

REPORT

TURN ON THE TAP:

INCREASING PARTICIPATION IN WATER AFFORDABILITY PROGRAMS THROUGH DATA SHARING



AUTHORS:

Larry Levine, NRDC
Olivia Wein, NCLC

Research Assistant:

Kenneth Thomas

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Interviewees:

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Susan Crosby, City of Philadelphia Department of Revenue

Kaileigh Murphy, City of Philadelphia Department of Revenue

James Moore, City of Philadelphia Office of Integrated Data for Evidence and Action

Cassandra Henderson, City of Philadelphia Office of Integrated Data for Evidence and Action

Albert Kramer, New York City Department of Environmental Protection

Heather Sackett, City of Westminster Public Works and Utilities

Elizabeth Marx, Pennsylvania Utility Law Project

Laurie Wheelock, Public Utility Law Project of New York

Fidel Ekhelar, New Jersey Department of Community Affairs

Robert Ballenger, Community Legal Services of Philadelphia

Charlie Harak, National Consumer Law Center

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EXECUTIVE SUMMARY

This report is for anyone advocating for or implementing low-income water affordability or assistance programs, including advocates, utilities, cities, states, and utility regulators. These programs often struggle with low enrollment due to barriers in the application process. Data sharing with other types of low-income programs is a uniquely effective method for dramatically increasing enrollment.

In this report, we explore how low-income water affordability and assistance programs around the country are using this approach to increase participation, by making the application process easier and faster—or even by eliminating the need for many households to submit an application. Additionally, for program administrators, we show how data sharing can reduce staff time needed to review and approve applications and lower the amount of data that has to be maintained on program participants.

In some cases, programs have used data sharing to add tens of thousands of new participants in a single city in less than a year, or to achieve participation rates above 70 percent of all eligible households across large regions of a state.

Our case studies show that there is no single best way or right way to design a successful data sharing arrangement. For example, some data sources may be easier to access than others. Moreover, programs may record participants' data in

different ways, which may affect whether data sharing can be readily automated or is best done manually, at least at first.

However, there are many common features of successful data sharing arrangements: leadership and a commitment to finding ways to streamline the enrollment process; identification of other programs with similar goals and a better enrollment rate that serve substantially the same population; finding partners in agencies willing to collaborate and commit to a process of working through the details; and looking for opportunities to take advantage of system upgrades or other opportunities to improve the data sharing process over time. Data sharing can be mandated by legislation or by state utility commissions, or it can be self-initiated by program administrators. Finally, while data sharing can enroll a substantial percentage of eligible households, it remains important to provide alternative ways to apply to the program—sometimes referred to as having “no wrong door” to enter.



I. INTRODUCTION

Water is an essential service, but for too many Americans, the water bill is unaffordable. The U.S. Environmental Protection Agency has estimated that 12 to 19 million low-income households (9.2 percent to 14.6 percent of all U.S. households) face unaffordable water bills.¹

Programs that provide ongoing water bill discounts for low-income households are a critical part of the solution. As water rates continue to rise all around the country, there is a growing interest in expanding the availability of these programs. (See the “What is a low-income water discount program?” box for a description of the various types of offerings.)

Although some water and wastewater utilities offer low-income discount programs, most do not.² Where programs do exist, they often struggle with low participation rates. According to one estimate, utility-level water assistance programs often reach only 10 to 15 percent of potentially eligible households.³

Many utilities, community and environmental advocates, and others seek to create new local programs and improve existing ones—and, even more ambitiously, to create permanent statewide and federal programs. For these programs to succeed, they must not only be well designed “on paper” but must also reach as many eligible households as possible in their execution.

This report addresses a widely observed, practical constraint on enrollment in low-income water discounts: the administrative burden placed on the households seeking to participate.⁴ In short, applications often are complex and require extensive documentation, deterring participation. Each additional step—from becoming aware of the program and its application requirements, to gathering documents containing sensitive information, to having technologies and skills to upload documentation—creates a barrier to entry for some of the most vulnerable households in our communities. Removing administrative burdens in the application process is an essential strategy for increasing enrollment in low-income discount programs.⁵

One uniquely effective way for low-income water discount programs to increase their participation rates involves sharing data with other income-based social services programs (referred to herein as “partner programs”). Through data sharing, low-income water discount programs can identify and enroll income-eligible households based, in whole or in part, on income and other information that customers have *already* shared with partner programs in which they participate.

WHAT IS A LOW-INCOME WATER DISCOUNT PROGRAM?

For purposes of this report, “low-income discount program” refers to any program that provides bill discounts, credits, or discounted rates to low-income households on their water and/or wastewater bills, *on a recurring basis* (e.g., on every monthly or quarterly bill, or as an annual bill credit). It does not include “crisis assistance” programs, which provide temporary help to pay overdue bills.

Low-income discount programs can be funded in many different ways, including at the individual utility level or at the state or federal level. Regardless of the funding source, tasks such as outreach, application processing and enrollment, and distribution of funds may be the responsibility of an individual utility, a nonprofit organization, a state or federal agency, or some combination of these.

Low-income discounts can be designed in various ways.⁶ The primary approaches include:

- a flat dollar-amount discount on each bill;
- a percentage discount on each bill; or
- a program that caps participating households’ water bills at a predetermined percentage of household income that is deemed to be affordable.

NRDC and NCLC’s *Water Affordability Advocacy Toolkit* provides a detailed discussion of these various program design options, as well as examples from around the country.⁷ As the *Toolkit* explains, they are all sometimes referred to interchangeably as “affordability programs” or “assistance programs.” For many water advocates, however, these terms mean quite different things. Percentage-of-income approaches (such as in the Philadelphia case study in Part IV of this report) are considered “affordability” programs because they tailor the size of the discount to achieve an affordable bill for each household. In contrast, other forms of discounts are considered “assistance” programs because the size of the discount is determined without regard to how large the individual household’s remaining bill will be, and without regard to whether the household can afford that amount given its income.

From the household's point of view, data sharing reduces administrative burden by minimizing the amount of documentation it must submit with an application—or even eliminate the need to submit an application at all. This is also likely to speed up the enrollment process, allowing eligible households to benefit from the program more quickly. For the low-income water discount program administrator, data sharing can decrease the costs and staff time spent on outreach, intake, and eligibility determinations. It can also increase program integrity (the efficient operation of a program, per its goals and rules) and minimize the amount of sensitive personal documentation the program must collect and securely retain. At its best, data sharing can enable programs to efficiently enroll a very large percentage of eligible customers.

This report explores how low-income water discount programs can use data sharing, ranging from targeting customers for outreach to encourage applications, to automatically enrolling eligible customers in utility

assistance without the need even to submit an application. It highlights different ways data sharing can be accomplished, including low-tech and high-tech approaches. It also examines the range of partner programs and agencies that can be recruited into a data sharing effort.

Our work is based on a dozen case studies that illustrate the range of approaches to data sharing. Most of the case studies involve low-income water discount programs, but some focus on low-income energy assistance programs from which water programs can learn. Following the introduction, Parts II and III synthesize lessons learned from the case studies as a whole. Part IV provides the detailed case studies, including key takeaways for each one.

Successful data sharing requires a vision, a collaborative spirit, the right talent at the table with open lines of communication, and a commitment to improve over time. For anyone seeking to begin or expand a data sharing initiative, this report provides a head start.⁸



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II. DATA SHARING METHODS ARE NOT ONE-SIZE-FITS-ALL, BUT RATHER CAN BE ADAPTED TO FIT THE CONTEXT

Our case studies show that low-income water discount programs can use data sharing for several different purposes and with a wide range of partner programs—all in service of increasing program enrollment and decreasing administrative costs of program implementation. Here are some of the key features of data sharing, as revealed by the case studies.

LOW-INCOME WATER DISCOUNT PROGRAMS CAN SHARE DATA WITH A BROAD ARRAY OF NON-WATER PROGRAMS

Partners for data sharing can include state agencies, local agencies, and other utilities—any entity that plays a role in administering other means-tested programs and has relevant data on participants in those programs. Our case studies show a wide range of means-tested programs that participate in data sharing with low-income water (and energy) discount programs. These include:

- **Federally funded programs administered by states or counties.** Nearly all of the case studies involved one or more of these partner programs:
 - Low Income Home Energy Assistance Program (LIHEAP)
 - Low Income Household Water Assistance Program (LIHWAP)⁹
 - Supplemental Nutrition Assistance Program (SNAP)
 - Temporary Assistance for Needy Families (TANF)
 - Medicaid
 - Children’s Health Insurance Program (CHIP)
- **Local programs** (see Philadelphia and New York City case studies)
 - Property tax credit programs
 - Health, human services, and public safety programs
- **Ratepayer-funded energy assistance programs** (see California case study)
- **Other state-funded programs** (see Massachusetts and New Jersey case studies)
 - Subsidized health insurance
 - Miscellaneous cash assistance programs (sometimes known as “general assistance”)
 - Programs for low-income seniors or individuals with disabilities

Low-income discount programs may share data with one partner program or with many. In some cases, data from multiple partner programs were already managed in a single database maintained by another state or city agency (see Philadelphia, New Jersey, Massachusetts, and Maryland case studies). Further, in one case study (Philadelphia), the city has an Office of Integrated Data Management that exists specifically to facilitate data sharing across programs; although most U.S. cities do not have such offices, some cities and states do have similar offices that a low-income discount program might be able to work with.¹⁰

LOW-INCOME WATER DISCOUNT PROGRAMS CAN USE DATA FROM OTHER INCOME-QUALIFIED PROGRAMS IN AT LEAST FOUR WAYS

The case studies reveal at least four ways in which low-income water (and energy) discount programs use customer data derived from other programs.

- **Automatic enrollment without the need to submit an application.** In many of the case studies, a low-income discount program and a partner program share data at a regular frequency (e.g., monthly, quarterly) and identify households that are eligible, enrolling them in the discount program automatically. Where shared data are sufficient to determine eligibility but some additional information is needed to complete enrollment, a program administrator may reach out to a household or its utility to request the missing information. At some point in the process, customers are informed that they are being enrolled and provided a chance to opt out.

WHAT IS AUTOMATIC ENROLLMENT?

Automatic enrollment occurs when a program enrolls eligible households without the need for them to submit an application. The program identifies these households on the basis of their participation in, and/or information included in their application for, another program. Automatic enrollment requires data sharing between the two programs.

Most of the case studies in this report involve low-income discount programs that use data sharing for automatic enrollment, although some use data sharing to facilitate enrollment in other ways. As discussed further below, when using automatic enrollment, it is especially important to *budget* for increased enrollment, to ensure that all eligible households identified through data sharing can be enrolled without diminishing the discount per household.

