

TECHNICAL MEMORANDUM 2-6

Audit the Payment and Collections Process

This memo constitutes the deliverable for Phase 2 Task 6 of the contract between The Abrahams Group (TAG) and the City of Brockton. The information documented in this memo was compiled over the course of multiple interviews with Department of Public Works (DPW) and the City's financial staff and reviews of both paper and digital documentation kept in both the DPW's files, as well as the City's MUNIS Utility Billing database.

This technical memorandum is based on interviews of the City Collector and his staff as well as the Billing Office staff. Interviews of Billing Office Staff, including the DPW Commissioner and his Administrative Assistant, the Treasurer/Collector and his staff, were conducted in the Billing Office at City Hall. Treasurer/Collector's personnel were interviewed in the Tax Collector's Office.

PLAN OF SERVICE

The goal of this task is to gain confidence in the collection and posting process. This task falls solely in the Collector's office, as bill inquiries, abatement requests, and other non-payment activities are addressed in Task 7. This task consists of six sub tasks which are described below.

- A. Interview the staff from the billing office to discuss systems, protocols, and methods to handle inquiries (phone, email and in person) regarding bills. Determine whether current training procedures are adequate to ensure staff has the skills needed to fully employ the MUNIS billing module.
- B. Review routine posting of payments into MUNIS utility billing module by the Collections Department, including:
 - B.1 Protocol for bill disputes or partial payments that arrive at the Collector's office.
 - B.2 Continue the tracing of selected accounts (Task 5.B) through the posting in the Collector's office.
- C. Assess the Collector's notifications and collections protocol for past due balances.
- D. Review the policies, procedures, and practices of the City Collections Department for transfer/sales of property and for liening past due accounts including:
 - D.1 Issuing MLCs at time of transfer of property.
 - D.2 Handling past due balances for tax exempt parcels.
- E. Review the lien posting process and MUNIS utility billing past due balance clearing once liens have been posted.
 - E.1 Continue the tracing of selected accounts (Task 6. D.2) through the liens posting in the Collector's office.

FINDINGS

The Tax Collector, per Division 3, Section 2-282(9) of the Brockton City Ordinances is also the City Collector, for other amounts owed the City. Under Division 3, Section 282(10) he "shall collect all water rates". In addition to this, the City, on August 29, 1923, accepted Massachusetts General Laws Chapter 40, Sections 42A – F which relate to "Collection of Water Rates". The City also accepted the provisions of Massachusetts General Laws Chapter 83, Sections 16A – F, relating to charges for use of sewers on May 14, 1980.

This technical memorandum describes procedures in place in the Collector's Office as well as some of the Billing Office, which are also discussed in part in Tasks 2-4 and 2-5.

6a. Interview The Staff from the Billing Office to Discuss Systems, Protocols, and Methods to Handle Inquiries (Phone, Email and in Person) Regarding Bills. Determine Whether Current Training Procedures are Adequate to Ensure Staff Has the Skills Needed to Fully Employ the MUNIS Billing Module.

Current training procedures are inadequate to ensure staff has the skills needed to fully employ the MUNIS billing module. MUNIS training has been discussed in Technical Memorandum 2-4. Refer to section F of that memorandum where we stated that there is a glaring absence of formal MUNIS training for the Billing Office clerks.

The six clerks and head clerk were all interviewed separately relative to their duties, whether or not they feel they are adequately trained, what could be done to make their job easier, and provide better service to the citizens of Brockton. One clerk had been hired as recently as December 2010 and was in the process of learning her job. Training of this individual was provided by other office personnel and the Head Billing Clerk. This clerk did not feel she was in a position to offer a critique of office operations except to say it was a very busy place and she wanted to learn more so she could do more. Others described how people would call on the phone to inquire about bills they had received.

One major problem recently encountered was that of people receiving an actual bill after receiving estimated bills over the last several billing periods and in some cases over the last several years. In many cases the actual bill was for a large sum of money. The office staff handled these inquiries, explaining that the billings were based on current water/sewer rates and an adjustment could be made to the bill once all information was gathered. In some cases the Supervising Clerk or the Head Clerk needed to talk to the customer to defuse the customer's anger or to further explain the situation.

Information was compiled by the clerks and the account researched. Once completed, the customer was contacted and offered what they call a "block adjustment" whereby current usage is measured over two quarters, to determine what the current usage is and an assumption was made that this quarterly usage was consistent over the period between the actual readings of the meter. If the actual usage between actual reads could be determined, it was assumed that usage was the average quarterly usage throughout the period. Once this was done, the rates in effect over this period were applied to the presumed actual usage. The difference between the charges based on this computation and the bill received by the user was adjusted down. These adjustments could amount to a considerable sum of money. If the user was still unhappy with the adjusted bill, they could request a meeting with the DPW Commissioner to plead their case. This topic is further discussed in Technical Memorandum 2-9.

