not stated	Not stated	Yes, an arbitrary number	Not stated
	Interest allowed to be charged	Not stated	Not stated	Not stated	Yes	Not stated	Not stated
	Limit on interest allowed to be charged	Not stated	Not stated	Not stated	Yes	Not stated	Not stated
	Reconnection fee allowed to be charged	Not stated	Not stated	Not stated	Not stated	Not stated	Yes
	Limit on reconnection fee allowed to be charged (i.e. tied to cost of reconnecting services)	Not stated	Not stated	Not stated	Not stated	Not stated	Yes, an arbitrary number
	Whether unpaid water or wastewater bills can become a lien, leading to a foreclosure	Yes	Yes	No	Yes	Not stated	Yes
	Whether foreclosure is prohibited on basis of just a water or wastewater bill-based lien	Not stated	Not stated	Not stated	Not stated	Not stated	Not stated
	Ratepayer revenue funded customer assistance programs	No express authority or prohibition	Express prohibition	No express authority or prohibition	No express authority or prohibition	No express authority or prohibition	No express authority or prohibition
	Reporting of water shutoffs based on unpaid water and/or wastewater bills because of inability to pay	No express requirement to report water shutoffs	No express requirement to report water shutoffs	No express requirement to report water shutoffs	No express requirement to report water shutoffs	No express requirement to report water shutoffs	No express requirement to report water shutoffs
		Cleveland	Detroit	El Paso	Richmond	Shreveport	St. Louis
LAW AS PRACTICED	Shutoffs have been executed against households for inability to pay (in the last three years)	Yes	Yes	Yes	Yes	Yes	Yes
	Payment assistance must be offered before a water shutoff	-	No	No	No	No	No
	Rate assistance must be offered before a water shutoff	-	Yes	No	Yes	No	No
	Assistance offered to households who cannot pay bill	Rate assistance available to customers who cannot pay	Rate assistance available to customers who cannot pay	Rate assistance available to customers who cannot pay	Rate assistance available to customers who cannot pay	Rate assistance available to customers who cannot pay	Payment plans available to customers who cannot pay
	Interest charged on bills paid after due date	No	No	No	Yes	No	No
	Late fee charged on bills paid after due date	No	Yes	No	No	Yes	No
	Disconnection fee assessed	No	Yes, not pegged to cost	Yes, not pegged to cost	Yes, not pegged to cost	Yes, not pegged to cost	Yes, not pegged to cost
	Reconnection fee assessed	No	Yes, not pegged to cost	Yes, not pegged to cost	Yes, not pegged to cost	No	Yes, not pegged to cost
	Reconnection terms	Past-due bills paid in full, including any late or nonpayment fees or charges OR Payment plan established	Past-due bills paid in full, including any late or nonpayment fees or charges OR Payment plan established	A portion of the unpaid bills must be paid	Past-due bills paid in full, including any late or nonpayment fees or charges OR Payment plan established	Past-due bills paid in full, including any late or nonpayment fees or charges OR Payment plan established AND Deposit required	Past-due bills paid in full, including any late or nonpayment fees or charges AND Presence required
	Water shutoff policy	No	No	No	No	No	No
	Number of water shutoffs executed published	No	No	No	No	No	No
Utility has a website	Yes	Yes	Yes	Yes	Yes	Yes	

FINDINGS

In looking at the local law governing access to water and surveying water utilities, we examined seven areas: (1) water shutoffs, (2) notices for water shutoffs, (3) fees and charges for late payments or non-payments, (4) liens and foreclosures, (5) payment plans and rate assistance programs, (6) reinvestment of ratepayer revenue into water and wastewater utilities, and (7) data and information transparency. The findings discussed below are based on an examination of the law, utility website and any available written utility policies or practices, and the results for the utility surveys.

1

All six utilities are allowed to shut off low-income households' water for non-payment. All six utilities use their authority to shut off water for nonpayment.³ Three of five utilities surveyed also allow water to be shut off for water leaks.

All six utilities are allowed to shut off water under local law and all use that authority to shut off water services where there is nonpayment. Through our utility survey, we know that all six utilities use their authority to shut off water for nonpayment.⁴ Of the five utilities surveyed, the average water shutoffs per month range from 500 to 22,000.⁵ Four of five utilities indicated that there is no limit on disconnections to low-income households.⁶ EP Water did not answer the question, but there is no evidence to suggest they have any limits on disconnecting water services to low-income households for nonpayment. Local law places few, if any, limitations on the ability to shut off water. Local law grants utilities the authority to shut off water services to low-income households for nonpayment. The law does not create any exceptions for low-income households who are unable to pay because of a lack of financial resources. Furthermore, the law does not require either rate assistance or a payment plan to be offered before water services are disconnected. The utilities are given complete discretion as to how to exercise their

water shut off authority. Where there are limitations in the law, they focus on when the water can be shut off.⁷ Therefore, low-income households are subject to laws that allow water services to be shut off for nonpayment without any consideration of ability to pay, and utilities use that authority without placing any limitations on themselves.

DWSD's approach is unique among the six utilities surveyed. The City of Detroit Water and Sewerage Department's Interim Collection Rules and Procedures state that "DWSD may shut off service...to a customer for...nonpayment of a delinquent balance, provided that DWSD has notified the customer of the delinquency and made diligent effort to have the customer pay the outstanding or delinquent balance, either in whole or through a reasonable [Personal Payment Agreement (PPA)]."⁸ Under its internal rules, DWSD's ability to shut off water services is made contingent on DWSD making a "diligent effort" to have the customer pay their outstanding and delinquent balance or enter into a payment plan agreement. However, the rules do not define a "diligent effort." Therefore, it is not clear what exactly is required or expected of the DWSD.⁹

Three of the five utilities surveyed—EP Water, Shreveport Water, and St. Louis Water—also shut off water when a household has water leaks, often called "water wastage" in local laws.¹⁰ Water wastage is when water leaks through old or faulty pipes, fixtures, and faucets. Millions of gallons of water annually are lost through pipes on public and private property. Where water leakage is found on private property, typically discovered through an unusually high water bill, a household can be required to pay to fix the infrastructure causing the leak. If they don't fix the leak, they face a water shutoff. These households may also be expected to pay the unusually high bill. The cost to fix the water infrastructure, sometimes in the thousands of dollars, must be paid by the household. If the household cannot afford to pay for the infrastructure to be fixed, the household could have their water shut off. And, depending on the state, state law may prohibit the state from using public funds to provide assistance to a low-income household that needs to complete these repairs, further limiting their options.¹¹

Data collected from Survey ▼	Detroit	El Paso	Richmond	Shreveport	St. Louis	Cleveland
Household customers (water services)	175,000	199,658	69,188	66,000	77,500	Cleveland did not participate in the utility survey portion of this year's AWAS.
Household customers (wastewater services)	175,000	193,764	69,188	66,000	0	
Customers with arrearages	127,000	67,363	27,800	11,000	12,586	
Household arrearages: low	-	\$0.01	\$75.81	\$50.00	\$100.00	
Household arrearages ^a	-	\$14,144.94	\$227.43	\$5,000.00	\$7,305.27	
Average household arrearage	\$600.00	\$175.00	\$151.62	\$310.00	\$367.97	
Average household customer shut offs per month ^b	-	22,000	600	1100	2,100	
Average length of a household water shut off	One month	One month	One month	One month	Less than a month	
Households where water bills become a lien ^d	N/A	N/A	6,600	N/A	1,800	
Total amount of unpaid household bills in a fiscal year ^c	Over \$50,000,000	-	\$3,400,000	-	-	
Utility sells uncollected customer debt to a third-party debt collector	N	N	N	Y	Y	
Total customer debt load carried by utility	148,600,000	-	\$69,000,000	\$8,000,000	6,700,000	

(a) Detroit stated that 35% of accounts owe more than \$1000.00.

(b) Detroit stated that prior to COVID-19, Detroit had approximately 22,000 residential water shutoffs in the previous 12 months.

(c) Detroit has not turned water bills into liens since 2013.

(d) El Paso does not track total amount of unpaid household bills or total customer debt load.