- **Targeted outreach:** Data sharing can help low-income water discount programs identify households that are (or are likely to be) eligible, based on their participation in a partner program, and undertake targeted outreach to encourage them to apply. This is less effective than automatic enrollment, but it may increase the number of eligible households that are aware of a program and interest more customers in applying. Since targeted outreach itself does not make the application process easier, it is best to pair it with a streamlined application process that waives income documentation requirements for people already participating in a partner program. However, in our case studies, even that approach met with mixed success. In some cases (Westminster and Pittsburgh), a relatively small proportion of targeted customers actually enrolled. However, another program (Virginia) used targeted outreach via text messaging to successfully distribute available funds for water debt relief.
- **Verifying applicants' eligibility.** In some programs, income documentation requirements are waived if an applicant participates in certain other means-tested programs (an approach known as “categorical eligibility”), but customers still must submit an application to enroll. In these cases, some households can still face challenges submitting documents to prove they participate in a categorical eligibility program—for example, technical or practical difficulties making photocopies to submit by mail or scanning and uploading documents electronically. To alleviate that burden, utility discount programs can verify a household's participation in a categorical eligibility program through data sharing. This can be done in tandem with targeted outreach to households that have already been identified as categorically eligible, as in the Virginia case study. Alternatively, a program may use data sharing to verify participation only after a household submits an application.
- **Flagging accounts for shutoff protections.** In one case study (Philadelphia), a water utility used data sharing to identify vulnerable households and automatically exempt them from shutoff. This includes not only low-income households but also households with seniors or children and households that are renters.

LOW-INCOME WATER DISCOUNT PROGRAMS CAN USE VARIOUS METHODS TO IDENTIFY “MATCHES” BETWEEN WATER CUSTOMER DATA AND THE PARTICIPANT DATA SHARED BY OTHER PROGRAMS

A low-income water discount program and the partner program typically negotiate a memorandum of agreement (MOA) that specifies the terms under which data will be shared. The MOA specifies which entity provides data and which one receives data, which specific data are provided and in what format, which entity performs the matching work to identify eligible customers, how frequently data are shared, what protocols are to be used to ensure privacy of personal information, and other terms. Matching can be done manually, or it can be automated. A hybrid approach can also be used.

These arrangements between programs can vary. For example, in some utility-run discount programs, a water utility provides customer data to the partner program, which then returns information identifying which of the utility's customers participate in the partner program (see the Philadelphia and Massachusetts case studies). In other utility-run discount programs, the partner program provides data to the utility on program participants that reside within the utility's service area, and the utility identifies which of those households are customers of the utility (see the Westminster, New York City, California, and Pennsylvania case studies).

In some cases, where enrollment in a utility discount program is handled by a state agency (such as the New Jersey, Maryland, Virginia, and Puerto Rico case studies), the agency obtains data on households participating in partner programs and uses it to determine eligibility, or likely eligibility, for the utility discount program. In some of these examples, utilities also share information that enables the state agency to identify and/or enroll eligible customers.

III. LESSONS LEARNED FROM CASE STUDIES

The case studies in this report reflect a range of data sharing approaches. Individually and as a group, they offer many lessons for low-income water discount programs seeking to increase enrollment through data sharing.

These are the key takeaways that emerge from the case studies as a whole:

- ***Data sharing can enable low-income water discount programs to dramatically increase participation—especially by automatically enrolling eligible households, without the need to submit an application.*** In our case studies, many of the programs using this approach showed very high participation rates (70 percent or more in some cases) and large, rapid increases in enrollment (e.g., adding tens of thousands of new participants in less than a year, which nearly tripled total enrollment). The same approach can be used to recertify participants' eligibility for re-enrollment in subsequent years, without the need to re-apply. For some programs that allow enrollment either automatically or by application, automatic enrollment accounted for a substantial majority of all participants.
- ***Low-income discount program staff can reach out to potential partner programs proactively to initiate data sharing efforts. Alternatively, new legislation, utility commission orders, or state or local elected officials can direct or encourage data sharing.*** In many cases, all it takes to get started is program staff or utility leaders, driven by a desire to improve program effectiveness, who build relationships with staff at potential partner programs that have a shared mission of supporting low-income residents. (Although state legislation provided a catalyst in some of our case studies, we did not identify any situations where new legislation would be *necessary* to authorize data sharing. Where utility commission-regulated utilities are involved, however, a commission order may be needed to authorize data sharing.)
- ***Data sharing can start with one partner program and expand to others over time.*** Where multiple potential partner programs already share an integrated data management system, this can provide a major head start.

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- ***Data sharing can occur among sister agencies within the same level of government, between two different levels of government, between government and nongovernment entities, or even between two nongovernment entities.*** Most existing low-income water discount programs are run by individual municipal water utilities, which may have unique opportunities to share data with other city government agencies. Similarly, state-run programs may share data with other state agencies or across multiple programs housed within the same agency. Many case studies, though, involve data sharing between municipal water utilities and state agencies, between privately owned utilities and states, or between energy utilities and water utilities (either publicly or privately owned).
- ***Data matching can be done manually (such as with spreadsheets), or it can be partially or fully automated.*** Some programs start with a simple, low-tech approach and shift toward more automation over time. In either case, successful data sharing efforts often include early and ongoing engagement with information technology staff.
- ***Programs participating in data sharing—both the water discount program and partner programs—can seek ways to improve their internal processes to make data sharing more efficient.*** For example, partner programs can amend their application forms to efficiently get their participants' consent to share data. Low-income water discount programs can take advantage of scheduled upgrades to billing or other information technology systems to modify their data management in ways that make data matching with partner programs easier.
- ***Automatic enrollment can work even if income eligibility thresholds are not perfectly aligned between partner programs or if the size of a water discount varies depending on income.*** The design of a low-income water discount may determine the type of data that needs to be shared. If a water discount program makes all participants in the partner program eligible to enroll and provides the same level of discount to all enrollees, the only information needed is whether a customer participates in a partner program. (See, for example, the New York City and Westminster case studies.) If a water discount program provides varying discount levels depending on the participant's income (see the Philadelphia, New Jersey, and Pennsylvania American Water case studies), or if the water discount program makes participants in a partner program eligible only if they fall below a certain income threshold, the partner program may need to provide some income-related data for each household. As a last resort, the water discount program may need to reach out to the household to request specific information, short of a full application.¹¹
- ***Successful data sharing does not require a perfect match of every data field between participating programs.*** Data fields will rarely be identical across multiple programs, but successful data sharing efforts find ways to work with the available data to make matches. In some cases, programs seek out missing information to confirm a match when needed.
- ***When adopting data sharing to increase participation in a low-income discount, it is important to budget for increased enrollment, to ensure that the program can provide the same discount to a larger number of households.*** This is especially important when using automatic enrollment, to make sure that all eligible households identified through data sharing can be enrolled without diminishing the discount per household. Some programs using automatic enrollment have a built-in mechanism to cover increased costs when enrollment rises, such as recouping costs from all ratepayers through a small surcharge on monthly bills.
- ***Where a state administers a low-income water assistance program, it can share data to help utilities enroll customers in the utilities' own low-income discount programs.*** Although water utilities typically would know which of their customers receive water bill assistance from a state program, data sharing can provide income information that the utility may need to assign customers the appropriate level of discount.
- ***When customer debt relief is a priority, aligning income eligibility limits across programs while sharing data on customers in arrears can be an efficient way to provide assistance.*** For example, if utilities share data on customers in arrears, a state can provide available water assistance funds to those who already participate in other means-tested programs.
- ***Data sharing efforts must take care to maintain the security of personally identifiable information, including obtaining appropriate consent from program participants to share their data.*** Low-income discount programs can negotiate agreements with partner programs to create a shared approach. States can provide guidelines or model agreements to facilitate this. In some cases, specific federal, state, or local rules may apply to data sharing arrangements, depending on which agency administers a program and whether it is federally funded. As noted above, partner programs may be able to amend their application forms to efficiently get their participants' consent to share data.
- ***Programs should always maintain the opportunity for households to apply directly and provide their own documentation of eligibility.*** While data sharing can enroll a substantial percentage of households falling below a program's income eligibility limit, it will never capture all of them. Therefore, it remains important to provide alternative ways to apply for the program—sometimes referred to as having “no wrong door” to enter.

IV. CASE STUDIES

Each of the case studies that follow describes a low-income water (or energy) discount program and the partner program(s) involved in data sharing; explains how the data sharing is used to facilitate enrollment; and identifies key takeaways. Many of the case studies include quantitative data showing how data sharing has increased program enrollment. The case studies include some low-income energy utility assistance programs because they can provide useful models for the water sector.

Interviews with program administrators, or with other directly involved stakeholders, informed most of the case studies. Case studies that draw on interviews often include information on what motivated program administrators to use data matching and how the effort evolved over time. Some case studies include links to sample data sharing agreements or guidelines (see California and Massachusetts).¹² Readers will also find additional information in the endnotes.

LIST OF CASE STUDIES



WATER

- **Philadelphia:** Coordination across city agencies for automatic enrollment and shutoff protections
- **New York City:** Municipal water utility sharing data with other city agencies



ENERGY

- **Westminster, Colorado:** Municipal water utility sharing data with a state-run energy assistance program
- **California:** Cross-enrollment between utility-run water and energy assistance programs
- **Pennsylvania:** Enrolling LIHWAP recipients in utility-run water assistance programs
- **Virginia and Puerto Rico:** Data sharing for rapid enrollment in LIHWAP
- **New York State:** Legislation requiring data sharing between state programs and utility-run assistance programs
- **Jackson, Mississippi:** Unsuccessful attempt at data sharing between municipal water system and a state agency, with an opportunity to try again
- **New Jersey:** Coordination between state agencies for automatic enrollment in energy assistance programs
- **Massachusetts:** Utility-run assistance programs sharing data with state programs
- **Maryland:** Legislation prompting data sharing for automatic enrollment in a state-run energy assistance program

