

Customer Assistance Program Plan



GUIDELINES & IMPLEMENTATION
VERSION 1.1 – JANUARY 24, 2019

MSD Customer Assistance Program Plan

Guidelines & Implementation

Overview

Under the express permission of Ohio Revised Code Section 6117.02 (F), an Ohio Board of County Commissioners (the “Board”) has the authority to enact a discount sewer rate for persons who are sixty-five years of age or older and meet other eligibility requirements, as established by the Board.

I. Purpose

The Metropolitan Sewer District of Greater Cincinnati (MSD) Customer Assistance Program (CAP) Plan is intended to provide (1) eligibility requirements for determining if a MSD ratepayer qualifies for a discounted sewer rate, and (2) the general parameters of MSD’s CAP implementation plan. Eligibility requirements for the CAP are consistent with the requirements of 6117.02(F) and adapted from Ohio Department of Taxation Homestead Exemption and the Hamilton County Auditor’s Homestead Exemption to meet the provisions of the Revised Code.

II. Eligibility Requirements

The eligibility requirements for the MSD senior sewer rate are as follows:

- A. The applicant must currently be billed for MSD sewerage services
 - i. If MSD sewerage services is billed to the applicant’s spouse, the spouse must meet the criteria set forth below
- B. The applicant must be sixty-five years of age or older;
- C. The applicant must meet the following eligibility requirements of the homestead exemption as set forth in R.C. 323.152:
 - i. **Ownership** - the applicant must own and occupy as their principal place of residence the property for which discounted sewer rates are requested
 - a. Property that is owned by a corporation, partnership, limited liability company or other legal entity does not qualify.
 - ii. **Income** - the applicant’s total income must be no more than **\$32,800 for 2019**, or the amount as indexed annually by the Ohio Department of Taxation, pursuant to R.C. 323.152(A)(1)(b)(iii);
 - a. “Total income” is the Ohio Adjusted Gross Income (OAGI) of the applicant and applicant’s spouse
- D. The applicant must apply annually for the CAP;
 - i. If the applicant becomes ineligible, they have the responsibility to notify MSD that their eligibility status has changed. Eligibility status change may be one reason for termination from the CAP.
 - ii. Discovery of a fraudulent application could result in termination of service, recovery of past discounts and/or civil and/or criminal enforcement.

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III. Implementation Plan

MSD will use the following process steps to effectively implement the CAP. As the CAP progresses through its first year, MSD may propose refined CAP implementation processes to the Board. The process outlined herein is intended to provide high-level overview.

- A. Set up – MSD’s CAP Manager will oversee the application process review and manage an internal CAP Review Panel. The CAP Program will be managed within MSD’s Office of Director. MSD will establish a direct CAP phone line, web page, outreach information and outreach plan for informing and communicating with CAP applicants and participants. MSD will coordinate the implementation of the CAP with all billing providers so the discounted sewer rate can be applied to eligible MSD ratepayers’ sewerage service charges by May 1, 2019.
- B. Initial Communication and Outreach – MSD will develop an outreach plan that includes (1) a database of potentially eligible customers; (2) outreach methods that would include written and electronic forms of communications, including but not limited to letters, brochure, newsletters, emails, media/social media, website, public meetings and/or presentations; and (3) coordination with Hamilton County area senior service and other social services agencies.
- C. Eligibility Review – MSD will review and validate CAP applications based upon the eligibility requirements contained in Section II of these Guidelines and Implementation Plan. MSD anticipates that this review will take a minimum of 21 days and is dependent upon the completeness of the applicant’s submittal. MSD’s CAP Manager may convene an internal CAP Review Team to evaluate the applicant’s documentation. During this application review period, MSD will provide Greater Cincinnati Water Works with applicant information in order to protect the applicant from water and sewer service shut-off. MSD will request Hamilton County political jurisdictions that provide water service and sewer billing for MSD customers to abide by a similar shut-off hold during the eligibility review period.
- D. Eligibility Documentation –this information provided to the MSD CAP will include (copies only, not originals):
 - a. Birth certificate, state-issued ID, or current driver’s license
 - b. If applicant and/or spouse filed an Ohio income tax return last year, provide the IT1040 form (pgs. 1 & 2) filed
 - c. If applicant and/or spouse was not required to file an Ohio income tax return, provide any W-2 and/or 1099s for prior tax year

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- E. Eligibility Approval – Once an applicant is approved, MSD will communicate approval to apply the discount to the applicant’s sewerage service charges to the applicable billing provider.
- F. Eligibility Denial – Any denial of a CAP applicant will be based upon a failure to demonstrate eligibility as outlined in Section II of these Guidelines & Plan.
- G. Continuing Communication and Outreach – MSD will provide ongoing communications and outreach to target audiences to ensure the public is aware of the CAP and how to participate.
- H. Termination – MSD may terminate CAP participation due to (1) submitting a fraudulent application, (2) change in eligibility status, or (3) a change in an active billing account information relative to CAP eligibility.
- I. Appeals – MSD CAP applicants and approved CAP customers are able to appeal the determination and findings of the MSD CAP Manager through the City of Cincinnati Office of Administrative Hearings. MSD’s CAP Manager will provide information on the appeal process to the applicant upon request.