MUNIS training was discussed with all clerks. The lack of training by MUNIS personnel was the one consistent theme among the clerks. While all felt they were adequately trained in their duties by other office personnel, they did express a desire to know what else, if anything, the software could do to make their job easier, enhance controls, and make them more efficient. Most had received no training from MUNIS personnel. MUNIS training was originally provided in 1999 when MUNIS was installed. However, many clerks felt they were "short-changed" on training because of time limitations in the original contract with MUNIS. Supervisory personnel expressed a desire to know more about what the system was capable of doing for them as well.

6B Review Routine Posting of Payments into MUNIS Utility Billing Module by the Collections Department, Including:

Payments received in the Collector's Office are entered daily as they are received at the counter or when the mail for the day arrives and is opened.

B.1 Protocol for Bill Disputes or Partial Payments that Arrive at the Collector's Office

Partial payments of water/sewer bills are accepted in the Collector's Office as frequently as the rate payer wants to make one. If a rate payer wishes to dispute a bill in whole or in part, the Collector's Office explains to the person that they can only handle payments and questions about the amount of the bill have to be handled in the Billing Office and they are directed to the 3rd floor billing office.

There are two separate protocols for disputing a Utility Bill. One for bills prior to being liened to the tax bills and the other for after liening has taken place (generally in December each year).

Unpaid water liens can be subject to a tax lien 14 days after a demand notice of delinquency has been issued in accordance with M.G.L. Ch. 60, §53. The lien is committed to the Collector by the Board of Assessors and collected by the collector as a part of the tax collections. For delinquent water (MGL Ch. 40, sections 42A-f), sewer (MGL Ch. 38, sections 16A-F), and trash (MGL Ch. 44, section 28C(f)) charges, a community may lien these amounts on the property tax provided the enabling legislation is accepted and a certificate of acceptance is on file at the Registry of Deeds. For other unpaid local charges and fees, a community may adopt MGL Ch. 40 section 58 separately for each purpose in order to lien each upon the property tax.

Prior to a bill being liened, a property owner who believes his bill is incorrect would come to the Billing Office on the 3rd floor of City Hall and given the opportunity to discuss their bill. The Billing Office clerk would first explain the bill and go over the reasons a reading could be high like dripping faucets, flush leaks, or a bad meter. They then offer to have the person's meter re-read.

If this does not provide sufficient information to please the customer, DPW may explain to the customer how to perform a die test, and may suggest that the customer use food coloring, which, after being placed in the toilet tank, will cause the water to be colored when it appears in the toilet bowl, proving the tank is leaking and needs repair. If this does not show signs of any leak, the clerk will offer to have the meter tested in the homeowner's presence for a fee of \$75.00.

They may have additional people present to observe the test too. If the meter tests inaccurate, the billing office will refund the \$75.00 fee and replace the meter. The new meter will be monitored for usage for 90 days and that usage may be averaged to determine past average usage as per the Procedure codified in

July 2010. If the meter tests accurate, the current bill stands as issued. This is discussed in under Task 2-7 in more detail.

If the meter works fine, a bill for the quarter just ended will be given to the homeowner and a back bill will be calculated for all quarters since the last actual reading was taken and given to the homeowner who will be expected to pay. If a homeowner has a large bill that is in danger of being liened and he wants a payment plan for the back charges due, he can request one of the tax collector and DPW. This is discussed under Task 2-7 in more detail.

If a bill has been liened, a request for abatement must be filed with the DPW, water billing office and if it is found that there is a billing error, the DPW Commissioner will notify the Board of Assessors via written communication, with a copy to the City Tax Collector of the amount of any abatement granted. Only the Board of Assessors is authorized, by law, to do abatements to tax bills.

The deadline to file appeals of utility bills is February 1. This allows customers whose bills have been liened to file appeals with the State Appellate Tax Board. The City committed about \$9 million for unpaid water and sewer charges which were added to the tax bills for FY 2011. The City provided an explanation of the process on January 7, 2011. This correspondence appears as Appendix 2-6.1.

Of the customers who filed an appeal on their utility bill(s), one was filed late making it ineligible, and two did not involve water bills. The remaining were to be considered by the DPW Director within 90 days. The reasons given for appeals were for such reasons as having a leaking plumbing fixture to the bill being "too high" and "no water used". In the case of no water being used (due to a property being vacant) in order to not be billed for the minimum usage, the meter would have to have been disconnected and removed by the Water Dept. If it had not been, the minimum charge would still apply. In the cases involving leaks on the customer side of the meter, consideration would be given to abating part of the sewer bill due to leaking water not going into the sewer system. Some of these customers had been given block adjustments, but they were still not satisfied. A listing of the customers who have filed appeals appears as Appendix 2-6.2.

B-2 Continue the Tracing of Selected Accounts from Task 5B through Posting in the Collector's Office

The tracing of selected accounts is discussed in Task 2-5. Refer to Technical Memorandum 2-5 and Appendix 2-5.3.