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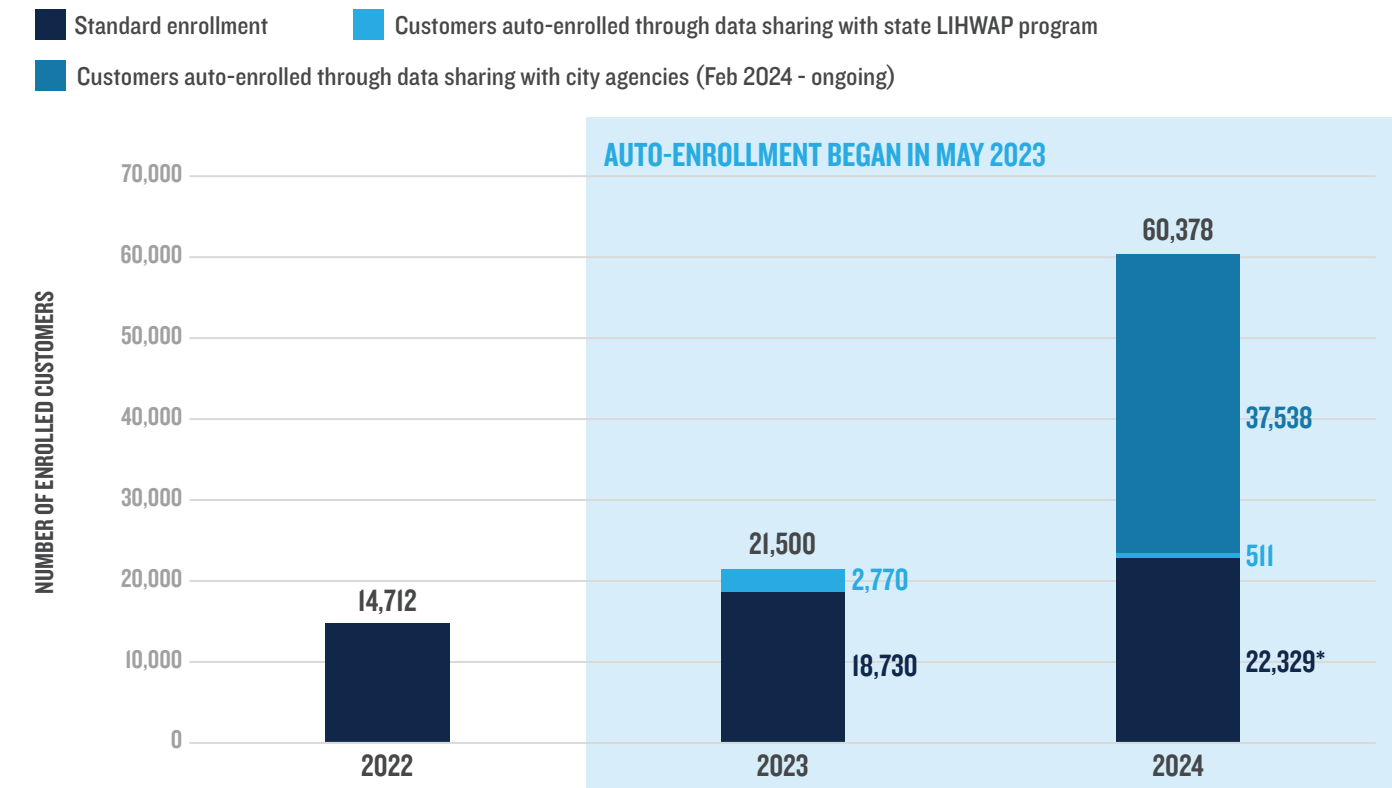
PHILADELPHIA: COORDINATION ACROSS CITY AGENCIES FOR AUTOMATIC ENROLLMENT AND SHUTOFF PROTECTIONS¹³

KEY TAKEAWAYS:

- Water affordability and assistance programs can dramatically increase participation by using data sharing to enroll customers without the need for applications. This can work even for tiered programs, in which the size of the discount depends on household income.
- Data sharing can be used to identify vulnerable households for protection from shutoff, as well as to enroll customers in bill discount programs.
- Where a city has existing systems for integrated data management across multiple city agencies or programs, a municipal water utility can use that system to participate in data sharing.
- Municipal water utilities can create new data sharing partnerships with state agencies to facilitate data sharing with state-run programs, even without an integrated cross-program data management system.
- When using data sharing to facilitate enrollment without the need for an application, low-income water discount programs can start with a limited pilot, sharing with only one other agency or program, and then expand on the basis of their initial experience.

The Philadelphia Water Department (PWD) has the nation’s most robust water affordability program, the Tiered Assistance Program (TAP). For eligible low-income customers, TAP caps combined water, wastewater, and stormwater bills at a certain percentage of household

FIGURE 1: ENROLLED CUSTOMERS IN PHILADELPHIA, PA



*May include some customers that entered into the program via auto-enrollment in 2023.

income. The program is “tiered” because the lowest-income participants pay the lowest percentage of income. Tiers are based on a customer’s household income and size. TAP participants’ bills are capped at 2 percent of household income if their income is at or below 50 percent of the Federal Poverty Level (FPL), 2.5 percent for those with incomes between 51 percent and 100 percent of the FPL, 3 percent for those with incomes between 101 percent and 150 percent of the FPL, and 4 percent for those with incomes above 150 percent of the FPL who are in the program due to a special hardship.¹⁴

The Philadelphia Department of Revenue’s Water Revenue Bureau (WRB), which serves as PWD’s agent for billing and collections, administers TAP.

The city launched TAP in 2017 and estimated that approximately 60,000 residential accounts would be eligible.¹⁵ To enroll and recertify, customers had to submit an application requiring multiple proofs of household income and residency. By the end of 2022, about 15,000 residential customers were participating in TAP.¹⁶

In mid 2022, PWD and WRB began using data matching to identify customers eligible for an exemption from water shutoff if they fell behind on their bills, after the city adopted a shutoff policy exempting low-income households from shutoff for nonpayment. To identify these customers, WRB shared its customer database with the city’s Office of Integrated Data for Evidence and Action (IDEA), which is housed within the city’s Managing Director’s Office. IDEA matched individual customer data to individual information in portions of its integrated “data warehouse,” which draws information from across “14 unique [City of Philadelphia] systems spanning health, human services, and public safety.”¹⁷ If a water customer qualified for the low-income shutoff exemption, IDEA flagged these accounts for WRB, which then exempted those customers from disconnection due to nonpayment. In 2022, this process “helped protect nearly 100,000 accounts (more than 18,000 of which would have otherwise been shutoff for non-payment during 2022).”¹⁸ In 2023, building on the previous year’s success, the city expanded the shutoff protection to include not only low-income households but also rental properties and households with seniors or children, which resulted in protections for a total of about 210,000 households.¹⁹

In 2023–2024, the city began using data sharing to enroll low-income customers in TAP without need for an application. Initially a pilot enrolled customers who had received water bill assistance under the temporary, federal Low Income Household Water Assistance Program (LIHWAP). The Pennsylvania Department of Health and Human Services (PA DHS), which administered LIHWAP, had LIHWAP participants’ consent to share data with other programs, conveyed via a check box on the LIHWAP application.²⁰ PA DHS developed a memorandum of agreement with the city to enable data sharing with WRB. The state provided data in a spreadsheet format on Philadelphia residents who participated in the program. WRB screened this list to remove any who did not meet TAP eligibility requirements.²¹

For the remaining customers, WRB used household size and income data to calculate household income as a percentage of FPL and enroll these customers in TAP with the appropriate tiered discount. Through this pilot, the city enrolled 3,218 households in TAP.²² At the end of 2023, TAP was reaching 21,500 customers.²³

In February 2024, WRB and IDEA initiated a larger-scale, ongoing data-matching program to enroll customers in TAP. The two city agencies refined the process they had previously used to flag customers for shutoff protection, focusing on low-income households.²⁴ Using data from other means-tested programs, IDEA provided WRB with income estimates for each household to enable enrollment in TAP based on estimated household size and estimated income of 133 percent of the FPL.

WRB describes the process as “pre-qualification,” rather than auto-enrollment, because every account that IDEA identifies as low income is still reviewed by WRB staff to confirm that the customer meets all other TAP eligibility criteria.²⁵ Those who qualify are enrolled without the need for an application. When customers are informed of their enrollment, they are provided an opportunity to opt out.²⁶

By the end of 2024, Philadelphia had nearly tripled the number of accounts enrolled in TAP, to 60,378.²⁷ This increase was due almost entirely to WRB’s and IDEA’s data sharing initiative, which enrolled 37,538 customers in TAP without the need to submit an application—accounting for 97 percent of the total increase in enrollment from December 2023 to December 2024.²⁸ The program does not have a fixed budget that limits enrollment because it is integrated into PWD’s rate structure and self-funded with rate revenues.

WRB is developing a way to use data sharing for periodic recertification of customer eligibility. Under TAP rules, recertification is required once every four years, but currently each household must submit its own documentation directly.

To maintain confidentiality of water customer information, WRB and IDEA have a written datasharing agreement based on IDEA’s standard data request process. For example, only information technology staff at WRB, not customer service staff, can see the data provided by IDEA. Additionally, the data IDEA provides to WRB do not identify the City of Philadelphia system from which the data originated. Both agencies also follow a security policy that applies to all of IDEA’s data sharing projects.

WRB staff stated that working on data sharing with another city agency that has shared goals, such as supporting low-income residents, can help motivate collaborative efforts to overcome practical challenges. City staff also recommended having a robust communications plan to explain how customer data are shared. Some customers are skeptical and may even wish to opt out of enrollment if they do not trust that their personal data are being handled appropriately.

NEW YORK CITY: MUNICIPAL WATER UTILITY SHARING DATA WITH OTHER CITY AGENCIES²⁹



KEY TAKEAWAYS:

- For those looking for a starting point, you don't need a fancy system to use data sharing. It's possible to do it manually.
- Involve your information technology team early to explore possibilities for automated data matching. Seek opportunities to improve automated matching capabilities when billing systems are upgraded.
- Be ready to adapt to how other agencies work (e.g., how they keep their data).

The New York City Home Water Assistance Program (HWAP) provides a \$145 annual credit on water and sewer bills for one- to four-family homeowners who participate in certain means-tested programs. The city's Department of Environmental Protection (DEP), which operates the municipal water and sewer system, administers this assistance program. Water and sewer charges in New York City are *in rem*, which means that the property owner is DEP's customer.

The program started in 2011 as a way to mitigate the impact of significant rate increases. DEP originally enrolled customers automatically, solely on the basis of data matching with the federal Low Income Home Energy Assistance Program (LIHEAP), which is administered locally by the city's Human Resources Administration (HRA). By relying on eligibility determinations already performed by its sister agency for the LIHEAP program, DEP avoided the need to collect and retain the same sensitive income information from households for its water assistance program.

In 2016 DEP expanded automatic enrollment to include the city's Department of Finance (DOF) list of recipients of local property tax exemptions for seniors, people with disabilities, and veterans. Adding the DOF data increased enrollment substantially. As of 2024, approximately 63,000 accounts were enrolled in HWAP. The majority were enrolled on the basis of their receipt of property tax exemptions, although some of those same customers also receive LIHEAP assistance.