2

Only three of the six cities' laws require notice to be provided of an impending water shutoff. However, all utilities do provide notice of a water shutoff.

Three utilities—Cleveland, Richmond, and Shreveport—are required by law to provide notice of a water shutoff before the water shutoff occurs. The remaining three utilities are not required by law to tell a customer that they are about to shut off their water services. Without notice, the customer would not have the opportunity to prevent the water shutoff, to apply for rate assistance, to seek assistance from a nonprofit that offers financial support to eligible low-income households, or to negotiate a payment plan with the utility.

While local law does not require notice to be provided of an upcoming water shutoff before the shutoff occurs, the rules and regulations promulgated by two utilities—DWSD and EP Water—do require notice to be given before water services are terminated due to nonpayment. There is no information regarding notice of late payments or impending shutoffs in St. Louis's municipal law, nor is there any information on the utility website. Therefore, ultimately five of six utilities surveyed are required by law or available internal policy to provide notice of a water shutoff before the shutoff occurs either based on the law or utility policy.

Through the utility survey, all responding utilities stated that there is a law or internal policy that requires customers to be notified before a water shutoff.¹² Two utilities—EP Water and St. Louis Water—send a First-Class letter.¹³ Two utilities—Richmond Water and Shreveport Water—include the notice on the bill. One utility—DWSD—leaves a notice at the residence. One utility—Shreveport Water—emails the account holder.

The required timing of water shut off notices differs between utilities. Cleveland Water is required to send notice of a water shutoff at least fifteen days before the date of termination.¹⁴ Because the requirement is based on sending and not receipt, it is possible that the notice will not be received before the date of the shutoff.

Households served by Richmond Water must be notified at least five days prior to the disconnection date.¹⁵ Further, water services cannot be terminated until ten days after a written notice has been mailed to the person in default.¹⁶ To even qualify for a water shutoff, water and wastewater bills must have remained unpaid for at least 60 days after the date appearing on the bill before water services can be shut off.¹⁷

DWSD's utility rules require that two notices be sent to customers before a water termination. The first notice will be issued eleven (11) days after the water bill becomes due. A "Water Shut Off-Final Notice" will be issued once the account has remained unpaid for thirty-two days after the billing date.¹⁸ Services will then be discontinued if the bill is not paid within ten days of the date specified as the "Notice Date" on the Final Notice.¹⁹

For EP Water customers, water bills are due fourteen days after the billing date, with an additional grace period of seven days observed.²⁰ St. Louis Water requires the bill to be paid within twenty days of the billing date.²¹ The St. Louis Water website states, "We give you every opportunity to settle your account," but provides no additional information about grace periods or timelines by which notices must be sent or received. The City of Shreveport's law and Shreveport Water's published policies are similarly silent.

3

Cities laws vary significantly on whether they explicitly allow fees or charges to be assessed for late payments, nonpayments, disconnections or reconnections. Five utilities levy at least one fee against low-income households for late or nonpayments.

Utilities typically charge fees for payments not received by the due date, failure to pay the bill, disconnection of service as a result of nonpayment, and reconnection of services once the balance is paid. Looking at the table below, these fees and charges as well as the terms for reconnection vary significantly from utility-to-utility.

	Interest	Late Fee	Disconnection Fee	Reconnection Fee	Reconnection Terms
Cleveland, OH	None	None	None	None	<ul style="list-style-type: none"> -All delinquent charges must be paid in full -Or must enter into a payment plan
Detroit, MI	None	5.0%	\$40.00	\$40.00	<ul style="list-style-type: none"> -Delinquent account paid in full -A responsible person must be present at the premises -“Turn-on” fee will be assessed -DWSD must restore service within 24 hours -Or a payment arrangement can be made
El Paso, TX	None	None	\$20.00	\$25.00	<ul style="list-style-type: none"> -A payment of some amount must be made. The payment amount accepted is based on the size of the unpaid bill. If a high balance remains, then an installment plan is offered. -If the account has become inactive, then a \$75 fee (i.e. deposit) must be paid. A \$150 deposit is required for duplexes.
Richmond, VA	0.83%	None	None	\$35.00	<ul style="list-style-type: none"> -Delinquent account paid in full or make arrangements for the payment of the bill (including the service reconnection charge) -Service will be restored in the “regular course of business on a succeeding workday” and is not required to be restored on the same day
Shreveport, LA	None	5.0%	\$50.00	None	<ul style="list-style-type: none"> -Delinquent amount paid in full (including all fees for disconnecting and reconnecting services) or a payment plan for delinquent bills and fees has been established -Required deposit is paid
St. Louis, MO	None	None	\$30.00	\$30.00	<ul style="list-style-type: none"> -Delinquent amount paid in full with a money order or check (including the service charge) -Must show up in person at City Hall or the Customer Service Hall -Service will be restored “as soon as possible”
<i>Information gathered from local law, utility websites, and conversations with customer-service representatives.</i>					

No city's law either explicitly allows utilities to charge late fees, or explicitly prohibits such a charge.²² Utilities may charge late fees—or fees for paying the bill after the due date—each month that the bill remains unpaid. DWSD's utility rules state that a “five (5) percent late payment charge on the unpaid portion of the current bill and on the following charges” will be assessed against bills paid after the due date.²³ Detroit municipal law does not place any limitations on the amount of the late fee that can be charged, how the late fee is calculated, or whether there are any circumstances under which the late fee should be or must be waived.

With respect to interest fees, city law for five of the six cities neither explicitly permits or prohibits an interest fee from being charged by the utility while a water or wastewater bill remains unpaid. The laws also do not place any limit on the interest fee that can be charged or set forth any rules to govern how the interest fee can be calculated. Only one utility—Richmond Water—is explicitly allowed to charge interest on late or unpaid bills. In Richmond, if a water bill remains unpaid as of the due date on the statement (which is set as close to 30 days from the statement date as possible), the payment becomes immediately subject to an interest charge of 0.83 percent of the unpaid balance. For each billing period after the date that the initial interest fee is charged, the unpaid balance becomes subject to an additional interest charge of 0.83 percent. However, where a residential customer has an “existing special agreement” or enters into a “special agreement” with Richmond Water and remains in compliance with the agreement, no interest fee will be charged. It is unclear whether or not any interest fees that have accrued previous to entering into such an agreement are still charged against the customer. Richmond Water does have the broad discretion to waive an interest fee charged against a residential customer.²⁴

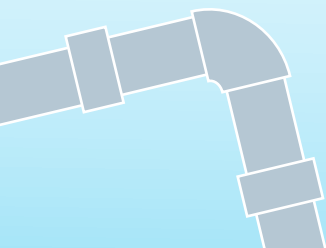
Only two of the six utilities—DWSD and Shreveport Water—are explicitly allowed to charge a disconnection fee for nonpayment.²⁵ The remaining utilities are neither explicitly allowed nor prohibited from charging a disconnection fee for nonpayment by local law. Further, the law does not limit how the disconnection fee is calculated or how much can be collected.

Shreveport offers a unique example. The law states that the cost for terminating services at the meter box is \$500.00.²⁶ There is no description of how that number was calculated, or any discussion of rules that should determine how that number should be calculated. However, the cost charged to disconnect sewer services must be exactly the actual cost of disconnection.

If it becomes necessary to disconnect from sewer service, the director of water and sewerage shall cause an itemized statement to be prepared for actual cost of disconnection and an estimate for reconnection to such service, and such actual and estimated costs shall be paid prior to restoration of service. If the estimate of cost differs from the actual cost for restoring service, an adjustment will be made in the customer's billing.²⁷

If a fee is charged for disconnection or reconnection, there is no statutory requirement that the fee correlate with the expenses incurred for the disconnection or reconnection. Without this requirement, a disconnection fee could become another penalty levied against households that are struggling to pay.

Only one utility—St. Louis Water—is explicitly allowed to charge a reconnection fee under local law. The remaining five utilities are neither prohibited from nor explicitly allowed to charge a reconnection fee. St. Louis Water cannot reconnect water services until “all outstanding water debts” have been paid in full and a \$30.00 fee for turning services back on has been paid in advance of the reconnection.²⁸ Three of the five utilities—DWSD, EP Water, and Richmond Water—charge both disconnection and reconnection fees. Shreveport Water charges only a disconnection fee.