6C Assess the Collector's Notifications and Collections Protocol for Past Due Balances

Past due balances appear on the regular quarterly bills. There are no other follow-up bills sent. Payments received in the Collector's Office are applied to the oldest balance on the account unless the person paying specifies differently. Prior balances are all included in one amount on the bills. Utility liens are also listed separately and do include interest up to the date the lien is added to the tax bill. Utility liens are added to the actual tax bill (called Utility Liens Added to Tax) for each fiscal year, which is due February 1 each year. Utility liens added to tax are for all amounts outstanding for prior fiscal years but do not include the first two quarters of the then current fiscal year. Interest is computed on balances being paid at the time they are paid except that liened amounts include interest to the date of the lien. Subsequent interest is added at the time the lien is paid.

Annually, the City has processed between 4,100 to 6,200 accounts from current user charge receivables to Utility Liens Added to Tax over the past six years. This represents about 29% of the number of the

approximate 22,300 water and sewer accounts (2010). The table below presents the approximate number of accounts of Utility Liens Added to Taxes over the past six years.

Description	2006	2007	2008	2009	2010	2011	Total
# of Accounts Liened	4,172	4,737	5,352	5,346	5,954	6,270	31,831
Increase/(Decrease)		565	615	-6	608	316	2,098
Percent Inc/(Decrease)		14%	13%	0%	11%	5%	50%

The table below presents the approximate amount of dollars of Utility Liens Added to Taxes over the past six years.

DESCRIPTION	FY06	FY07	FY08	FY09	FY10	FY11
WATER						
WATER LIEN TO TAX BILL	\$ 1,051,410	\$ 1,143,398	\$ 1,822,104	\$ 1,444,130	\$ 2,564,691	\$ 2,765,656
COMM INT FOR WATER LIEN ON TAX BILL	\$ 124,183	\$ 133,181	\$ 214,373	\$ 182,209	\$ 319,925	\$ 369,742
TOTAL WATER	\$ 1,175,593	\$ 1,276,579	\$ 2,036,477	\$ 1,626,339	\$ 2,884,615	\$ 3,135,398
SEWER						
SEWER LIEN INTEREST TO TAX BILL	\$ 118,796	\$ 132,816	\$ 264,086	\$ 241,865	\$ 323,791	\$ 423,893
SEWER LIEN TO TAXES	\$ 1,045,096	\$ 1,158,536	\$ 2,425,600	\$ 1,971,065	\$ 2,731,370	\$ 3,311,328
TOTAL SEWER	\$ 1,163,891	\$ 1,291,352	\$ 2,689,686	\$ 2,212,929	\$ 3,055,161	\$ 3,735,221
TOTAL	\$ 2,339,484	\$ 2,567,931	\$ 4,726,163	\$ 3,839,269	\$ 5,939,777	\$ 6,870,619

The number of accounts and the dollars are growing each year. While the number of liens have increase by 50% in six years from 4,172 to 6,270, the dollars have increased by almost 200% from \$2,339,484 to \$5,939,777. Note that the City committed nearly \$800,000 in interest on water and sewer liens in FY 2011 and over \$2.8 million over the past six years.

These accounts are generally repeaters; they appear more than once in the past six years as a utility lien added to tax. The table below illustrates the number of accounts that have more than one utility lien added to taxes in the past six years.

Description	#
6 Connective Years	1,368
5 of the Six Years	1,316
4 of the Six Years	1,433
3 of the Six Years	1,544
2 of the Six Years	1,810

The City Finance Team believes that a number of property owners wait until their utility accounts are liened to their real estate taxes so they can pay them with their tax bill and then deduct the amounts on their Federal Tax Returns, which the Internal Revenue Service does not allow.

Although the number of liens might seem high, the Finance Director reports that the number of liens paid within the first 6 months after liening remains constant each year so there is no negative impact on annual revenues. Refer to Technical Memorandum 2-4 for a similar discussion.

The following table describes the amount of utility liens collected on tax bills from FY 2006 through FY 2011. Note that the collections refer not to the year it was collected, but the year of the charges. So the FY 2007 collections relate to the payments taken on the FY 2006 bills.

DESCRIPTION	FY06	FY07	FY08	FY09	FY10	FY11
WATER						
WATER LIEN TO TAX BILL	\$ 864,103	\$ 928,626	\$ 1,248,769	\$ 1,285,940	\$ 2,133,324	\$ 2,153,321
COMM INT FOR WATER LIEN ON TAX BILL	\$ 96,286	\$ 105,734	\$ 156,934	\$ 161,398	\$ 261,813	\$ 261,657
TOTAL WATER	\$ 960,389	\$ 1,034,359	\$ 1,405,703	\$ 1,447,338	\$ 2,395,137	\$ 2,414,978
SEWER						
SEWER LIEN INTEREST TO TAX BILL	\$ 91,642	\$ 104,654	\$ 166,028	\$ 213,500	\$ 258,291	\$ 304,150
SEWER LIEN TO TAXES	\$ 861,072	\$ 935,759	\$ 1,422,842	\$ 1,755,290	\$ 2,249,978	\$ 2,423,145
TOTAL SEWER	\$ 952,714	\$ 1,040,413	\$ 1,588,871	\$ 1,968,790	\$ 2,508,269	\$ 2,727,295
TOTAL	\$ 1,913,103	\$ 2,074,773	\$ 2,994,574	\$ 3,416,128	\$ 4,903,405	\$ 5,142,273

Note that the City collected about \$565,000 in FY 2011 and over \$2.1 million in committed interest on water and sewer liens over the past six years.