Participation in HWAP is exclusively by automatic enrollment. There is no method for customers to apply directly on the basis of income eligibility, though considerations are made in cases of data entry errors or processing delays by partner agencies.

In the data sharing process, which occurs once annually, DEP receives only the lists of households participating in LIHEAP

or receiving the relevant property tax exemptions. Before HRA shares the LIHEAP data, it filters out participants who are renters because only homeowners are eligible for HWAP. All of DOF's property tax exemption recipients are, by definition, homeowners.

Originally DEP's data matching process was half manual and half automated. Now the process is almost entirely automated with limited manual checks. DEP was able to move to a more automated process when it upgraded its legacy billing system in 2021. In designing the new billing system, the agency factored its data-match needs into the system design.

The data fields matched include customer name and a property's block and lot numbers. DOF's property tax records and DEP's billing system both rely on the same property owner names and block and lot identifiers, which makes the matching process straightforward for the DOF data. HRA's data always include the property owner name and sometimes, but not always, block and lot information as well. Where HRA provides only an address, DEP will translate the address into block and lot format and identify the corresponding DEP account. The automated data matching can typically identify a match even when the property owner names are not a precise match (e.g., when there are variant spellings); where the automated process cannot make a determination, there is a manual review. Finally, before enrolling an account in HWAP, DEP removes properties that are not classified as one- to four-family residential because larger properties are not eligible for HWAP.

The DEP program manager offered the following advice for other water assistance programs seeking to use data sharing:

- Involve IT and other members of your technical team early on because how files are structured can determine how easy it is to automate data matching. You may need to start with a manual process.
- You need dedicated liaisons/partners with other agencies, and it's best if the partner agency has an aligned mission.
- Be ready to adapt to how other agencies work (e.g., how they keep their data).
- Include IT staff and a business analyst on your team. (Policy staff can also help identify overlap in eligibility between programs.)
- You don't need a fancy system to use data sharing. It's possible to do it manually, particularly with smaller utilities.

WESTMINSTER, COLORADO: MUNICIPAL WATER UTILITY SHARING DATA WITH A STATE-RUN ENERGY ASSISTANCE PROGRAM³⁰



KEY TAKEAWAYS:

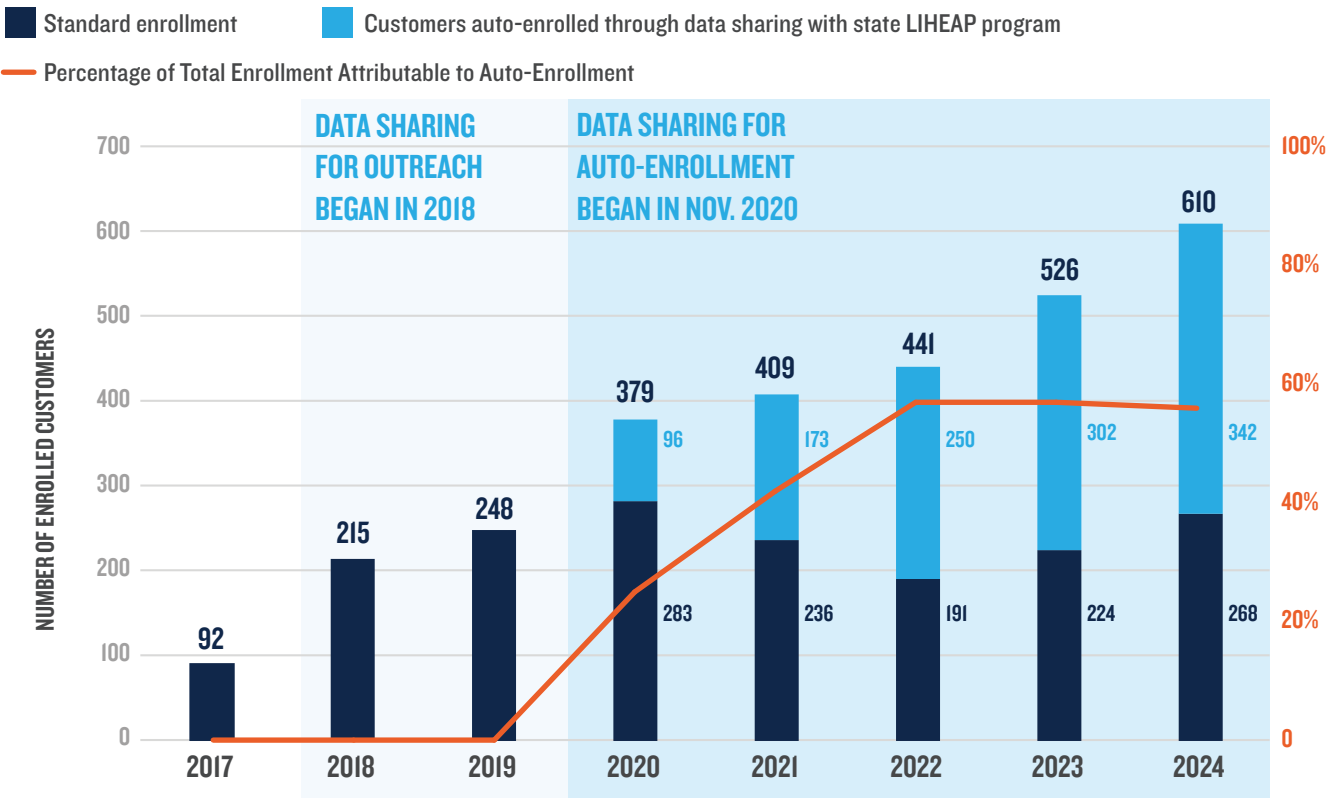
- Make sure you have the budget for increased enrollment in the bill discount program when you move to a data sharing/ auto-enrollment process.
- Build and maintain a good relationship with your partner agency that provides data.
- Low-tech methods like Excel spreadsheets can be used effectively for data matching.
- Automatic enrollment, without the need to submit an application, can generate more enrollment than simply using data matching for targeted outreach to eligible customers.

The City of Westminster, Colorado, has a Water Bill Assistance Program that provides a \$300 annual credit (\$25/month) on water and sewer bills for eligible customers. The program was originally motivated by the City Council’s concerns about impacts of a planned rate hike; an increase in the bill credit is anticipated with the next rate increase.

To qualify, a resident must be responsible for paying a water bill and be current on the bill (or enter a payment plan). Water customers who participate in LIHEAP are automatically deemed eligible for water assistance if they meet the other criteria. Over time, the program has evolved to automatically enroll customers who participate in LIHEAP, through datasharing with the state LIHEAP agency.

The city’s municipal water utility, run by the Public Works and Utilities Department, administers the program. In its current form, the program started in 2017 as an annual \$100 credit. In 2018 the water utility and the state LIHEAP office entered into a data sharing agreement in which the LIHEAP office provides the municipality a list of LIHEAP customers in the city. Originally the city used the list for targeted outreach about the Water Bill Assistance Program, informing LIHEAP participants that they were eligible for the water program and encouraging them to apply, without the need to submit further proof of income. The success rate with this approach was limited.

FIGURE 2: ENROLLED CUSTOMERS IN WESTMINSTER, CO





In 2020 the program manager learned of another municipality using data sharing to auto-enroll LIHEAP customers into its electric and water assistance programs. Inspired by that example, later that year Westminster began using the list of LIHEAP participants to automatically enroll eligible customers into the Water Bill Assistance Program, without the need for an application.

The switch to auto-enrollment sparked rapid growth in the program as it added new participants while retaining existing ones. In 2017 there were 92 participants; that grew to 248 in 2019. By the end of 2024, there were 610 accounts enrolled in the Water Bill Assistance Program, with 56 percent of them enrolled via auto-enrollment. The rest were enrolled after submitting an application to the city that included proof of income.

The data matching is performed through a manual process. To maintain confidentiality of personal information, only two people in the Water Bill Assistance Program office see the data. The customer's name and address for the program are kept on a spreadsheet. Once a month during the LIHEAP season (November 1—April 30), the Water Bill Assistance program coordinator gets a list of LIHEAP recipients, sorted by zip code for the eight zip codes that are wholly or partly within the service area of the water utility. The coordinator manually removes all addresses that are not within the

utility service area, as well as multifamily and manufactured housing park addresses, and then cross-checks the single-family addresses and names for accounts in the water billing system. If there is a match, the customer is enrolled automatically. The previous year's customer data is carried over if a customer appears on the current LIHEAP list.³¹

If the program is able to increase staff capacity, the program manager hopes to explore data matching with other programs beyond LIHEAP, such as the Supplemental Nutrition Assistance Program, Temporary Assistance to Needy Families, and a low-income senior tax credit program.

The program manager offers this advice for other water assistance programs seeking to use data sharing:

- Make sure you have the budget for increased enrollment in the bill assistance program when you move to a data sharing/auto-enrollment process, to avoid the need to cap enrollment.
- Make sure the billing department is ready and has a process in place to manage the data.
- Build and maintain a good relationship with your partner agency that provides data.
- Create a good system for tracking data, either working within the limits of existing software (such as Excel) or acquiring new software.