4

Three utilities submit unpaid water bills to be converted to liens, which means that a family can lose its home because of an unpaid water or sewer bill.

Three utilities—including Cleveland Water, Richmond Water, and St. Louis Water—submit unpaid water bills to become liens on the property that received the unpaid water services. On average annually, Richmond Water’s 6,600 unpaid water bills become liens. In St. Louis 1,800 unpaid bills become liens. In Cuyahoga County, where Cleveland is located, more than 11,000 water liens were placed on residential properties between 2014 and 2018.²⁹ Detroit has the authority to add unpaid bills to property taxes due as a means of collection, and to use liens when the bills remain unpaid. However, according to DWSD, unpaid bills have not been added to property tax bills in Detroit since 2013. Liens are still used by Detroit, though it does not appear that these liens are enforced through foreclosure.³⁰ Instead, the unpaid water bills remain with the property, and if the property is sold without the unpaid bills being settled during the real estate closing, the new owners become responsible for the unpaid water bills.³¹

Four utilities—including Cleveland Water, DWSD, Richmond Water, and St. Louis Water—under either State or local law have the authority to convert unpaid water bills to become a lien on the property.³² Other than providing the authority, the laws place few if any limitations on how that authority can be exercised. In Richmond, unpaid water or wastewater service charges cannot be declared a lien until all or a portion of the unpaid account has been outstanding for at least ninety days.³³ In St. Louis, the Collector of Revenue is required to notify the property owner by certified mail no less than 10 days prior to filing the lien.³⁴ In Detroit, the law provides no guidelines, but does make water liens priority liens over all other liens.³⁵ No city law prohibits foreclosure on the basis of just an unpaid water or wastewater bill. The cities of El Paso and Shreveport do not have the authority to place liens. Local law neither explicitly allows nor prohibits a water bill to become a lien. In El Paso, under State law, the city could have authority to issue liens, but would need to adopt an ordinance that would authorize utility liens on delinquent properties.³⁶ El Paso has not adopted the required ordinance.

5

No utility is required under the law to offer a payment plan or rate assistance program to households who cannot pay. For now, all six utilities do offer either payment plans, rate assistance, or both. Two utilities are prohibited from using ratepayer revenue to fund the rate assistance program.

All six utilities offer payment plans and four of the six utilities—excluding Shreveport Water and St. Louis Water—offer rate assistance to customers who are unable to pay their water or wastewater bills.³⁷ Shreveport Water noted that an ordinance prohibits them from offering rate assistance.³⁸ While the utility states there is an ordinance that prohibits the utility from providing rate assistance, we could not independently verify this. While Shreveport Water cannot offer rate assistance, the City of Shreveport offers rate assistance through its Shreveport Water Assistance Program (“SWAP”).³⁹ Neither the City of St. Louis nor the utility offers rate assistance. When asked why rate assistance is not available, St. Louis Water did not provide a response. In looking at the utility website, the only information available states, “If you have a

serious problem paying your bill, please call the Collector of Revenue at (314) 622-4179.”⁴⁰

Offering these payment plans and rate assistance is optional. Five of five utilities state that the utility is not required to enter into a payment plan with the customer before a household’s water services are shut off.⁴¹ Three utilities—EP Water, Shreveport Water, and St. Louis Water—state that the utility is not required to offer rate assistance before a household’s water services are shut off.⁴² DWSD is required to offer rate assistance before services are terminated based on an internal department policy.⁴³ The internal policy requires DWSD to offer customer assistance programs to a residential customer “when they receive a notice that they are at-risk for a service interruption.”⁴⁴ DWSD also notes that offering an income-based rate would not be viable because 30 percent of water users would have to bear the costs of the remaining customers.⁴⁵ Richmond Water stated that offering rate assistance is “automatic based on consumption patterns” before a household’s water services are terminated.⁴⁶ The laws of all six cities give utilities complete discretion whether to offer either rate assistance or payment plans. The laws for each city do not require a payment plan or rate assistance be offered before water services to low-income households are terminated for nonpayment, or at all.

State or local law can limit the use of ratepayer-generated dollars for rate assistance. For example, Richmond’s local law prohibits the use of “utility operating expenses” to fund the MetroCare Water Assistance and MetroCare Water Conservation Programs.⁴⁷ However, these “utility operating expenses” can be used to cover incidental costs related to administering the programs and providing limited marketing support. Based on the language of Richmond municipal law, it is not clear whether residential rates could be calculated to defray the costs of a water rate assistance program. Michigan state law prohibits the use of ratepayer money for rate assistance programs. Under the Headlee Amendment, Sections 35-34 of Article IX of the Michigan Constitution, local governments are prohibited from levying taxes or increasing taxes without the approval of qualified electors within that unit of local government. This has been interpreted, following the *Bolt v. Lansing* decision, to prohibit the adoption of rates that would fund a rate assistance program, thereby subsidizing rates for low-income residents.⁴⁸ However, it has been argued that income-based rates would be permissible.⁴⁹

Rate assistance is paid for by different sources of funding, and utilities may have multiple sources of funding. Two utilities—Richmond Water and St. Louis Water—identify donations as a source of funding.⁵⁰ Rates fund the assistance programs for DWSD and Richmond Water. Specifically, in Detroit, the WRAP customer assistance program is funded by the Great Lakes Water Authority through wholesale rates. EP Water receives checks from “local agencies” to assist specific accounts.⁵¹

It is important to note that it is difficult to evaluate the effectiveness of these programs. One way to determine whether these programs are effective is to look at how many of the people who qualify for the program are enrolling in the program. However, this information is not available because utilities do not collect information about the income of its customers, and rate assistance program administration, where income information is collected, is typically independent of the utility.

PAYMENT PLANS

City	Description
Cleveland	Cleveland Water customers who fall behind on their water bill can call the Customer Service Call center to set up a “manageable payment schedule and see if you’re eligible for a discount bill program.”
Detroit	The Detroit Water & Sewerage Department may negotiate a reasonable Payment Plan Agreement (PPA) with a customer when “extenuating circumstances exist and payment in full cannot be made.” Currently, Detroit offers a 10/30/50 Payment Plan. A customer makes a down payment of either 10%, 30% or 50% of the past due balance. The percentage down payment is based on the number of payment plans the customer has entered into in the last 18 months. For the first payment plan offered, only a 10% down payment is owed. The second time, 30% is owed, and the third time, 50% is owed. The balance of the past due amount is equally spread over a 6-24 month period, which the customer is expected to pay in addition to their normal monthly bill. The number of months over which the unpaid balance is spread is determined based on the balance owed. All payments must be made in full and on time to stay in the plan.
El Paso	Bills are due 14 days after the billing date. A grace period of 7 days is offered to all. Their website states the following: “We understand that financial hardships can happen to anyone. We offer payment extensions and are willing to make special arrangements to help make your payments more manageable. To keep your water flowing, a partial payment is always better than no payment.” Those seeking payment extensions or payment plans should contact Customer Service.
Richmond	Customers can enter into payment plans.
Shreveport	Customers are offered payment arrangements. An upfront payment of twenty-five percent is required, and payment arrangements can extend over four months.
St. Louis	Customers are offered payment plans by the Collector of Revenue.

“I must maintain housing for me and my children, and if I don’t have running water and sanitation, Child Protective Services will take my children. The fear is real.”