Most of the accounts that become a utility lien added to tax do not become part of a tax lien. As shown in the following table, about 5% (2009, 2010) of the utility liens added to taxes become a tax lien. Between 2006 and 2010, 1,826 accounts became part of tax liens. This number peaked in 2008 and has declined since 2008.

Description	2006	2007	2008	2009	2010	Total
# of Lien Accounts to Tax Title	326	446	472	295	287	1,826
Increase/(Decrease)		120	26	-177	-8	-39
Percent Inc/(Decrease)		37%	6%	-38%	-3%	-12%

The table below presents the approximate amount of dollars of water and sewer accounts in tax title over the past six years.

DESCRIPTION	FY06	FY07	FY08	FY09	FY10
WATER					
WATER LIEN TO TAX BILL -TT	\$ 131,107	\$ 135,842	\$ 174,346	\$ 135,696	\$ 193,118
COMM INT FOR WATER LIEN ON TAX BILL -TT	\$ 15,876	\$ 16,754	\$ 22,355	\$ 17,851	\$ 25,199
TOTAL WATER	\$ 146,982	\$ 152,595	\$ 196,700	\$ 153,547	\$ 218,317
SEWER					
SEWER LIEN INTEREST TO TAX TITLE -TT	\$ 15,404	\$ 16,809	\$ 24,950	\$ 25,037	\$ 25,415
SEWER LIEN TO TAXES -TT	\$ 126,107	\$ 133,896	\$ 193,341	\$ 187,134	\$ 200,366
TOTAL SEWER	\$ 141,510	\$ 150,705	\$ 218,291	\$ 212,171	\$ 225,781
TOTAL	\$ 288,493	\$ 303,301	\$ 414,991	\$ 365,718	\$ 444,098

While the number of water and sewer accounts in tax title have decreased, the dollar amounts have increased from \$288,493 to \$444,098 over the past five years, a 55% increase.

The following table presents the amounts of water and sewer liens collected in tax title.

DESCRIPTION	FY06	FY07	FY08	FY09	FY10
WATER					
WATER LIEN TO TAX BILL -TT	\$ 108,225	\$ 109,898	\$ 136,507	\$ 44,439	\$ 47,459
COMM INT FOR WATER LIEN ON TAX BILL -TT	\$ 13,033	\$ 13,505	\$ 17,003	\$ 6,118	\$ 6,270
TOTAL WATER	\$ 121,258	\$ 123,403	\$ 153,510	\$ 50,556	\$ 53,729
SEWER					
SEWER LIEN INTEREST TO TAX TITLE -TT	\$ 12,784	\$ 14,017	\$ 19,359	\$ 7,543	\$ 5,679
SEWER LIEN TO TAXES -TT	\$ 104,647	\$ 109,252	\$ 152,168	\$ 51,275	\$ 41,141
TOTAL SEWER	\$ 117,432	\$ 123,269	\$ 171,527	\$ 58,817	\$ 46,820
TOTAL	\$ 238,690	\$ 246,672	\$ 325,037	\$ 109,374	\$ 100,549

The trend on dollars collected is similar to the number of water and sewer utility liens that are in tax title with declines in FY 2009 and 2010.

6D - Review the Policies, Procedures, and Practices Of The City Collections Department for Transfer/Sales of Property and for Liening Past Due Accounts Including:

6D.1 Issuing Municipal Lien Certificates at Time of Transfer of Property

When homeowners sell their homes, or other real estate is sold or transferred, a Certificate of Municipal Lien is requested to obtain any and all charges against the property from a municipality that are, as of that date, outstanding. This document is considered to be everything that is owed in back taxes and other charges, such as water/sewer, trash pick-up, and any other charges for services that are committed to the Tax Collector for collection. At the time of the closing of a real estate transaction, the Certificate of Municipal Lien can be recorded at the Registry of Deeds as proof that all charges the municipality has relative to the property, except the ones noted on the certificate, are paid in full.

Municipal Lien certificates (MCLs) are issued "with-in a few days of being requested" and can be updated, via FAX on the date of closing the sale/transfer. The municipal lien certificates clearly state on them to order a final reading of water meters. A clerk in the Collector's Office would also type on the certificate "plus water/sewer bill". A copy of the municipal lien certificate appears in Appendix 2-6.3. The step by step process of preparing a Municipal Lien Certificate can be found in Appendix 2-6.4. A blank application for a certificate of municipal lien can be found at Appendix 2-6.5, with the fee schedule for various types of properties at Appendix 2-6.6.