CALIFORNIA: CROSS-ENROLLMENT BETWEEN UTILITY-RUN WATER AND ENERGY ASSISTANCE PROGRAMS³²



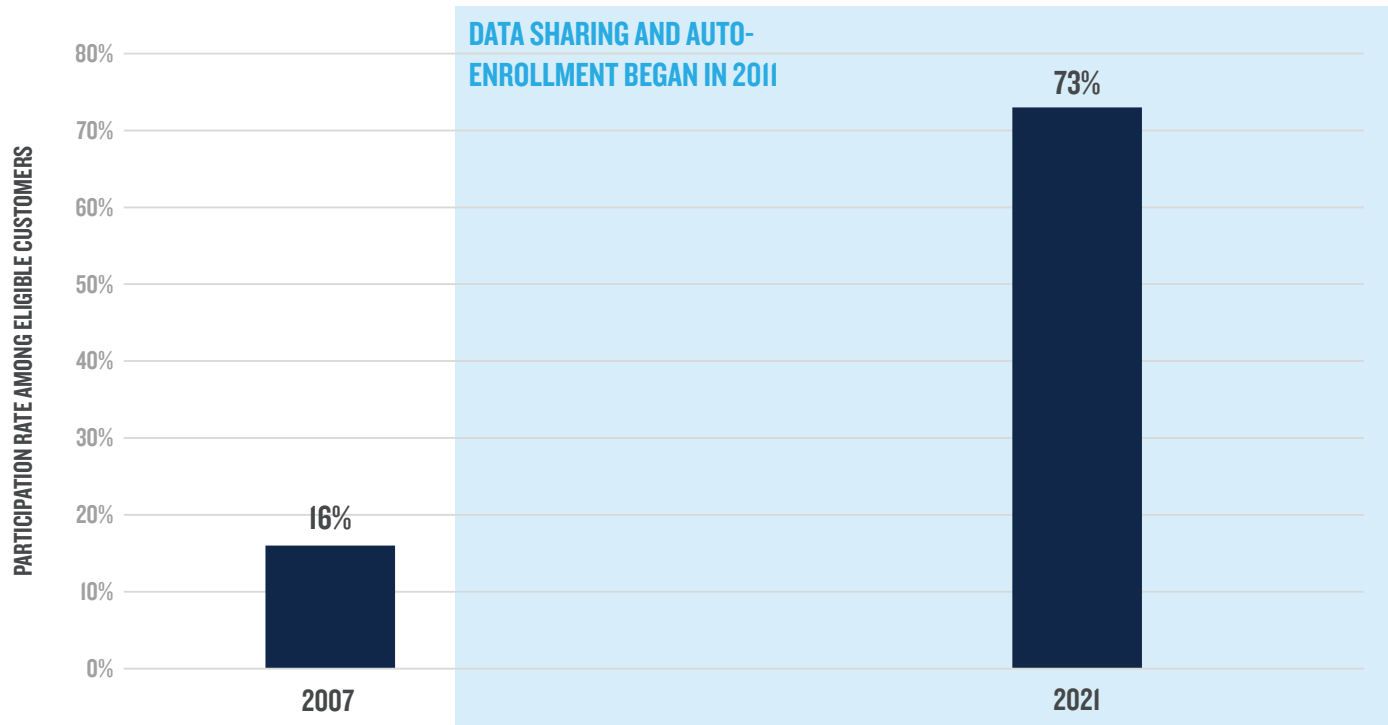
KEY TAKEAWAYS:

- State utility commissions can require effective data sharing among the water and energy utilities they regulate and can require those water utilities to automatically enroll eligible customers identified through data sharing.
- Water utilities can achieve a very high participation rate (more than 70 percent) in low-income discount programs through data sharing with energy utilities, especially where energy and water assistance programs use the same income eligibility limits.
- State utility commissions can create a forum to facilitate data sharing between publicly owned water systems they do not regulate and energy utilities they do regulate.
- State agencies can establish processes and guidelines to ensure customer information is protected when data are shared.

In California, the state’s large investor-owned water utilities all have low-income discounts, called customer assistance programs (CAPs), which are funded by rate revenues. As of 2007, these programs had a combined participation rate of only about 16 percent of eligible customers, while the state’s energy utilities had a combined participation rate above 93 percent in their low-income assistance program, called the California Alternate Rates for Energy (CARE) program.³³

In 2011, with support from the utilities and consumer advocates, the California Public Utilities Commission (CPUC) sought to increase participation in the water CAPs by requiring the large investor-owned energy utilities it regulates to share data on CARE participants with the large investor-owned water utilities it regulates. It also aligned the eligibility criteria for CARE and CAPs and required water utilities to automatically enroll CARE participants

FIGURE 3: PARTICIPATION RATE AMONG ELIGIBLE CUSTOMERS IN CALIFORNIA



*No enrollment data available for 2008 to 2020

into their CAPs without the need for a separate application. CPUC encouraged, but did not require, smaller, privately owned water utilities (as well as municipal energy utilities) to participate in the data exchanges.

When adopting these requirements, CPUC found that “sharing of low-income customer information is necessary to increase participation in low-income ratepayer assistance programs.”³⁴ Moreover, CPUC observed that “[d]ata sharing only identifies potential participants. . . . [A]utomatic enrollment decreases costs by eliminating duplicative efforts and streamlines customer enrollment through a hassle-free method. Thus, automatic enrollment will further increase penetration rates at a low cost.”³⁵ CPUC concluded that, for water utilities’ CAPs, automatic enrollment is “a necessary adjunct to a cost-effective data sharing program.”³⁶

A decade later, in 2021, CPUC adopted improvements to the energy–water data exchange processes. It also required the energy utilities to engage in data sharing with publicly owned water systems upon request, using a specific process that ensures confidentiality of customer data.³⁷

CPUC’s 2021 decision found that data sharing has “proven over the years to be the most effective enrollment method for water utility customers.” Six of the state’s nine large investor-owned water utilities reported that most of their CAP participants (between 50 percent and 92 percent) were enrolled through data sharing.³⁸ As of 2021, the nine large investor-owned water utilities, collectively, had an estimated 73 percent participation rate in their low-income discounts. All but one of the nine is estimated to have a participation rate exceeding 50 percent.³⁹ As of June 2024, there were nearly 294,000 customers enrolled in these water utilities’ CAPs.⁴⁰

The CPUC orders established the processes for secure data sharing. Among other things, utilities must execute and file with the CPUC a memorandum of understanding or nondisclosure agreement. The filing must include a description of measures to ensure that customer information remains secure, including secure file transfer methods and minimization of the number of utility employees with access to customer data. CPUC requires CARE energy assistance applications to include language securing the customer’s consent to share data to facilitate enrollment in water utility CAPs. It also requires an opportunity for customers not enrolled through a data match to apply for assistance via a more traditional method.⁴¹



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Data exchanges are done quarterly and include the customer’s name, address, phone number/email, and status participating in CARE. Energy and water utility staff maintain open lines of communication, meeting at least once annually.⁴²

The largest investor-owned water utilities each exchange data with three or four energy utilities, while others share data with only one or two. Among the energy utilities, most share data with six or seven water utilities. In most cases, the data sharing is two-way, with water utilities providing data on their CAP participants to the energy utilities, helping the energy utilities increase enrollment in CARE.⁴³

RESOURCES FROM THE CPUC DATA SHARING ORDERS:

- Guidelines for data sharing between large investor-owned water utilities and large investor-owned energy utilities: See Attachment 1 in CPUC Decision D.11-05-020, https://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/134999.PDF.
- Sample data sharing agreement between an investor-owned energy utility and a publicly owned water utility: “Southern California Edison Company’s Plan for Low-Income Program Data Sharing with Public Water Utilities,” Advice Letter 5277-E, filed with California Public Utilities Commission, April 16, 2024, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M529/K525/529525545.PDF>.
- Sample reporting requirements on data matching implementation: See Attachment 3 in CPUC Decision D.11-05-020, https://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/134999.PDF.

PENNSYLVANIA: ENROLLING LIHWAP RECIPIENTS IN UTILITY-RUN WATER ASSISTANCE PROGRAMS⁴⁴



KEY TAKEAWAYS:

- Where a state administers a statewide low-income water assistance program, it can share data to help water utilities increase enrollment in their own low-income discount programs.
- Low-tech methods, like Excel spreadsheets, can be used effectively for data sharing.
- Automatic enrollment, without the need to submit an application, can generate more enrollment than simply using data matching for targeted outreach to eligible customers.

In Pennsylvania, with assistance and input from low-income consumer advocates, the state Department of Human Services (DHS) negotiated agreements with some of the state's largest water utilities to share data on LIHWAP recipients in the utility's service areas, to facilitate enrollment in the utilities' own low-income assistance programs. DHS provided data in a digital format that could be opened as a spreadsheet using a secure file transfer program. Data included name, address, water account number, and household size and income. The utilities agreed to maintain the data securely and not share it for any other purpose.

Some water utilities used the DHS data to automatically enroll their customers who had already received LIHWAP. One example is the Philadelphia Water Department, which enrolled 3,218 customers through data matching with LIHWAP, as discussed in detail in the Philadelphia case study (page 12). Another example is Aqua Pennsylvania, an investor-owned utility, which followed a process very similar to Philadelphia's. DHS sent Aqua data on approximately 4,400 Aqua customers who had received a LIHWAP benefit.

The utility reviewed all of them for eligibility in Aqua's low-income Customer Assistance Program (CAP) and enrolled any eligible customer who was not already enrolled.⁴⁵ CAP is a tiered discount, with the size of a participant's discount depending on household income as a percentage of the federal poverty level (FPL). To place customers in the correct discount tier, the utility calculated income as a percentage of FPL using household size and income data from DHS. Through this data sharing arrangement, Aqua enrolled about 85 percent of the customers from the DHS list into CAP, without requiring an application from those customers.

The Pittsburgh Water and Sewer Authority also entered into a data sharing agreement with DHS. The state provided data on 1,708 customers believed to be in Pittsburgh Water's territory who had participated in LIHWAP. Of those, 626 remained after an initial review by the utility resulted in removing accounts because of duplication, because they were not a Pittsburgh Water customer, or for other, similar reasons. Another 85 were already enrolled in the utility's Bill Discount Program (BDP). Pittsburgh Water reached out to all others to encourage them to apply for the BDP but did not use the DHS data to enroll anyone without an application. From that outreach, only 92 customers successfully applied to BDP. The rest could not be reached, were no longer Pittsburgh Water customers, were not interested in applying, or had other reasons for not enrolling. Compared with Aqua's experience using data sharing for automatic enrollment, Pittsburgh Water's use of data sharing for targeted outreach achieved a much lower success rate.

VIRGINIA AND PUERTO RICO: DATA SHARING FOR RAPID ENROLLMENT IN LIHWAP⁴⁶



KEY TAKEAWAYS:

- By aligning income eligibility limits across programs and sharing data with utilities, state water assistance programs can rapidly distribute debt relief funding for low-income water customers.
- Low-income discount programs can work with specialized contractors to support data sharing.

Both Virginia and Puerto Rico used data sharing with water utilities to quickly distribute debt relief funding under the temporary LIHWAP program, often without the need for customers to apply.

In Virginia, the Department of Social Services (VDSS), which administers the federal LIHEAP program, administered LIHWAP. In Puerto Rico, the Departamento de la Familia, which administers the Supplemental Nutrition Assistance Program (SNAP), administered LIHWAP.

Consistent with federal guidance, both Virginia and Puerto Rico deemed households participating in several other income-qualified programs, including LIHEAP and SNAP, to be income-eligible for LIHWAP.⁴⁷ In both cases, water and/or

wastewater utilities submitted lists of customers with past-due water bills, and the agencies matched those customers against their lists of participants in LIHEAP (in Virginia) or SNAP (in Puerto Rico).

In Virginia, a specialized third-party contractor supported the data matching process and sent any customers who matched a text message with LIHWAP application information. If these households applied for LIHWAP, they were not required to submit income documentation. The data matches were performed weekly.

In Puerto Rico, customers who matched were automatically provided with a LIHWAP benefit, without the need for an application.