-M.L.P., Detroit, MI

RATE ASSISTANCE PROGRAMS

City	Description of Program	Administering Body
Cleveland	<p>The Cleveland Water Department offers a Homestead Discount for single family homes owned and occupied either by a person sixty-five years of age or older or by a person who is permanently and totally disabled. In both cases, the occupant's total annual income cannot exceed the limits identified.</p> <p>The Cleveland Water Department, administered by the CHN Housing Partners, offers a 40% deduction on water bills to residential customers who own and live at the address receiving the discounted services and whose total annual income does not exceed 200% of the FPL.</p>	Cleveland Water Department & CHN Housing Partners
Detroit	<p>Residential customers at or below 200% of the Federal Poverty Level (FPL) can apply for the Water Residential Assistance Program (WRAP). Residential customers behind on paying their bills or struggling to pay their bills on time are eligible for the WRAP program. During a twelve-month period, the following will occur under the WRAP program:</p> <ul style="list-style-type: none"> - \$25 will be credited to your bill monthly, for 12 months (a total of \$300) - The past due amount will be frozen with successful adherence to a payment plan - Eligible to apply for up to a \$350 credit toward the past due amount after the first month of enrollment, and an additional \$350 after 12 consecutive months of enrollment - Conduct a water conservation audit if the household's water usage exceeds 20% of the average household water consumption in the city, which may include \$1,500 on average in water conservation and minor home plumbing repairs - Offer an additional 12 months (no more than 24 months total per household) of \$25 monthly bill credits and financial assistance toward arrears up to \$700, if an outstanding past due balance remains. 	Detroit Water & Sewerage Department
El Paso	<p>Amistad administers the AguaCares program. This program is available to El Paso water customers, sixty-five years of age and older facing financial hardship (i.e. whose income does not exceed 125% FPL) and at risk of being disconnected from water service. El Paso provides a referral to Amistad who may:</p> <ul style="list-style-type: none"> - Provide money management counseling - Negotiate payment plans with El Paso on behalf of the customer in order to prevent disconnection - Distribute household water-efficient fixtures to eligible customers - Offer limited payment assistance based on eligibility and funding availability - Provide referrals to other agencies or services to meet customer needs. 	Amistad
Richmond	<p>Through the MetroCare Water Assistance Program, Richmond Public Utilities customers are eligible to receive financial assistance of up to \$500.00 toward arrearages. Eligible customers must: receive a water bill in their name, occupy the residence at the address on the utility bill, have not received assistance during the current program year (July-June), not had their water utility balance sent to collections, and have a total annual income that does not exceed 225% of the FPL.</p> <p>Through the MetroCare Water Conservation Program, eligible customers are given financial assistance based on the Applicant's Conservation Need determined through the on-site audit.</p>	City of Richmond Department of Finance
Shreveport	<p>Under the Shreveport Water Assistance Program (SWAP), households are eligible to receive water services assistance if they can provide documentation that they receive assistance through other programs. Assistance can be provided for no more than two months of water and sewer bills. Assistance will not be approved where the applicant has an outstanding balance on an account that has been closed for over 30 days or has been turned over to collections, or where either the plumbing does not meet the building codes or there are leaks resulting in "extraordinary high water and sewerage bills". In the case of leaks, the plumbing must be repaired before assistance can be provided.</p>	City of Shreveport administers through Socialization Services and the Caddo Community Action Agency

6

Only one city’s law requires ratepayer revenue generated from water and wastewater services to be ringfenced for water and wastewater utilities.

Only Detroit explicitly requires ratepayer revenue to be reinvested into the water and wastewater utilities.

All moneys paid into the City treasury from fees collected for water, drainage or sewerage services shall be used exclusively for the payment of expenses incurred in the provision of these services, including the interest of principal of any obligations issued to finance the water supply and sewerage disposal facilities of the City, and shall be kept in separate funds.⁵²

Therefore, all money generated by the water, sewerage, and drainage customers in Detroit must be reinvested, in full, into those utilities.

The City of Shreveport local law states that the water and sewage utilities are to be operated together as a “single self-supporting business enterprise.”⁵³ While these utilities are supposed to be self-sufficient, which would imply that they are raising enough money from the ratepayers to pay for operation, maintenance, and capital expenses without the need for additional funding from the local government, there is no commensurate requirement to ringfence the ratepayer revenue exclusively for the utilities.

7

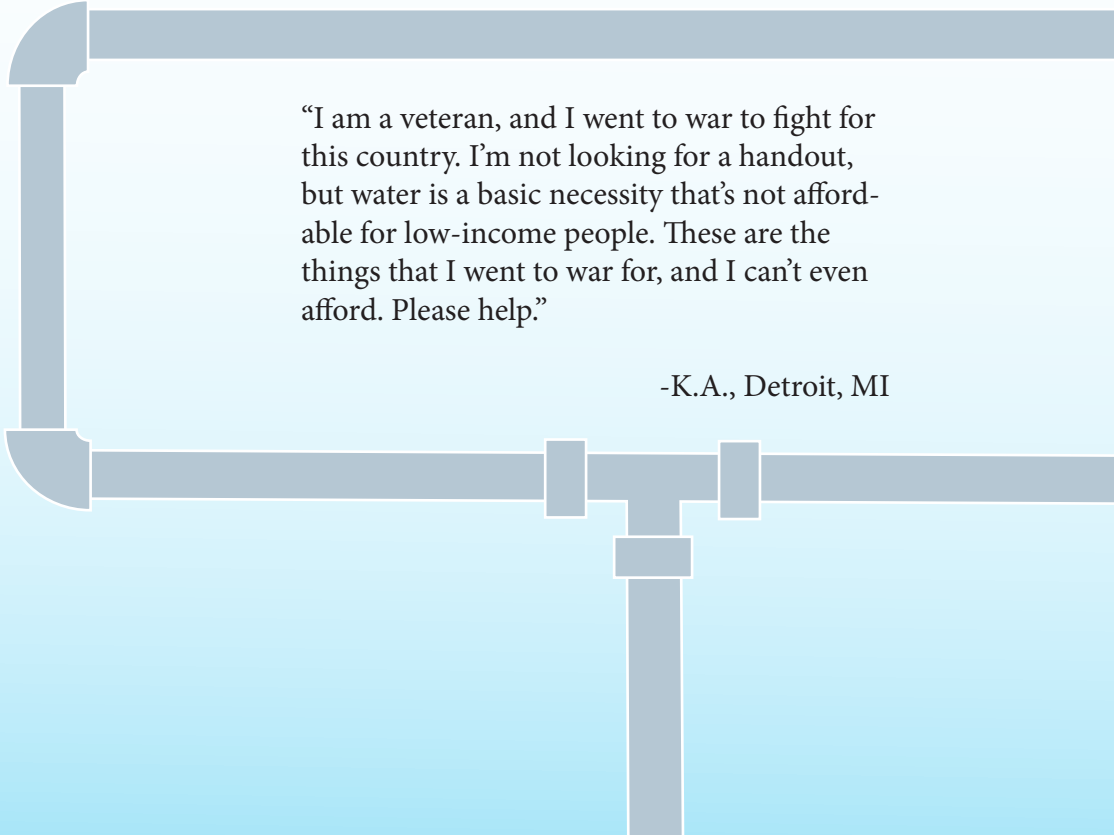
Information about utility operations and the terms and conditions of services are difficult to find and often not available.

Broadly, all six cities have municipal codes and utility websites. However, the amount of detail included in the municipal Charters and Codes varies significantly city-to-city. Equally, not every utility website provides detailed information on these topics. For example, only limited guidelines for the terms and conditions of service provision were included in Cleveland, El Paso, Richmond, and St. Louis local municipal ordinances. In these ordinances, very few rules are set, or limitations are placed on how the utility should provide water or sewer services. More direction is included in the Detroit and Shreveport local municipal ordinances, but not much more. Further, the law for five of the six cities does not direct utilities to develop formal water shutoff policies or transparent terms and conditions of services that would detail the circumstances and process for being disconnected and reconnected, including any fees, rights, or appeals processes. Shreveport municipal code requires the Director to establish rules and regulations for the procedures governing the termination of services.⁵⁴ However, these rules and regulations could not be found online.

Generally, critical information about the terms and conditions of receiving services from these utilities is hard to find. Some of the information is only available in the local law, which is an unconventional place for customers to be searching for information. In some cases, information may be available on the website but is not clearly marked or intuitively placed.