The City has a form for requesting a Municipal Lien Certificate which can be obtained in the Tax Collector's Office or can be downloaded from the City's website. The fee, as per the schedule of fees for Municipal Lien Certificates, must accompany the completed form submitted in person or mailed to the Tax Collector's Office.

The Collector's Office normally processes between 5,000 and 7,500 requests for Certificates of Municipal Lien each year. The Tax Collector was unable to provide numbers of Lien Certificates provided over the last five years; the City Auditor's records show revenue as follows:

FY	Amount
2007	\$ 134,577
2008	\$ 117,956
2009	\$ 129,190
2010	\$ 121,193
2011	\$ 83,518 *

**Thru March 9, 2011*

For Fiscal year 2007 and prior, the charge for a Municipal Lien Certificate was \$25 regardless of the type of property. In Fiscal year 2008, rates were raised as per the chart shown in Appendix 2-6.6.

6D-2 Handling Past Due Balances for Tax Exempt Parcels

Tax exempt properties receive a \$0.00 tax bill with liens shown in the spaces for liens. Utility liens are added to the tax bills automatically with all other liens in December of each year and include amounts through the end of the prior fiscal year like all other water/sewer liens including interest up to the date the lien is placed on the property.

6E Review the Lien Posting Process and MUNIS Utility Billing Past Due Balance Clearing once Liens have been posted.

MUNIS has a feature called "transfer delinquent to tax" (see 2-6.7) which the Collector/Treasurer uses to automatically transfer the balances outstanding to Utility Liens added to Tax. These balances will appear on the tax bill as utility liens and are removed from the Water/Sewer Receivable automatically. The Tax Collector will run the "transfer to delinquent tax" procedure in early December of each year and receive a printed listing of all outstanding amounts that are to be committed as Liens Added to Taxes. The Collector will transmit this listing to the Board of Assessors who will prepare a commitment document directing the Tax Collector to collect the amounts specified next to the names of those accounts that are uncollected and are being added to Real Estate Taxes. Refer to section 6C of this Technical Memorandum for additional comments.

6E-1 Continue Tracking of Selected Accounts through Liens Posted In the Collector's Office (Task 6D-2)

The tracing of selected accounts is discussed in Task 2-5. Refer to Technical Memorandum 2-5 and Appendix 2-5.3.

RECOMMENDATIONS

1. The City should hire an independent MUNIS expert to review the department's use of MUNIS and identify new programs or practices that could improve efficiency (same recommendation as in Technical Memorandum 2-4).
2. The City should provide mandatory training sessions for the Billing Office which should be scheduled for all billing clerks using the MUNIS software by MUNIS personnel. Training should also be given to supervisory personnel on what the MUNIS software can do for them (same recommendation as in Technical Memorandum 2-4).
3. The City should provide refresher MUNIS training for the Collector's staff.

4. A copy of the Commitment document should be forwarded to the City Auditor without the list of delinquent payers when adding water and or sewer liens to taxes.
5. The City should address the large number of unpaid user charges that are liened. While Massachusetts General Laws allows unpaid user charges to be added to taxes as a lien, the large number of liens added to taxes creates a burden in the City's revenue budgeting that relies on large revenue dollars to be collected by June 30.
6. The City should create a file of municipal lien certificates so the number of MCLs is readily available.
7. The City should accept two sections of Massachusetts General Laws dealing with deferrals, Chapter 83, Section 16G for sewer and Chapter 40 Section 42J for water.
 - a. 83:16G allows the City to defer sewer charges if a property owner is receiving an exemption from property taxes under clause 41A of section five of chapter fifty-nine.
 - b. 40:42J allows the City to defer water charges if a property owner is receiving an exemption from property taxes under clause 41A of section five of chapter fifty-nine.
8. The City should send follow-up bills to utility users within a week after they become delinquent. This reminder should enhance collections.
9. Abatements should be processed by the same people all the time and these people should not have access to the bills in commitments. There needs to be a separation of duties.
10. Abatements should be given to the Commissioner for his approval prior to being entered into MUNIS. They should be processed no more frequently than weekly and should be processed in numbered batches for look-back purposes as well as for leaving an audit trail. Numbering should be by fiscal year and consecutive commitments done that fiscal year (i.e. 2011-1, 2011-2 and so forth).
11. Any Commitment document produced should also be provided to the Tax Collector separate from the individual bills which are posted to his records electronically as he is legally responsible for collections. Commitments should be numbered consecutively for each fiscal year by commitment type.
12. Commitment and Abatement Schedule numbers should appear in the records of each bill committed and abated for audit trail purposes.
13. Checks and cash should only be accepted in the Office of the Tax Collector. The Collector is able to give receipts as proof of payment for any service provided or to be provided by the DPW so it will be clear to personnel who schedule work that any fees have been paid.