Data sharing enabled Virginia and Puerto Rico to quickly distribute LIHWAP assistance. In Virginia, within the first three months of operation, more than 13,000 households received in excess of \$9.5 million in water and wastewater debt relief. Puerto Rico delivered \$4.5 million in emergency water bill assistance to more than 11,000 households in five months.

NEW YORK STATE: LEGISLATION REQUIRING DATA SHARING BETWEEN STATE PROGRAMS AND UTILITY-RUN ASSISTANCE PROGRAMS⁴⁸



KEY TAKEAWAY:

- State legislation can drive data sharing between utilities and state social services programs.

In 2023 New York's two largest investor-owned water utilities, Veolia and Liberty Utilities, proposed new low-income customer assistance programs in their rate cases before the state Public Service Commission (PSC). The PSC gave a green light to both programs, creating the first low-income bill discounts ever offered by investor-owned water utilities in New York. During the rate cases, both utilities expressed interest in facilitating enrollment through data sharing with the state's Office of Temporary and Disability Assistance (OTDA), the agency that administers low-income programs such as LIHEAP, Temporary Assistance for Needy Families (TANF), and SNAP. However, the utilities identified challenges working out such an arrangement.

In response, in 2024 the state legislature enacted a law requiring OTDA and PSC-regulated water utilities to collaborate on an automated data-matching process to facilitate auto-enrollment of utility customers who participate in LIHEAP and TANF in the utilities' low-income assistance programs. It also allowed for OTDA to include data matching with additional programs that it administers.⁴⁹ This legislation amended a law passed the previous year that originally applied these requirements only to energy utility assistance programs, but not to water. As of this writing, OTDA and the utilities are developing plans to implement the data matching and auto-enrollment process.

JACKSON, MISSISSIPPI: UNSUCCESSFUL ATTEMPT AT DATA SHARING BETWEEN MUNICIPAL WATER SYSTEM AND A STATE AGENCY, WITH AN OPPORTUNITY TO TRY AGAIN



KEY TAKEAWAY:

- Data sharing between utilities and federally funded programs requires customer consent, but there are opportunities to collaborate to obtain that consent.

In Jackson, Mississippi, a federal court consent decree with the U.S. Environmental Protection Agency put the municipal water and sewer system under temporary management by a court-appointed interim third-party manager (ITPM). The ITPM has authority to set water and sewer rates to cover the costs of operation, maintenance, and capital improvements required by the consent decree. In November 2023 the utility increased rates for most customers. The new rate schedule created a customer class consisting of participants in the federal SNAP program, whose members receive discounted rates. The SNAP customer class includes about 25 percent of Jackson's residents.⁵⁰

The utility sought to automatically enroll these residents in the discounted rate. The ITPM asked the Mississippi Department of Health and Human Services (MDHS), which administers SNAP in the state, to share data on SNAP enrollees in the utility's service area. However, MDHS and the U.S. Department of Agriculture (USDA, which funds SNAP) refused to share the data. They maintained that, absent consent from SNAP participants, sharing SNAP enrollment data would violate federal privacy laws. A federal appeals court agreed, refusing the utility's request to require the state to share SNAP data.⁵¹

For now, Jackson customers who participate in SNAP can enroll in the discounted rate by submitting proof of SNAP participation. The ITPM reported that only one customer had contacted the utility to enroll as of mid-April 2025 but said that the utility will "find different ways for people to sign up" for the low-income water discount.⁵²

Jackson's water utility still has the opportunity to use data matching with SNAP if it reaches an agreement with MDHS on a method to do so consistent with federal privacy law. During the litigation, MDHS and the federal government offered that MDHS would share SNAP participation data if the water utility obtained customers' consent. They suggested several ways to obtain consent, such as "including in each water/sewer bill a means for account holders to provide their consent"; paying MDHS to mail SNAP recipients a consent form; or paying MDHS to mail out "vouchers or digital codes" that recipients can submit to the utility as proof of SNAP participation. MDHS said that the state would be able to "confirm [to the water utility] the SNAP status of all consenting individuals on a quarterly or annual basis."⁵³ As of this writing, the utility has not publicly stated whether it will pursue any of those options.



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NEW JERSEY: COORDINATION BETWEEN STATE AGENCIES FOR AUTOMATIC ENROLLMENT IN ENERGY ASSISTANCE PROGRAMS⁵⁴

KEY TAKEAWAYS:

- Utility assistance programs can work concurrently on data sharing with multiple partner programs to facilitate auto-enrollment. This can be especially efficient when the partner programs are all housed within a single agency.
- States considering data matching should, to the extent possible, modify applications for other income-qualified programs to request all of the information needed for auto-enrollment in utility assistance. To maximize enrollment, utility assistance programs should have plans to efficiently obtain any missing information, either from the utility or from the customer.
- It is important to have clear rules on the “hierarchy” of data sources, to establish which source is determinative when there is a conflict between datasets.

For low-income households, the New Jersey Department of Community Affairs (DCA) administers two major energy bill assistance programs that rely heavily on data sharing for automatic enrollment. These are LIHEAP, which is federally funded, and the Universal Service Fund (USF), which is specific to New Jersey and funded by a surcharge on all electric and gas utility bills. LIHEAP’s heating assistance program provides an annual bill credit in a standardized amount based on income and household size. USF is a percentage-of-income program in which participants receive monthly bill credits in the amount needed to ensure that their combined electric and gas costs do not exceed 4 percent of household income; they can also receive arrearage forgiveness. Further, enrollment in LIHEAP or USF exempts customers from shutoff during the winter months.

For more than a decade, DCA has automatically enrolled eligible households in LIHEAP heating assistance and USF using data shared by the state’s Department of Human Services (DHS).⁵⁵ The data come from households’ applications for a wide range of DHS-administered programs: SNAP, TANF, General Assistance (GA), and Pharmaceutical Assistance to the Aged and Disabled (PAAD) and Lifeline Utility Assistance, both of which support low-income people who are either disabled or age 65 or older. In some cases, electric and gas utilities provide DCA with additional data needed for auto-enrollment.

DCA and DHS use the same data management system, called the Family Assistance Management System, to manage the programs they run. This facilitates efficient sharing of information between the agencies. Additionally, DCA’s

systems are maintained by an information technology contractor, which provides support for the data matching process. Under a memorandum of agreement between the two agencies, DCA is not permitted to share personal identifying information received from DHS with any other agency.

DHS shares multiple data points, including, among other things, household income, household size, housing type (renter or owner), heating method (electric, gas, or delivered fuel), and, in some cases, the utility account number. Some of this information is in DHS’s systems specifically because the joint application for SNAP, TANF, and GA requests it for purposes of determining eligibility for energy assistance. That joint application includes explicit consent to use information to determine eligibility for energy assistance, although the application also includes a check box to opt out of consideration for energy assistance.⁵⁶

The minimum information that DCA needs to make a match for auto-enrollment in LIHEAP and USF includes head of household, household size, names and Social Security numbers of all members of the household, household income, and address.⁵⁷ With this information, DCA uses an automated process to identify households eligible for LIHEAP and/or USF and to determine the appropriate energy assistance benefit level. DCA receives a large tranche of data each fall, with rolling updates when DHS recertifies participants’ eligibility for its programs.⁵⁸

DCA may need additional information to complete auto-enrollment. Where the DHS data do not include a household’s utility account number, DCA contacts the household to obtain that information before disbursing funds. Additionally, for USF, DCA needs information on the household’s current energy bill to calculate the benefit level, which DCA obtains by reaching out directly to the state’s electric and gas utilities.⁵⁹ DCA also asks utilities to confirm that the name and address in the DHS data match the utility’s account information and to correct any discrepancies as needed. If any discrepancies remain, DCA will reach out to the household to get accurate information.⁶⁰

Through this comprehensive process, auto-enrollment accounts for about 65 percent of all enrollment in LIHEAP and USF.⁶¹

DCA staff noted that datasets are never perfect, which means certain work-arounds are required in the matching process. They stated that it is important to have clear rules

on which source of data is determinative when there is a conflict between two datasets. For example, the person listed as the DHS program participant sometimes is different from the household member whose name is listed on the utility account; in these cases, DCA uses addresses to identify matches where possible. Another data limitation is that because DHS provides benefits by electronic funds transfer, it sometimes does not have a complete physical address. In these and other cases of an imperfect match, DCA uses a data management technique known as “fuzzy matching” as a work-around to identify matches as closely as possible and, when feasible, reach out to customers to confirm the match.

DCA staff recommend that other states considering data matching should, to the extent possible, modify applications for other income-qualified programs to request all of the information needed for auto-enrollment in utility assistance. For example, in the future, DCA aims to improve the process so DHS programs will routinely collect applicants’ utility bill information and transmit it to DCA. DCA staff also noted the value of ongoing coordination between agencies to keep data up to date.



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MASSACHUSETTS: UTILITY-RUN ASSISTANCE PROGRAMS SHARING DATA WITH STATE PROGRAMS⁶²



KEY TAKEAWAY:

- States can take the lead on data sharing with utilities, using data from across multiple state programs.

In Massachusetts five electric and gas utilities use data matching to provide automatic discounts to customers who participate in several state-administered programs: MassHealth (which includes Medicaid and the Children’s Health Insurance Program [CHIP]), SNAP, TANF (known in the state as Transitional Aid to Families with Dependent Children), and Emergency Aid to the Elderly, Disabled, and Children (EAEDC).⁶³

About two decades ago, the utilities began data matching only with TANF and EAEDC, and later SNAP.⁶⁴ The utilities would send the state’s Department of Transitional Assistance (DTA) lists of their customers, and DTA would inform each utility which of its customers participated in at least one of those programs.⁶⁵ The utilities would then automatically enroll the SNAP and TANF participants in discounted rate programs, giving those customers notice and an opportunity to decline the discount.

In 2024 the state expanded this process to include participants in MassHealth.⁶⁶ The data matching is now managed by the state’s Executive Office of Health and Human Services (EOHHS), which oversees 11 state agencies, including DTA, and directly administers the MassHealth program. EOHHS relies on its master data management system (MDM) to conduct the data matching.⁶⁷ A data sharing agreement among the participating utilities, EOHHS, and DTA establishes procedures to maintain confidentiality of personally identifying information.

SAMPLE DATA SHARING AGREEMENTS FROM MASSACHUSETTS:

- Original 2003 data sharing agreement: <https://fileservice.eea.comacloud.net/FileService.Api/file/fileroom//9245573>.
- Expanded 2025 data sharing agreement: <https://www.nrdc.org/sites/default/files/2025-06/data-sharing-agreement-between-massachusetts-and-utility-companies.pdf>.