There is also limited information available about the levels of access to water. No city is required under their law to publish information about water shutoffs. No state law, local law, or utility regulations or policies, require the number of water shutoffs to be reported to the public. And, no utility voluntarily

publishes the number of monthly or annual water shutoffs, location of disconnections (i.e., the neighborhood), number of reconnections, or average length of disconnection. Using our utility survey, we were able to collect data on water shutoffs and other factors that demonstrate challenges in ensuring equitable access to water; however, it took months to collect. All five utilities indicate that they keep records of nonpayments and shut offs; therefore, it should be easy to publish this data periodically.⁵⁵ In fact, publishing this data would help identify areas of cities and states that require additional assistance, or potentially greater focus from local councils, nonprofits, and utilities. Full transparency would also help the utility to better engage ratepayers to have more effective discussions about works, rates, and needs of the overall community. In other words, shut off data could help jumpstart assistance and action in the community.

A stylized graphic of a water pipe system. It features a horizontal pipe at the top, a vertical pipe on the left, and a horizontal pipe at the bottom. The pipes are light blue with darker blue joints. A quote is placed inside the horizontal pipe at the bottom, and the attribution is to the right of the pipe.

“I am a veteran, and I went to war to fight for this country. I’m not looking for a handout, but water is a basic necessity that’s not affordable for low-income people. These are the things that I went to war for, and I can’t even afford. Please help.”

-K.A., Detroit, MI

HOUSEHOLD SURVEYS

By partnering with Community Action Agencies (CAAs) and local organizations in these six cities, we were able to reach households. Households experience first-hand the impact of the law and how utilities decide to exercise the authority given to them by the law. Therefore, better understanding these households' circumstances and how the law is used toward them is critical to ensure greater access to water. There were several interesting conclusions we can draw from the households surveyed.⁵⁶

1

Households feel a wide range of emotions when they experience a water shut-off and face different fears when their water is shut off.

Experiencing a water shutoff takes an emotional and physical toll on families. Households express feeling a wide range of emotions when their water was shut off. Households say they feel depressed, horrible, devastated, desperate, unsanitary, frustrated, anxious, hopeless, helpless, sad, scared, terrible, and ashamed. They worry about how they will cook, shower, use the toilet, get rid of germs and viruses, and stay clean. They worry about their kids, the health and well-being of their family, and how to pay the overdue bill. These families get water from the grocery store and turn to family and friends for help. One household in Detroit is "too ashamed to say" where they got water.

2

Water bills are a priority to pay for most families.

Households who participated in the survey were asked to order a list of bills to pay from the first bill they would pay to the last bill they would pay if they did not have enough money. The eight bills to order

included: car payment, cell phone, electricity, health insurance, heat, internet, rent/mortgage, and water. Most households place either their rent/mortgage or electricity bill first. The water bill often comes third in the ranking, making having access to water a priority for households. Households face different challenges in paying their monthly bills. Some households who can pay other bills, such as rent or electricity, cannot pay their water bills. Other households cannot pay either their water bills or their other bills. When financial resources are limited, households prioritize paying their water bill.

DO YOU PAY YOUR WATER BILL FIRST?					
City	Pay 1st	Pay 2nd	Pay 3rd	Pay 4th	Total Responses
Detroit	10	14	46	33	147
El Paso	5	17	24	9	77
Richmond	1	7	17	5	32
St. Louis	0	5	6	3	18

Households explain how they make their decisions to rank bills differently. Several households say they base their rankings on what is most necessary or what they need the most. Many households explained in different ways how rent is the most important expense: rent is most important, if you don't pay rent there is no point in paying other expenses, you need a roof over your head, or need shelter for kids. Some households do not pay certain expenses, such as housing, car payments, or health insurance because those expenses are covered by other assistance programs or they do not have those expenses, and therefore, rank those lower.

The needs of children are a significant factor in determining how expenses are prioritized. Kids are cited as motivating certain decisions about the car payment (car is needed to take the kids to work), shelter (to keep a roof over their head), and water (to keep them clean).

Households make decisions based on the money they have that month. They pay what they can, or they pay the bills that are most likely to be cut off first or for which they have received a disconnection notice first. Others pay a little off of the overdue bills or divide the money they have across the different bills. Households state they also call and ask for extensions on deadlines.

The season also factors into their decision-making. Households that mention seasonal priorities or prioritize heating or electricity mention the cold, but do not mention the heat. However, it is mentioned that electricity is important because of how many things in the home only function because of it. Also, cell phone, car, and Internet bills are often said to be important for employment.

3

Most households surveyed who were disconnected or received a disconnection notice do not receive water rate assistance but do receive other types of assistance.

The majority of households who participated in the survey whose water services had been disconnected or who had received a disconnection notice do not receive water assistance. When examining survey responses, it became apparent that many of the homes who have had their water services disconnected or who have received a disconnection notice receive other forms of assistance—for housing, food, or other utility services—but not water assistance. Based on the small sample size, it can be suggested that households who may be eligible and may need water assistance are not receiving water assistance.

4

Some households owe a lot of money to the utility and have experienced extended periods of time without access to water.

Many of the households who have experienced a water shutoff or who have received a disconnection notice owe money to the utility. The highest amount owed to the utility among survey respondents was \$5,000 for a household in Detroit, \$828.52 for a household in El Paso, \$5,000 for a household in Richmond, and \$1000 for a household in St. Louis. Across the five cities, all of the households who have experienced a water shutoff still owe money to the utility. As a result of these debts and being unable to pay, many households have also experienced water shutoffs. For some households, the experience of a water shut off lasts one or two days. Other households experience a much longer water shutoff. The longest period of water shut off includes four months in Detroit, two weeks in El Paso, three months in Richmond, and one month in St. Louis.

5

A slim majority of households believe their water is safe to drink.

Only a slim majority of participants believe their water is safe to drink across the four cities. While our sample size was small compared to the relative size of the city, the conclusions track with other studies that have been conducted. According to a study of federal survey data, almost 20% of adults in the United States say they do not drink tap water. That percentage is higher with minority adults. 35% of Black adults and 38% of Hispanic adults say they do not drink tap water.⁵⁷ It is unclear how well-publicized drinking water contamination crises in Flint, Benton Harbor and Toledo have affected perceptions of the safety and quality of drinking water in other communities.

I BELIEVE MY WATER IS SAFE TO DRINK. TRUE OR FALSE?

City	Responses	% “False”	% “True”
Detroit	150	41%	59%
El Paso	79	44%	56%
Richmond	32	41%	59%
St. Louis ⁵⁹	18	33%	67%

RECOMMENDATIONS

This benchmark should be used to identify which communities experience the greatest risk of losing access to water and to track progress in advancing equitable, permanent gains to access to water and sanitation.

The risk to our access to water will remain hidden and untrackable without a benchmark. We need a clear metric that defines success, identifies at-risk communities, and tracks progress in order to ensure that households have, get, and keep access to water. The benchmark provides the first method by which to gauge which communities have or do not have access to water and which households are at risk of losing access to water. The law as written plays an essential role in creating rules that improve or frustrate a communities' chances at having and keeping access to water. And the law as practiced determines whether the law is having the desired impact of giving and maintaining access. The shortcomings of the law and the state of access to water need to be on full display to ensure that households get and keep access to water. Otherwise, there is no clear indication that there is a problem, no clear plan for protecting access, and no way to demand accountability and change.

The AWAS benchmark as applied in this report focuses on economic access. The application of the benchmark shines a light on the laws that make it harder for low-income households to maintain access to water, and the role the law in advancing or undermining equitable access to water. Ultimately, the AWAS benchmark will take a nuanced approach to measuring access to drinking water, examining multiple indicators across four elements—water resources availability, household infrastructure, service quality, and economic access. Each element is necessary for achieving access to water. The final benchmark will comprehensively illustrate the threats to a household receiving drinking water across these elements.

State or local law must prohibit water shutoffs against low-income households.

We, as individual communities and as a country, must make the choice to protect low-income households' access to water when those households are unable to pay. It is our choice. We can choose to change the system, to limit through the law when utilities can shut off water for an inability to pay their water bills. Inability to pay should not be a reason for denying a household access to water. Where the legislature does not act to prohibit water shutoffs, utilities can and should take the lead in adopting internal policies which prohibit water shutoffs against low-income households.