We recognize that recommendations 9,10, and 13 could potentially cause inefficiency and hardships to people paying at the last moment. However, our recommendations are focused to strengthen internal control and minimize risk.

CITY'S RESPONSE TO OUR DRAFT TECHNICAL MEMORANDUM 2-6

The City's response to our draft Technical Memorandum 2-6 is summarized in this section and is included as Appendix 2-6.7. These changes have been incorporated or have been referenced.

Page 3 Section B.1 second to last paragraph: There is no form to fill out. The sentence should read; City Hall to discuss their bill. The confusion may lie in the fact that the Ward 6 Councilor had made up a form which we never received or the ATB form which we used before Feb 1, 2011.

Last paragraph: The DPW does not perform a die test for people nor do we supply tablets. We do however explain how to do a die test and suggest they use food coloring.

Page 4 first paragraph should be rewritten as follows: If the meter tests inaccurate, the billing office will refund the \$75.00 fee and replace the meter. The new meter will be monitored for usage for 90 days and that usage may be averaged to determine past average usage as per the Procedure codified in July 2010. If the meter tests accurate, the current bill stands as issued. This is discussed in under Task 2-7 in more detail.

Second paragraph: due should be do

Recommendations 9,10, and 13 could potentially cause inefficiency and hardships to people paying at the last moment. Also, while it would be nice to have staffs sufficiently large enough to have separation of duties, I don't know if that can be accomplished.

APPENDICES

- Appendix 2-6.1: City Correspondence
- Appendix 2-6.2: State Appellate Tax Board Appeals
- Appendix 2-6.3: Municipal Lien Certificate
- Appendix 2-6.4: Municipal Lien Certificate Procedures
- Appendix 2-6.5: Municipal Lien Certificate Application
- Appendix 2-6.6: Municipal Lien Certificate Fee Schedule
- Appendix 2-6.7: Utility Billing Transfer Delinquent to Tax
- Appendix 2-6.8 City Response to the Draft Technical Memorandum 2-6

APPENDIX 2-6.1: CITY CORRESPONDENCE

From: Balzotti Linda
Sent: Friday, January 07, 2011 1:47 PM
To: City Council Members
Cc: Thompson Kenneth
Subject: utility billing and real estate tax billing

Dear Councilors,

In light of the recent discussion and some apparent misinformation regarding water/real estate bills. I directed John Condon, CFO and Martin Brophy, Treasurer/Tax collector, to compile a comprehensive explanation of the process as well as the consequences if we deviated from the process. Please understand that we have not recorded any of these liens at the registry nor will we until and unless we do a tax taking on the property which would be several years from now. I believe you will find the information to be informative and helpful. If you have any questions on the information in the body of the email or the attachments, I am sure Mr. Condon and/or Mr. Brophy would be more than happy to answer them. Thank you.

Linda M. Balzotti
Mayor
City of Brockton
45 School Street
Brockton, MA
508.580.7123
508.559.7960 (f)

From: Condon John
Sent: Friday, January 07, 2011 1:12 PM
To: Balzotti Linda; Thompson Kenneth
Subject: utility billing and real estate tax billing

Good afternoon –

You have asked us to provide commentary on the summaries of the statutory procedures for utility charge billing and real estate tax billing which were created by Treasurer/Collector Marty Brophy for distribution to the members of the city council, especially in light of the recent mailing of the third quarter tax bill, to which unpaid utility charges had been committed for some 6500 accounts. This email will respond to that request.

From the attached summary from Marty, you can see that the city's utility charges are produced by the DPW Department, which is the issuing authority, on a quarterly basis each fiscal year. Typically, the bills are mailed early in the months of August, November, February and May, with due dates within 30 days of the issue date. Bills which have not been paid in full by the due date are subject to an interest charge of 14% per annum. State law provides a number of mechanisms for the city to employ in the collecting of unpaid utility charges. By force of law, the unpaid charge and associated costs becomes a lien on the real estate. The statutes also provide for the recording of this lien by the Registry of Deeds, but of course the Registry must be notified. The lien remains in effect for a defined period of time, to be discussed below, or until the charge has been added to or committed as a tax to a real estate bill. The period of time

referred to above is related to the year of issue. So, if an unpaid charge was incurred in FYxx, the lien automatically comes into effect by force of law when the charge became overdue; if the charge isn't paid or abated, it remains in effect until it is committed as a tax, but if that hasn't occurred during the next fiscal year (FYxx+1) or year subsequent to (FYxx +2), then the lien expires on Oct. 1 of the third fiscal year (FYxx+3). So an unpaid charge from FY10 has an automatic lien placed on the real estate property, not by action of the city or collector but by force of law, but that protection expires on Oct. 1 of FY 13, unless the city has committed the charge to the real estate tax bill. That action affords protection to the city in enforcing its rights as described in the attachment.