MARYLAND: LEGISLATION PROMPTING DATA SHARING FOR AUTOMATIC ENROLLMENT IN A STATE-RUN ENERGY ASSISTANCE PROGRAM



KEY TAKEAWAYS:

- State legislation can prompt state agencies to use data sharing to streamline enrollment in low-income utility discount programs.
- Legislation can mandate use of categorical eligibility and/or automatic enrollment.

In 2023 Maryland passed legislation that makes participants in several state-run human services programs categorically eligible, without further proof of income, for the state's two main low-income energy assistance programs: LIHEAP (also known as the Maryland Energy Assistance Program) and Electric Universal Service Program (EUSP) assistance. The law also requires automatic enrollment of those households in LIHEAP and EUSP, without the need for a separate application. Recipients of SNAP, TANF, Supplemental Security Income (SSI), or means-tested Veterans Affairs benefits are included.⁶⁸

The state's Office of Home Energy Programs (OHEP) facilitates the process through a preexisting integrated data management system that includes TANF, SNAP, and SSI participants' information. When that system has all household information needed for enrollment in the

energy assistance programs (including information on the household's utility provider), the household receives notification that it is being enrolled without the need for a separate application. If some of the necessary information is missing, the energy assistance program requests it from the household.⁶⁹

Maryland's categorical eligibility with automatic enrollment is still new, but monthly reporting shows that this data sharing process generated a marked increase in "applications" for energy assistance programs from July 2024 to January 2025 as compared with July 2023 to January 2024.⁷⁰ (OHEP's reports refer to customers being processed for automatic enrollment as "categorical eligibility applications," although, as noted above, the customer does not actually submit an application.) During the earlier period, before the new process took effect, there were 61,940 total applications to OHEP's energy assistance programs. The same period in the following year, after the new process took effect, saw 138,500 applications for categorical eligibility alone, out of 243,400 total OHEP applications (including traditional applications submitted directly by the utility customer).⁷¹

ENDNOTES

- 1 U.S. Environmental Protection Agency (hereinafter EPA), *Water Affordability Needs Assessment: Report to Congress*, EPA No. 8 30-R-24-015, December 2024, <https://www.epa.gov/system/files/documents/2024-12/water-affordability-needs-assessment.pdf>. These estimates are based on the combined bill for water and wastewater service. For purposes of the report, EPA calculated unaffordability using two alternative thresholds—a combined bill exceeding either 3 percent or 4.5 percent of household income.
- 2 A 2016 nationwide survey of 795 large and medium-size water and wastewater utilities found that only about 20 percent offered any kind of bill discount to low-income customers. EPA, *Drinking Water and Wastewater Utility Customer Assistance Programs*, April 2016, 7, https://www.epa.gov/sites/default/files/2016-04/documents/dw-ww_utilities_cap_combined_508.pdf.
- 3 Sridhar Vedachalam and Randall Dobkin, *H₂O Affordability: How Water Bill Assistance Programs Miss the Mark*, Environmental Policy Innovation Center, May 2021, 19, <https://static1.squarespace.com/static/611cc20b78b5f677dad664ab/t/614ceba138df2542c1af1d70/1632431025551/Cap+Report-Final-May.20.2021.pdf>.
- 4 See Vedachalam and Dobkin, *H₂O Affordability*.
- 5 To learn more about administrative burden in government programs, see Niskanen Center, “How Administrative Burdens Undermine Public Programs,” May 17, 2023, <https://www.niskanencenter.org/how-administrative-burdens-undermine-public-programs/>; Administrative Conference of the United States, “Identifying and Reducing Burdens on the Public in Administrative Processes,” December 31, 2023, <https://www.acus.gov/document/identifying-and-reducing-burdens-public-administrative-processes>.
- 6 Discount programs often are limited to direct customers of the utility, but in some cases they also provide financial support to tenants who pay for water indirectly through their rent.
- 7 Larry Levine, Olivia Wein, et al., *Water Affordability Advocacy Toolkit*, NRDC and National Consumer Law Center, June 2022, <https://www.nrdc.org/sites/default/files/water-affordability-toolkit-full-report.pdf>.
- 8 A United Kingdom-based organization recently published a similar report drawing on case studies from water utilities in the UK, which also holds lessons for the United States. Fabian Chessel and Deven Ghelani, *The Art of the Possible: How Data Can Improve Access to Social Tariffs in the Short and Medium Term*, Policy in Practice, March 2025, <https://policyinpractice.co.uk/publication/the-art-of-the-possible/>.
- 9 LIHWAP was a federally funded COVID-19 relief program, which expired in 2023 after helping more than 1.5 million households nationally. See Larry Levine, “Federal Water Assistance Helped Millions—Until the Money Dried Up,” NRDC, February 5, 2025, <https://www.nrdc.org/bio/larry-levine/federal-water-assistance-helped-millions-until-money-dried>.
- 10 Actionable Intelligence for Social Policy, “Integrated Data Systems Map,” accessed April 29, 2025, <https://aisp.upenn.edu/integrated-data-systems-map/>.
- 11 If a partner program uses a “benefits matrix” that groups participants into tiers by income range, that may be sufficient in some cases to identify which partner program participants are eligible for the water discount program, or to determine the appropriate water discount level, without the partner program needing to provide actual household income. Alternatively, households automatically enrolled through data matching could be placed in a default discount tier, based on the partner program’s maximum income threshold, with each automatically enrolled household given an opportunity to submit actual income documentation to qualify for a larger discount.
- 12 Other examples may be available from the authors of this report upon request.
- 13 Except where otherwise noted, all information in this case study comes from James Moore and Cassandra Henderson, City of Philadelphia Office of Integrated Data for Evidence and Action, and Susan Crosby and Kaileigh Murphy, City of Philadelphia Department of Revenue, personal communication via phone, August 27, 2024, with subsequent information provided by email.
- 14 TAP also forgives past arrears when participants pay their bills on time. For more detail on TAP, see Levine, Wein, et al., *Water Affordability Advocacy Toolkit*, 73–74. Although TAP’s name includes the words “assistance program,” it is more appropriately described as an “affordability program,” since it provides discounts designed specifically to achieve an affordable bill for each participating customer. For more on the distinction between affordability programs and assistance programs, see *ibid.*, at 76.
- 15 City of Philadelphia, “Philadelphia Launches New, Income-Based, Tiered Assistance Program,” press release, June 20, 2017, <https://www.phila.gov/press-releases/kenney/philadelphia-launches-new-income-based-tiered-assistance-program/>.
- 16 Philadelphia Department of Revenue, “Annual Report to the Mayor on the Tiered Assistance Program (TAP), Calendar Year 2022,” March 31, 2023, <https://www.phila.gov/media/20230526113411/Tiered-Assistance-Program-TAP-2022-annual-report.pdf>.
- 17 City of Philadelphia, “Philadelphia’s Integrated Data System 2022 Year in Review,” accessed June 9, 2025, <https://www.phila.gov/media/20230922103803/IDEA-Year-in-Review-2022.pdf>.
- 18 *Ibid.*; see also Data Smart City Solutions, “Using Data to Prevent Water Shutoffs in Philadelphia,” January 17, 2023, <https://datasmart.hks.harvard.edu/using-data-prevent-water-shutoffs-philadelphia>.
- 19 This total includes customers protected from shutoff because they participate in TAP.
- 20 Robert Ballenger, Community Legal Services of Philadelphia, personal communication, August 27, 2024.
- 21 The state provided LIHWAP participants’ name, address, household size, and household income, all of which was included in the LIHWAP application. WRB cross-referenced these data against its list of residential water customers, screening out a limited number of LIHWAP recipients who were not residential water account holders. For example, some lived in rental properties where the landlord was the water account holder; in that situation, the tenant is not eligible for TAP under the program’s rules.
- 22 Philadelphia Water Department, *Quarterly Report to the Rate Board as Required by the FY2024–2025 Rate Determination*, April 30, 2024, 8, <https://www.phila.gov/media/20240502091259/Quarterly-Report-to-Rate-Board-FY24Q3.pdf>. Some of the remaining customers on the LIHWAP recipient list were already enrolled in TAP.
- 23 Philadelphia Department of Revenue, “Annual Report to the Mayor on the Tiered Assistance Program (TAP), Calendar Year 2023,” November 8, 2024, <https://www.phila.gov/media/20241119141233/Tiered-Assistance-Program-TAP-2023-annual-report.l.pdf>.
- 24 When using data matching for TAP enrollment, WRB required a high confidence level, including an exact match of first name, last name, and address. In contrast, for the data matching program to flag accounts for shutoff protections, the city was more inclusive, allowing matches at a lower confidence level.
- 25 Reasons why a pre-qualified customer would not be enrolled include “because the account was already participating in TAP or had been discontinued since enrolling in the other program, for example. . . . The pre-qualification process [also] ensured that potential enrollees met residency guidelines. . . .” Philadelphia Water Department, *Quarterly Report to the Rate Board as Required by the FY2024–2025 Rate Determination*, January 24, 2024, 5, <https://www.phila.gov/media/20250127103447/Quarterly-Report-to-Rate-Board-2025-01-24.pdf>. In certain cases, if eligibility cannot be confirmed, the city conducts further outreach.