Some utilities will feel that water shutoffs are a necessary part of the system. Many utilities express concern that prohibiting shut-offs will encourage low-income households not to pay, by taking away the utility's primary means of enforcing payment. They also express concern over their budget, the need to be able to pay operation, maintenance, and capital improvement expenses, and that everyone should pay their fair share of a service. Where a utility is unable to choose to completely prohibit water shutoffs against low-income households, there are a few alternatives that provide protections to low-income households. These concerns should be openly expressed and should be the starting point for communities to find solutions. Hidden problems cannot be fixed. Changing the discussion should be our first step.

In any event, there are steps that communities can explore to address these economic access issues. First, communities should ensure that utilities offer either a payment plan or rate assistance or both to a low-income household who is unable to pay, and offer it before services are terminated. Ideally, enrollment in a payment plan or rate assistance would be automatic. However, utilities typically do not have access to household income information, requiring extra steps. Second, payment plans and rate assistance need to be tailored to individual households in order for them to provide sufficient financial help. If a payment plan is offered without a discussion with the household, the payment plan may not offer monthly payments that the household can actually pay, especially when added to existing monthly bills. Third, rate assistance should be sufficient to defray enough of either outstanding or anticipated future costs to place repayment within reach. Non-automated contact with threatened households may lead to more appropriate assistance packages that help both the household and the utility in the short and long term. Communities can and should encourage their utilities to explore these options, and to identify how communities can support rate structures that allow equal protections for all.

Second, utilities can adopt more nuanced rules that govern water shutoffs. Affordability research often suggests that households should not be required to pay more than 3-5% of their income on water and wastewater bills. Therefore, utilities could cap charges for all households at 3-5% of household income, eliminating shutoffs for these families. In practice, if a household's annual income is \$25,000, the household would not be required to pay more than \$1250 or 5% of their income every year for water services.⁵⁸ If their monthly bill exceeded \$104, and the household was unable to pay that additional amount, utilities could refrain from terminating services for nonpayment of that additional amount over \$104. The challenge is that while 5% of a household's income may seem "affordable", that designation still does not guarantee that the household can pay the bill. The designation is somewhat arbitrary. Therefore, this approach could lead to the same number of shutoffs if a household's unique ability to pay is not considered when developing a payment plan and assistance package. This may mean that the best option in the

end is to end water shutoffs for qualifying low-income households. Without this limitation, households will continue to face the threat of water being taken away. Again, the choice is ours.

Punitive fees for late or nonpayment should not be charged against low-income households.

The law should prohibit the application of late fees or charges against low-income households who are unable to pay their bills. These households are already struggling with insufficient financial resources to pay their water or wastewater bill; that's why they do not pay. The addition of additional fees—such as late fees, interest on late or unpaid bills, disconnection fees and reconnection fees—simply punishes these low-income households for being poor. Because nonpayment in these circumstances is not a choice, these fees and charges do not incentivize payment. They only serve to make it harder for a household to maintain service connections or regain service connection. Communities and utilities should make the choice to prohibit fees from being charged against low-income households for late payment or nonpayment of water or wastewater bills.

The law should prohibit indefinite water shutoffs for water leakages on the property of low-income households.

Water leaks represent a waste of resources; therefore, they cannot go unresolved. Often the law allows for water services to be shut off until water leakages on private property are resolved. The challenge is that low-income households may not be able to afford the fixes required to eliminate the water leakages, yet they also cannot be denied water indefinitely. Therefore, the law should prohibit indefinite water shutoffs for water leakages on the property of low-income households. Furthermore, the law should require that low-interest financing be offered to low-income households to cover the costs of the repairs necessary to resolve the water leakages. Therefore, low-income households have a way to apply for funding to resolve the leakage issue when they may otherwise not have access to another source of capital. Grants should also be offered to defray some or all of the cost of repairs. Access to grants can be prioritized based on income level and the severity of the leak to ensure that what will likely be a limited source of funding is available to the most in-need households. Grants should be offered for two reasons. First, there are leaks—called non-revenue water losses—throughout the entire drinking water distribution system and it is not fair to hold households to a higher standard than the utility itself. On average, utilities experience a 10-30% rate of non-revenue water loss. The repercussions from such leaks are financial and resource wastage; however, municipal bonds and other financing are not denied, water resources withdrawals are not terminated, and staff are not fired until the leaks in the municipally owned sections are resolved. Second, the entire system benefits when leaks at the household level are resolved. Water leaks represent a waste of water, energy, and financial resources. Therefore, the system and community benefit from the elimination of leaks at the household level.

Foreclosures on homes on the basis of just water and wastewater liens should be prohibited.

Losing your home is a significant consequence that is disproportionate to the cost of unpaid water and wastewater bills alone. Foreclosures on the basis of just water and wastewater bills should be prohibited. Furthermore, liens placed on a home should only reflect the cost of the unpaid water and wastewater bills. No fees such as late fees, interest, or reconnection or disconnection fees should be allowed to be included in a lien. Lastly, should a lien be placed on the property for unpaid water and wastewater bills, rate assistance dollars should be available to pay off those debts.

Utilities should choose to be more transparent with their operations and communities should choose to be more active in understanding how their utility operates.

Utilities should publish certain data that is currently not publicly available and currently not required to be published by the utility. Water and wastewater utilities are important institutions within communities. Ratepayers should be viewed as the shareholders and investors in the water and wastewater utilities. Water and wastewater utilities are both funded by ratepayers and provide services to those ratepayers, who depend on the safety of the services to protect their health and community. Therefore, there is certain information that should be readily available to customers that is currently not available. This information includes:

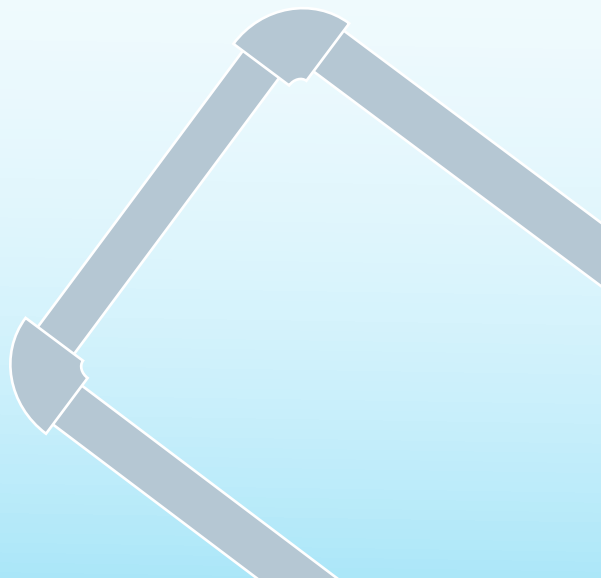
- the number of residential water shutoffs and distribution of water shutoffs by property location within the utility's service areas, monthly
- the number of residential accounts eligible for shut off, monthly
- the number of commercial account water shutoffs, monthly
- the number of commercial accounts eligible for shut off, monthly
- the amount collected from any fees charged for late payment or nonpayment, annually
- a water shutoff policy detailing the process and procedures for addressing accounts paid late or unpaid accounts, including how the utility must make contact with the customer, how many times the utility must make contact, the information that must be provided to contacts, the procedure for applying for rate assistance and the rules of how much rate assistance can be provided, the procedure for negotiating a payment plan, and an explanation of the costs incurred by the utility for managing unpaid accounts and accounts paid late (e.g. how much it costs to disconnect services and how that number is calculated).

Utilities should be transparent with how they operate their system and the impact their decisions have on households', particularly financially vulnerable households, access to water.

The utilities should have a designated webpage where all of this information is available. Two pages are critically important for a utility to have: one page where the utility's policy about water shutoffs is clearly stated, including any necessary contact information (both a phone number and email address), and a second page where information about the "state of water access" can be found to ensure accountability and transparency. Utility websites are often challenging to navigate. Information is often not available, is incomplete, or is difficult to find. The harder it is for information to be found about how to deal with an existing water shutoff, a pending water shutoff, or an inability to pay a water or wastewater bill, the harder it is for a customer to be reconnected, to prevent a water shutoff, and to proactively address the financial challenge they are facing. Understanding your bills and the options available to you should not be a guessing game, nor should communities want it to be.

