



**ERIE COUNTY WATER AUTHORITY**  
**INTEROFFICE MEMORANDUM**  
February 25, 2022

To: Commissioners Schad, LaGree and Iannello

From: Sabrina A. Figler, Director of Water Quality  
Leonard F. Kowalski, Executive Engineer  
Joyce A. Tomaka, Comptroller

Subject: Approval of Credit Incentive Recruitment Program to Increase Participation in the Lead & Copper Sampling Program

The regulations relative to Lead & Copper that ECWA is currently following have been around for decades. The Revised Lead & Copper Rule was formally put into effect in December 2021 with the first actionable item occurring in October 2024 (service line inventory) and the new sampling requirements are starting in 2025. ECWA is currently following the existing rule and is required to perform sampling every three years; 2022 is a sampling year.

Under the current regulation, Water Quality needs a minimum 50 testing sites for the upcoming sampling plan that will take place during the summer of 2022. We are currently at the minimum sites required and are one participant away from not being in compliance with the regulations. Past participants may not want to participate for a variety of reasons (vacation, moved, etc..) or they might have had their service replaced. If ECWA is above current action levels established by the regulation, the number of sampling sites increases to 100 and the EPA strongly recommends having access to at least 150 testing sites in the event a participant drops out.

Approximately two months ago, several ECWA personnel were watching a New York State AWWA lunch-n-learn series, and the City of Rochester (COR) gave an overview of their past and current recruitment efforts. Their past efforts were very similar to ours—send out lots of information on lead, follow-up phone calls, etc. The result was minimal participation. Then they revamped their strategy by streamlining what they mailed to residents. The technical jargon was stripped from most of the information contained in the mailings and they made it easier for residents to communicate by providing options such as text messages, e-mail or standard voice calls—they determined many people hate talking on the phone. In addition, the mailing included a QR Code that once it is scanned from a smartphone or electronic device, it takes the potential participant directly to an on-line form. The on-line form requests customer information, preferred method of contact and allows uploading of pictures. The COR's new strategy resulted in a 35% participation rate, and they easily exceeded the number of participants they needed. ECWA's IT Department has already developed an on-line form to be used in our outreach program.

On top of simplifying what was being communicated to residents and utilizing modern communication methods, the COR also offered a \$25 credit to residents who participated in the sampling program. We recommend that ECWA do the same. The credit will only be granted to those who participate in and complete the program. The service line must be inspected by ECWA personnel, a lead line must be confirmed and sampling has to take place. The credit will be issued at the completion of the program which is expected to be in the last quarter of 2022.

Contacting potential participants must begin in mid to late March in order to have those individuals ready to begin the sampling program. The sampling can begin on June 1<sup>st</sup> and all results need to be completed by September 30<sup>th</sup>.

A considerable amount of time and effort from ECWA personnel has been put into the recruitment effort during the last several iterations of the sampling program. We believe the \$25 credit is a vital component to the success of this program. If we are lucky enough to obtain 150 qualified participants, the credit incentive total would amount to \$3,750.

To put this into perspective or consider the return on investment, it would take a crew several hours to excavate a service line, which would cost approximately \$1,500 to \$2,500 and there is no guarantee that a lead service will be found. This process would have to be repeated several hundred times in order to locate 150 lead services. The excavation method would cost significantly more than offering participants a \$25 credit. Please consider approval of the credit incentive.