- 26 A copy of the letter that WRB sends to these customers to notify them of auto-enrollment is available here: <https://www.phila.gov/media/20240410170057/Exhibit-PA-TAP-2-2D.pdf>.
- 27 The city has not updated its estimate of total eligible customers since the program originally launched in 2017.
- 28 Philadelphia Water Department, *Quarterly Report to the Rate Board as Required by the FY2024–2025 Rate Determination*, January 24, 2025, 1, 7–8, <https://www.phila.gov/media/20250127103447/Quarterly-Report-to-Rate-Board-2025-01-24.pdf>. Also during 2024, data sharing with the state LIHWAP program, which concluded in February, added 511 more customers to TAP—accounting for most of the remaining increase in TAP enrollment that year. Philadelphia Water Department, *Quarterly Report to the Rate Board*, April 30, 2024, 8–9. In addition to pre-qualification for TAP, the city uses data from IDEA to target specific neighborhoods for TAP outreach, to encourage people who are not enrolled through the data matching process to submit applications. For example, the city is able to identify neighborhoods where a low percentage of customers in arrears are enrolled in TAP. See Philadelphia Department of Revenue, “Real Estate Tax Assistance Gap Map,” accessed May 20, 2025, <https://storymaps.arcgis.com/stories/43775b96f14848e5acc258b344921efa>.
- 29 Information in this case study comes from Albert Kramer, New York City Department of Environmental Protection, personal communication via phone, August 20, 2024, with supplemental information provided via email.
- 30 Information in this case study comes from Heather Sackett, City of Westminster Public Works and Utilities, personal communication via phone, December 5, 2024, with supplemental information via email.
- 31 Almost all LIHEAP recipients in Westminster who reside in single-family homes are now enrolled in the water assistance program. The main challenge concerns LIHEAP recipients whose names do not appear on the water account for their home address, typically because they are renters and the landlord is the water account holder. If the water utility can obtain proof that the tenant is responsible under the lease for paying the water bill, the tenant will be enrolled.
- 32 Except as otherwise noted, information in this case study comes from CPUC Decisions D.11-05-020 (issued May 10, 2011, in Docket No. R. 9-12-017), https://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/134999.PDF, and D.21-07-029 (issued July 20, 2021, in Docket No. R.17-06-024), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M394/K023/394023418.PDF>.
- 33 D.11-05-020, at 6, 8.
- 34 D.21-07-029, at 5.
- 35 D.11-05-020, at 15.
- 36 *Ibid.*, at 16.
- 37 D.21-07-029.
- 38 *Ibid.*, 22–25.
- 39 Kyra Gmoser-Daskalakis and Gregory Pierce, “Analysis of Class A Water Investor Owned Utility Customer Assistance Programs Enrollment (2010–2022),” April 2025, report commissioned by California Water Association, https://calwaterassn.com/wp-content/uploads/2025/05/IOU-CAP-Enrollment-Report_4_18_25-2.pdf.
- 40 CPUC Water Division, “Water Utilities Update,” presented to Low-Income Oversight Board, September 5, 2024, <https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2024/08/Item-11-C-CPUC-Standing-Reports-Water-Division.pdf>.
- 41 D.11-05-020, at 42–44 and Attachment 1.
- 42 D.21-07-029, at 26, 81–82. The energy and water utilities also recommended that CPUC develop a central repository for the data exchanges but, at this writing, the commission has not proceeded with this recommendation.
- 43 *Ibid.*, at 19–20.
- 44 Information in this case study comes from Elizabeth Marx, Pennsylvania Utility Law Project, personal communication via email, March 30, 2025 (includes information provided to Marx by Aqua and Pittsburgh Water); James Moore, City of Philadelphia Office of Integrated Data for Evidence and Action, and Susan Crosby, City of Philadelphia Department of Revenue, personal communication via phone, August 27, 2024, with subsequent information provided by email.
- 45 Some households on the list that were income-eligible were not eligible for other reasons, such as that they had moved and no longer received service from Aqua.
- 46 Except as otherwise noted, all information is from the U.S. Department of Health and Human Services, *Low Income Household Water Assistance Program—Implementation and Impact Final Report*, January 2025, 18, <https://acf.gov/sites/default/files/documents/ocs/LIHWAP-Final-Impact-and-Implementation-Report.pdf>; and Denise Suber, Virginia Department of Social Services, personal communication via phone, July 1, 2024.
- 47 U.S. Department of Health and Human Services, Administration for Children and Families, “The Low Income Household Water Assistance Data Dashboard—Implementation Plans,” accessed May 20, 2025, <https://lihwap-hhs-acf.opendata.arcgis.com/pages/implementation-plans>.
- 48 Except as otherwise noted, information in this case study comes from Laurie Wheelock, Public Utility Law Project of New York, personal communication via phone, March 19, 2025.
- 49 NY Social Services Law, section 131-ss, <https://www.nysenate.gov/legislation/laws/SOS/131-SS>.
- 50 Charlie Drape, “JXN Water Unveils New Billing Plan. Will Your Rates Rise?,” *Mississippi Clarion Ledger*, November 17, 2023, <https://www.clarionledger.com/story/news/local/2023/11/17/jxn-water-billing-rates-for-2024-see-new-system/71621253007/>.
- 51 Anthony Warren and Holly Emery, “‘Another Part of Our Uphill Battle’: Henifin Responds to Fifth Circuit Ruling Denying Request for SNAP Data,” *WLBT*, April 16, 2025, <https://www.wlbt.com/2025/04/16/another-part-our-uphill-battle-henifin-responds-fifth-circuit-ruling-denying-request-snap-data/>.
- 52 *Ibid.*
- 53 Letter from R. Anderson, MDHS, to Ted Henifin re: MDHS’s Position on Motion for Order to Release Supplemental Nutrition Assistance Program Recipient List, February 22, 2024, <https://www.scribd.com/document/716076076/MDHS-Letter>. This letter is also on file in the litigation. See *United States of America and State of Mississippi v. City of Jackson*, Mississippi, N.D. Miss., Docket No. 3:12-cv-00790-HTW-LGI (United States’ Memorandum in Opposition to Motion for Order to Release Supplemental Nutrition Assistance Program Recipients List, Exhibit A, filed March 19, 2024).
- 54 Except as otherwise noted, information in this case study comes from Fidel Ekhehar, New Jersey Department of Community Affairs, personal communication via phone, December 16, 2024, with supplemental information provided by email.
- 55 LIHEAP auto-enrollment is conditioned on the availability of federal funds. Additionally, LIHEAP cooling assistance is not included in the data matching because eligibility in New Jersey requires a specific medical need as documented by a medical professional.
- 56 New Jersey Department of Human Services, “Application and Affidavit for Public Assistance,” WFNJ-LJ (Rev. 09/20), accessed May 20, 2025, https://www.nj.gov/humanservices/njsnap/docs/wfnj-lj/20210920_WFNJ-LJEnglish.pdf.

- 57 DCA's system also screens for whether a household resides in public housing. Since public housing includes utilities within rent, these households are not automatically enrolled in energy assistance programs. We note that federal assistance programs, like LIHEAP, often have more eligibility criteria than ratepayer-funded utility assistance programs.
- 58 DCA performs the data matching, rather than DHS, because DHS programs do their client intake through county-run social service agencies and DHS does not have capacity to do centralized "data cleaning." DHS transmits the relevant data gathered by the county intake agencies directly to DCA.
- 59 As noted above, USF benefits are calculated to ensure that energy costs, after the USF credit, do not exceed a certain percentage of household income. This requires knowing both household income and the size of the household's current energy bills.
- 60 Additionally, utilities have access to a DCA portal to see if a customer's enrollment in LIHEAP or USF is held up by missing information. Utilities will sometimes assist with outreach to those customers.
- 61 Although LIHEAP enrollment is limited by the availability of federal funds, DCA has not encountered a situation in which federal funds were fully expended on automatically enrolled households. Beyond the auto-enrollment process, DCA accepts applications directly for LIHEAP and USF. Many eligible households that have not applied for DHS programs still enter LIHEAP and USF this way. Further, many households that do not qualify for DHS programs are still eligible for LIHEAP and/or USF, which have higher income eligibility thresholds than the DHS programs.
- 62 Except where otherwise noted, information in this case study was provided via email by Charlie Harak of the National Consumer Law Center, whose work includes a focus on the utility discount programs discussed in this case study.
- 63 Governor Maura Healey and Lieutenant Governor Kim Driscoll, "Healey-Driscoll Administration Announces Groundbreaking Partnership with Utility Companies to Lower Costs for Hundreds of Thousands of Households," press release, October 16, 2024, <https://www.mass.gov/news/healey-driscoll-administration-announces-groundbreaking-partnership-with-utility-companies-to-lower-costs-for-hundreds-of-thousands-of-households>. Additionally, each time an energy utility customer's LIHEAP application is approved, the utility is notified and automatically enrolls the customer in the utility's own low-income discount program.
- 64 See Commonwealth of Massachusetts, "Memorandum of Understanding Between the Department of Telecommunications and Energy, Executive Office of Health and Human Services, and Department of Transitional Assistance Regarding the Administration of Discounted Electric, Gas, and Telephone Services," August 8, 2003, <https://fileservice.eea.comacloud.net/FileService.Api/file/fileroom//9245573>; and Commonwealth of Massachusetts, Department of Public Utilities, *Order Expanding Low-Income Consumer Protections and Assistance*, DPU 08-4, September 15, 2008, 23 n. 12, <https://fileservice.eea.comacloud.net/FileService.Api/file/fileroom//9299136>.
- 65 The DTA programs have an income-eligibility cap equal to or less than the cap for the utilities' low-income discounts, which is 60 percent of state median income.
- 66 The state has also explained that the vast majority of participants in School Breakfast/National School Lunch programs and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) are effectively included, since there is very significant overlap in enrollment between those programs and SNAP, TANF, and MassHealth.
- 67 As explained in the datasharing agreement among EOHHS, DTA, and five of the state's investor-owned electric and gas utilities, MDM is "an information technology system that will allow for the unique identification of a client and development of a master 'record' of demographic and other common information across EOHHS constituent agencies' programs and systems. . . . The central component of this system is software capable of taking common identifiers (e.g., name, gender, address) and identifying multiple records in one or more systems that relate (or are highly likely to relate) to the same individual." "Data Matching Agreement Between the Executive Office of Health and Human Services, the Department of Transitional Assistance, and The Berkshire Gas Company, Eversource Energy, Liberty Utilities (New England Natural Gas Company) Corp, Boston Gas Company, d/b/a National Grid, Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, and Fitchburg Gas and Electric Light Company d/b/a Unitil," Sept. 5, 2025, <https://www.nrdc.org/sites/default/files/2025-06/data-sharing-agreement-between-massachusetts-and-utility-companies.pdf>.
- 68 2023 Md. Laws, ch. 207, https://mgaleg.maryland.gov/2023RS/chapters_noln/Ch_207_hb0323T.pdf. The legislation is codified at Maryland Code, Human Services, Section 5-5A-07.
- 69 Maryland Department of Human Services, *Detailed Model Plan (LIHEAP) Revision #2*, report period October 1, 2024, to September 30, 2025, 5, https://liheapch.acf.hhs.gov/docs/2025/state-plans/MD_Plan_2025.pdf.
- 70 OHEP reports monthly data on its energy assistance programs at <https://dhs.maryland.gov/office-of-home-energy-programs/ohep-monthly-data/>.
- 71 Compare OHEP applications in the December 2024 and January 2025 report (<https://dhs.maryland.gov/documents/OHEP/OHEP%20Monthly%20Data/2024-12%20December%20and%202025-01%20January/Monthly-Public-Reports-FY-25-OHEP-Application-Intake-3.pdf>) with the OHEP applications in the January 2024 report (<https://dhs.maryland.gov/documents/OHEP/OHEP%20Monthly%20Data/2024-01%20January/Monthly-Public-Reporting-Application-Intake.pdf>). In the reports, the category labeled "Categorical Eligible (CE) Applications—RFAI sent" refers to instances where OHEP has sent the customer a "request for additional information" because data sharing did not include all of the information necessary for automatic enrollment (such as utility information). These are included in the tally of categorical eligibility applications.