It is important to have some discussion on the issue of committing the unpaid charges to the real estate tax. First of all, that action can only take place on a "real" tax bill, not an estimated bill. The attachment deals with this in more detail, but in summary, in Massachusetts, the law provides that the "actual" tax bill is prepared by the assessors after the tax rate has been set by the city council and approved by the DOR. The tax rate setting requires certification by the DOR of the city's real estate values and assurance that the provisions of Prop. 2 ½ have been complied with respect to levy limitations and requirements surrounding the decision on splitting the tax rate so that CIP carries some of the residential burden. In any case, that process normally occurs in the fall, so the city is allowed to create an estimated bill for the first half year, and an actual bill certified by DOR for the second half year. By law, we are allowed to split the estimated and real bills in half to allow for quarterly billing. But the real bill occurs after DOR's certification, when the assessors are preparing the tax list. At his time, the unpaid rates or charges are committed as a tax. Note that there is no discretion as to timing; committing any unpaid charges as taxes must be done on an actual tax bill. So, if the city were to have delayed this action, we'd have had only two choices under the law. If we wanted to obtain the protection of our rights of collection under the law, we could have delayed the mailing of the third quarter bill and issued a single bill for the second half of the fiscal year. This would have meant that property owners would have been faced with paying the entire second half property tax plus the full amount of the levy increase on one bill. Alternatively, we could have delayed the action until the issuance of the actual tax bill for FY12. This decision would have had a very serious impact, which I'll discuss below.

In Brockton, a substantial number of the city's rate payers do not pay when the charges are due; rather, they wait until the charge has been committed to the real estate bill. After that time, either the tax payer makes payment or the mortgage company does. For example, in FY10 approximately 6500 accounts had unpaid charges added to the tax bills in the amount of almost \$8 million; in FY 11, about the same number were committed for almost \$9 million. If you examine the city's revenue receipts for water and sewer, you will see that a disproportionate amount of revenue historically is received in the fourth quarter, with the largest receipts as late as June. This is happening because of rate payers waiting for the utility charges to be committed to the tax bill. For example, in FY09, at the end of April, 20% of sewer and 21% of water revenue ultimately collected for the year was uncollected with only two months to go. By the end of May, 14% was still uncollected. (If the revenues were collected evenly over the year, 8 or 9 % per month would be collected.) The same pattern can be shown in FY10: about 20 % of the year's total uncollected at the end of April and 10 to 15% still uncollected in May. We can assume that failing to commit unpaid charges to the real estate bill would result in a penalty of at

least 3 to 5% of revenues uncollected which otherwise would have been by the end of year FY 11. Even if only 3 %, that amounts to about \$1 million. The utility budgets are tightly constructed. If we have a revenue shortfall which causes a deficit, then we must recover that deficit in the subsequent fiscal year. That can be accomplished by a rate increase, or by paying the deficit with general fund revenues. FY 12 will be a difficult budget in any case, and I don't think any of us want to make the problem worse by \$1 million or more. For that reason, we don't think that delaying the process of committing unpaid utility charges to the FY12 actual tax bill would have been a good idea. Accordingly, we took action now.

A couple of other points should be made. First, those citizens who have had unpaid utility charges added to their bills who wish to dispute the utility charge and pay only the real estate amount, should so indicate to the city. The most certain way for them to do so is to pay the bill in person in city hall, but they may also so communicate in writing. (Interest charges will accrue on unpaid amounts unless the city ultimately abates the bill.) Second, we'd like to reemphasize that the city's recent action did not create a lien on the properties of those who didn't pay their bills. The lien was established by law by the failure to pay, at the time that the bill became overdue. Our steps simply protected the city's financial interest, and if people's charges are ultimately deemed to be erroneous, corrective action can be taken.

If you have any questions, please call either one of us.