To drive a more effective conversation about our utilities' needs, information about water shutoffs and access to water that is already being collected by the utility should be shared with the community. Additionally, utilities already have formal policies for how it responds to late payments and nonpayments. Making this available online should be easy and would help create greater trust and understanding about how the utility operates.

Utilities should also provide greater financial information on its website to make the management of the utility a more inclusive community endeavor. Utilities should publish each year's annual budget on its website so that customers can understand the financial strength and needs of the utility. This includes being able to see what types of costs are incurred by the utilities for operation, maintenance, capital improvement, and debt management, as well as the sources of revenue to cover those costs, and whether the revenue is sufficient to cover the costs. There should also be an accessible explanation of how water and wastewater rates are calculated. By enabling customers, i.e., shareholders, to better understand the service they are receiving and the reason their rate is what it is, they will be more informed and more willing to invest in the service they are receiving.



OUR NEXT STEPS

There is no more important goal than ensuring that each and every household has access to water and sanitation. Guaranteeing universal access to water and sanitation starts with defining success, identifying at-risk communities, and continuously tracking progress in order to make sure that any gains are kept, and shortcomings are addressed. The American Water Access Survey (AWAS) allows communities and governments to bring out of the shadows the threats to water access and address them head on.

This tool should be used by Federal, State, and local governmental agencies and legislatures to identify where the greatest risks to access to water and sanitation are across the United States. Conducting the AWAS provides an opportunity to determine whether the laws and decision-making stemming from the law has put access to water at risk. The results from AWAS can be used to inform the adoption of new laws to protect access to water.

The AWAS approach can also be used to inform determinations about funding allocations to ensure that communities with the greatest need and at the greatest risk not having or losing access to water can get or keep access to water. The tool should be used by utilities to assess how the decisions they make based on the discretion given to them by the law facilitates or frustrates families maintaining access to water. AWAS should also be used by organizations to hold state and local governments and utilities accountable to their customers and investors.

We have three next steps:

1. Discuss the results from the first application of the AWAS with the relevant state and local governments, utilities and community action agencies for the six cities,
2. Finish the development of the AWAS to reflect and account for the multiple threats to access to water, including launching the Water Access Alliance to advise on the further development of the AWAS, and
3. Expand the application of the AWAS to other cities across the United States and create an international edition.

Use the AWAS to bring about change.

We developed the AWAS to provide clarity of purpose, raise awareness, and generate change. The AWAS provides clarity to the concept of access by identifying the specific criteria that demonstrate a household's risk of losing access to water and therefore what it means to actually have access to water or not have access to water. By setting forth an actionable definition of access to water, the AWAS makes access to water a meaningful concept. The more meaningful and tangible the concept, the more people understand what is at stake and what needs to be done. The AWAS was created to drive change and encourage cooperation. By providing a clear target and standard for what is needed to achieve access to water and illustrating the risk levels of communities, stakeholders and advocates have a tool for making change and driving much-needed and long-awaited discussions. The AWAS opens the door for solution-driven conversations to ensure every household has and keeps access to water. We will be bringing these conclusions to the state and local governments, utilities and CAAs to discuss the findings and explore opportunities for taking steps to secure greater access to water.

Complete the development of the AWAS to reflect all that it takes to guarantee access to water.

This economic access report was just the first step in developing and implementing the American Water Access Survey. The threats to our access to water come from many directions. The survey will be further developed to reflect those multiple threats and ensure that we are protecting what we need to have in

JOIN THE WATER ACCESS ALLIANCE!

As we continue to develop the AWAS, we are seeking members for the new Water Access Alliance (WAA). The WAA will be composed of advisors with different expertises and experiences who can provide insight and feedback on the existing AWAS and future drafts of the expanded AWAS. This WAA will help us think through the different criteria that indicate whether a household is at risk of losing access to water. Should you wish to join this effort, please use the QR code or visit our website at www.ourwatersecurity.org to register your interest.



order to have access to water. In addition to economic access, we need three things to have access to water, including: 1. sufficient water resources, 2. infrastructure and good quality infrastructure to deliver water and sanitation services, and 3. good quality water resources and good quality drinking water. The next iteration of the AWAS will reflect all of these needs. With this level of comprehensiveness, the AWAS will enable communities to proactively and comprehensively act to truly protect access to water. The survey will also be further developed to reflect how a household receives services.

This report focused on households that receive water and sanitation services from a utility who conducts a service for a network. However, households also provide their own services. Some households receive drinking water from a well on their property. Other households have septic tanks and other on-site methods to collect and contain, and possibly treat, wastewater and solid fecal waste. These households' challenges are different than households who receive services from a utility, but no less threatening to their access to water. Due to the COVID-19 pandemic, our ability to fully engage communities was limited. With future iterations, we expect this will change.

Work with more communities.

As we continue to develop the AWAS, we will identify the next group of communities with which to work. Different communities face different challenges to their access to water. Some low-income households face water shutoffs for not being able to pay their water and wastewater bills. Some face water scarcity and a declining supply of water resources. Others face greater threats from natural disasters that take water and wastewater utilities offline. Still others face unsafe drinking water as a result of more polluted water resources or faulty infrastructure. We want state and local governments, utilities, and communities to feel empowered to face the challenges, to adopt the necessary laws, and to make the decisions that will protect access to water for all households. Work with us to ensure that each and every household has, gets, and keeps access to water.



ACKNOWLEDGMENTS

We would like to thank the community action agencies and nonprofits who worked with us to distribute and promote our survey. It was because of their partnership and support that we were able to reach households. Thank you Step Forward in Cleveland, Ohio; We the People of Detroit, Wayne Metropolitan Community Action Agency and, Freshwater Future in Detroit, Michigan; Project Bravo in El Paso, Texas; the Capital Area Partnership Uplifting People (CAPUP) in Richmond, Virginia; Socialization Services in Shreveport, Louisiana; and the Urban League of Metropolitan St. Louis, Inc. in St. Louis, Missouri.

A special thank you to the more than 300 households who completed the survey and trusted their story and experiences with us all to help improve their community. We were moved by your honesty and your words of encouragement.

Thank you to the utilities who completed our survey: Cleveland Water, Detroit Water and Sewerage Department (DWSD), El Paso Water, City of Richmond Water Utility, Shreveport Water & Sewerage Department, and the City of St. Louis Water Division. We appreciate their willingness to engage.

NOTES

1. All six utilities are owned and operated by the city government and are therefore public utilities.
2. The following number of households participated in the survey: Cleveland, 1; Detroit, 169; El Paso, 81; Richmond, 32; and St. Louis, 18 as of Friday February 11, 2022. Ten of the responses in El Paso are from customers who do not receive services from El Paso Water. They receive services from Anthony TX Water, Horizon Mudd Water, Lower Valley Water District, or do not identify the service provider. Nineteen of the responses in Detroit are from customers who do not receive services from the Detroit Water & Sewerage Department. They receive services from other providers in Michigan or receive services in states other than Michigan. In presenting the household survey data results, we typically include and consider responses from customers from other providers, especially when the question is not specific to a service provider. Shreveport distributed the survey for the first time the week of February 7, 2022; at the time of publication, we have not received any survey responses.
3. Cleveland did not participate in the utility survey. To find answers to those utility survey questions for Cleveland we used publicly available FOIAs. Where available, we include that data. Sometimes we state data results in the form of “X” out of 5 utilities to indicate that information is only available on that specific topic from the five utilities who participated in the utility survey, and not Cleveland.
4. Utility Survey Question #6. Cleveland FOIA C002024-122120, *see* notice and letter.
5. Utility Survey Question #13.
6. Utility Survey Question #8.
7. Findings, Part II.
8. Rule 24.1.a.
9. As written, the “diligent effort” rule without additional guidance does not create a clear and justiciable standard. For example, sending a water shut off notice that includes a statement that payment plans are available with a contact number for DWSD, could potentially qualify as a “diligent effort.” Alternatively, a “diligent effort” could require DWSD to make actual contact with the customer and document all efforts made to negotiate a payment plan prior to shut-off. Based on this language, these must be “diligent efforts to *have* the customer pay” (emphasis added). However, in the case of low-income households any diligent effort to *have* a customer pay would need to include entering the customer into a reasonable payment plan or offering them rate assistance that would offset the amount they cannot pay, though rate assistance cannot be offered by DWSD based on state law. For a household without the financial resources to pay, there is no other way to “have” them pay. At a minimum, the rule does seem to require Detroit to indicate to the customer that a payment plan is available before shutting off water services.
10. Utility Survey Question #9.
11. Under the Headlee Amendment to the Michigan State Constitution, as interpreted by the *Bolt v. Lansing* decision, water rate assistance programs funded by ratepayers are prohibited. *Bolt v. Lansing*, 464 Mich. 854 (2001).
12. Utility Survey Question #18. Does not include Cleveland.
13. Utility Survey Question #19.
14. City of Cleveland Code of Ordinances §535.16. According to the Legal Aid Society of Cleveland, Cleveland Water also chooses to place a door hanger on the door of the property where services are to be shut off at least three days before the water shutoff. *Cleveland Water Department Shut-Offs and Water Review Board Hearings*, available at <https://laslev.org/cleveland-water-department-shut-offs-and-water-review-board-hearings/>.
15. Code of the City of Richmond, Sec. 28-53.
16. Code of the City of Richmond, Sec. 28-57.
17. Code of the City of Richmond, Sec. 28-57.
18. DWSD Rules and Procedures, 2003, Rule 6.2
19. DWSD, Rules and Procedures, 2003, Rule 19. The information provided on the website makes it harder to understand the timeline. The website states that “service interruptions procedures” will proceed once the bill remains unpaid by the due date stated in the Final Notice. It is not clear whether the “due date” is different from the “notice date” mentioned in the DWSD rules. However, the website seems to suggest that a termination can occur immediately, rather than in 10 days from the “notice date”, assuming that the “due date” and “notice date” are the same. City of Detroit, Detroit Water & Sewerage Department, *Customer Policies*, available at <https://detroitmi.gov/departments/water-and-sewerage-department/dwsd-customer-service/customer-policies>.
20. El Paso Water, *Overdue payment?*, available at https://www.epwater.org/customer_service/understanding_your_bill/overdue_payment.
21. City of St. Louis Water Division, *Frequently Asked Questions-Customer Service*, available at <https://www.stlwater.com/accounts-billing/faqs.php>.
22. The law does not explicitly allow a utility to charge interest or a late fee. The law also does not explicitly prohibit a utility from charging interest or a late fee. This raises the question: can a utility legally charge a late fee or charge interest on a late bill when they have not been explicitly granted the authority to charge the fee, but also not explicitly prohibited from charging the fee?
23. City of Detroit, Detroit Water & Sewerage Department, *Customer Policies*, Rule 5, available at <https://detroitmi.gov/departments/water-and-sewerage-department/dwsd-customer-service/customer-policies>.
24. City of Richmond, Charter, Sec. 28-26. This section also requires the Department to promulgate regulations to imple-

ment this section; however, no such regulations can be found.

25. City of Detroit Code, Sec. 48-1-2. The Board of Water Commissioners is required to set the disconnection fee. *Id.* Shreveport Code of Ordinances, Sec. 94-167.
26. Shreveport Code of Ordinances, Section 94-166(a)(6).
27. Shreveport Code of Ordinances, Section 94-167(b).
28. Code of City of St. Louis 23.06.130
29. This practice, and its alleged discriminatory application to majority-black communities is the basis of a lawsuit that has been filed by the NAACP against the City of Cleveland in December 2019. NAACP LDF, *Water/Color: A Study Of Race And The Water Affordability Crisis In America's Cities*, available at <https://www.naacpldf.org/our-thinking/issue-report/economic-justice/water-color-a-study-of-race-and-the-water-affordability-crisis-in-americas-cities/> and NAACP LDF, *LDF Files Lawsuit Against the City of Cleveland to Address Discriminatory Water Liens and Shutoffs*, available at <https://www.naacpldf.org/press-release/ldf-files-lawsuit-against-the-city-of-cleveland-to-address-discriminatory-water-liens-and-shutoffs/>.
30. Detroit Water & Sewerage Department utility survey responses.
31. Detroit Water & Sewerage Department utility survey responses.
32. Ohio state law allows for a water department to send an unpaid water account to the county treasurer's office, whereby the county treasurer adds an assessment or lien on the tax bill of the property. Ohio Revised Code, Section 743.04, available at <https://codes.ohio.gov/ohio-revised-code/chapter-743>. City of Detroit City Code, Sec. 48-1-41-42. City of Detroit Charter 7-1201. City of Richmond, Charter, Sec. 28-66. City of St. Louis Code Section 23.06.170.
33. City of Richmond Charter, Sec. 28-66.
34. City of St. Louis Code Section 23.06.170..
35. City of Detroit Code, Sec. 48-1-41-42.
36. Texas Local Government Code Section 552.0025(d).
37. Utility Survey Question #20 (payment plans). Cleveland FOIA C000417-022221. Utility Survey Question #21 (rate assistance). Cleveland FOIA C000417-022221.
38. Utility Survey Question #22.
39. City of Shreveport, *Payment Assistance*, available at <https://www.shreveportla.gov/2375/Payment-Assistance>.
40. City of St. Louis Water Division, *Frequently Asked Questions-Customer Service*, available at <https://web2.stlwater.com/accounts-billing/faqs.php#forget>
41. Utility Survey Question #23.
42. Utility Survey Question #24. We were not sure what this meant and sought clarification; however, no response was received.
43. Utility Survey Question #24, and email from Bryan Peckinpugh, Public Affairs Director, Detroit Water & Sewerage Department. Detroit noted that extra outreach efforts have been made since 2014 to make sure customers know about the assistance programs, but that it is still up to the customer to apply for the program(s).
44. *Id.*
45. Utility Survey Question #22.
46. Utility Survey Question #24.
47. City of Richmond Code of Ordinances, Section 28-275, 28-303.
48. *Navigating Legal Pathways to Rate-Funded Customer Assistance Programs* (2017), available at <https://efc.sog.unc.edu/wp-content/uploads/sites/1172/2021/06/Navigating-Pathways-to-Rate-Funded-CAPs.pdf>. GLELC, *Legal Pathways to Income-Based Drinking Water Rates in Michigan* (2020), available at <https://www.nwf.org/-/media/Documents/PDFs/NWF-Reports/2020/Legal-Pathways-to-Income-Based-Drinking-Water-Rates-in-Michigan.ashx>. *Bolt v. Lansing*, 464 Mich. 854 (2001).
49. *Id.*
50. Utility Survey Question #25. Neither utility indicates from whom they receive donations.
51. EP Water does not further specify in its utility survey response from which local agencies they receive checks.
52. City of Detroit Charter, Section 7-1203.
53. City of Shreveport Charter, Section 12-03.
54. City of Shreveport Charter, Code of Ordinances, Section 94-168(11).
55. Utility Survey Question #15.
56. As a reminder, the following number of households participated in the survey: Cleveland, 1; Detroit, 169; El Paso, 81; Richmond, 32; and St. Louis, 18 as of Friday February 11, 2022. The conclusions presented here are based on the survey responses. Through the analysis within this section, we refer to the results of four cities because there was only 1 participant in Cleveland.
57. AP News, *US pushes for better tap water but must win over wary public* (January 30, 2022), available at <https://apnews.com/article/environment-and-nature-michigan-water-quality-flint-b843f813f3fea5eddd43d10181204b054>.
58. The structure could also build in an additional level of equity. For example, households at 50% of the Federal Poverty Level (FPL) would be expected to pay 3% of their income toward water and wastewater bills, while a household at 75% FPL would pay 4%, and households at 100% and 150% FPL would pay 5%.
59. The city of St. Louis has two water providers, so these numbers reflect both water providers and are not disaggregated.



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