John A. Condon, CFO

Martin S. Brophy, Treasurer/Collector

APPENDIX 2-6.2: STATE APPELLATE TAX BOARD APPEALS

**LIST OF ALL RESIDENTS WHO FILED FOR APPELLATE TAX BOARD
ON / OR BEFORE FEBRUARY 1, 2011 DEADLINE**

<u>ADDRESS</u>	<u>OWNER/ FILER'S NAME(S)</u>	<u>ACCOUNT #</u>
1) 61 BONNEY ST	ROBERT & CHRISTINE FORD	3-7697
2) 142 WOODARD AVE	JOHN H. GREEN	2-5984
3) 35 WALNUT STREET	ANGELO KOSTOULAS	3-2624
4) 38 SKINNER STREET	DOMINGOS FONTES	1-6444
5) 54 PARKER AVE	ERIN MCCARTHY	1-8207
(2 FILINGS FOR SAME ADDRESS)		
6) 14 SHEPPARD AVE	SHEPPARD AVE REALTY	1-5381
7) 41 SIMMONS AVE	PATRICIA BURTON	2-6902
8) 18 DOROTHY RD	DARLENE ABRAMSON	3-5883
9) 8 CORALA RD	AYANNA CATO	3-5888
10) 775 N MONTELLO ST	EDWARD & RUTH HOPE	3-1861
11) 929 COURT ST	JORGE GUTIERREZ	1-5096
(2- FORMS SUBMITTED; 1- 2009 & 1- 2010)		
12) 106 QUINCY AVE	WILLIAM & DONNA COSTA	1-9156
13) 118 CANDY LN	WILLIAM WOODLEY	2-9172
14) 81 N WARREN AVE	MONICA RUSTICI	3-1932
15) 68 N WARREN AVE	MONICA RUSTICI	3-1928
16) 97 SPRING ST	MONICA RUSTICI	3-2504
(RECEIVED DUPLICATE APPLICATION)		
17) 33 SHERIDAN ST	SUSAN & THOMAS RAMOS	1-3351
18) 220 N MAIN ST	HERBERT MATTA	3-1499
19) 153 NORMAN RD	KAREN BACKER	3-5713
20) 16 PAULIN AVE	DEBORAH FLETCHER	1-3543
21) 603 MONTELLO ST	TROJANO FAMILY SERIES, LLC (JUDITH TROJANO)	1-1736
22) 557 MONTELLO ST	MICHAEL & ROSEMARY HATZINIKOLAU	1-8102
23) 38 HOWARD SQ	MICHAEL & ROSEMARY HATZINIKOLAU	2-1696
24) 411 WARREN AVE	MICHAEL & ROSEMARY HATZINIKOLAU	1-3258
25) 32 ALLEN AVE	PAUL & TINA TSARHOPOULOS	1-0036
26) 390 BELMONT ST	PAUL & TINA TSARHOPOULOS	2-0325
27) 172 FOREST AVE	PAUL & TINA TSARHOPOULOS	2-1064
28) 138 GREEN ST	PAUL & CONSTANTINA TSARHOPOULOS	2-5365
29) 26 LILLY AVE	PATRICIA TSARHOPOULOS	2-1872
(RECEIVED DUPLICATE APPLICATION)		
30) 156 TRIBOU ST	NATHANIA ONYEAGORO	2-3146
(RECEIVED DUPLICATE APPLICATION)		
31) 39 AMES ST	G.V. REALTY TRUST	3-3020
32) 962 N MAIN ST	GABRIEL VOLPE (REFUSE & WATER)	3-1650
33) 59 BANKS ST	GABRIEL VOLPE	3-0188
34) 195 (193) AMES ST	GABRIEL VOLPE (REFUSE)	3-0075
35) 20 JOHNSON CT.	GABRIEL VOLPE (REFUSE)	3-1199
36) 59 ALBION ST	ONUJIOGU IFEOMA	3-0026
37) 151 AMES ST	EUNICE MOREIRA	3-0063
<u>ADDITIONAL APPLICATIONS RECEIVED (FILED DIRECTLY W/ APPELLATE TAX BOARD)</u>		
38) 13 GEORGE ST	PIERRE S. & RICARDO BOLIVAR	1-9148
<u>APPLICATION RECEIVED IN ASSESSOR'S & SENT TO OUR OFFICE ON MARCH 1, 2011(LATE)</u>		
39) 421 WINTER ST	FARIS GHAZI & NORMA GARDIKI'S	3-9969

APPENDIX 2-6.3: MUNICIPAL LIEN CERTIFICATE



document 36

Municipal Lien Certificate
City of Brockton
Commonwealth of Massachusetts

Requested By

Issuance Date

REED, ADAMI & KAISER

01/18/2005

I hereby certify from available information that all taxes, assessments and charges now payable that constitute liens as of the date of this certificate on the parcel of real estate specified in your application received on 01/14/2005 are listed below.

Description of Property

Parcel ID: 099-088	Location: 932 N MAIN ST		
Deed Date: 09/01/1993	Book/Page: 12170/00179		
Owner: CALVARY MISSIONARY BAPTIST CHURCH PO BOX 2155 BROCKTON MA 02305	Land Area: 0.86 AC	Land Use: 0	
	Land Value: 160,480	Exemptions: 0	
	Impr Value: 60,920	Taxable Value: 221,400	

Fiscal Year

2005

2004

2003

DESCRIPTION

REAL ESTATE TAX COMMERCIAL	.00	4,879.34	.00
REFUSE LIEN INTEREST TO TAX BI	5.10	26.69	.00
REFUSE LIEN TO TAXES	70.00	220.00	.00
SEWER LIEN INTEREST TO TAX BIL	.95	3.25	.00
SEWER LIEN TO TAXES	13.00	25.47	.00
WATER LIEN TO TAX BILL	76.00	312.51	.00
COMM INT FOR WATER LIEN ON TAX	5.53	38.01	.00
<hr/>			
TOTAL BILLED:	170.58	5,505.27	.00
Charges/Fees	.00	5.00	.00
Abatements/Exemptions	.00	.00	.00
Payments/Credits	.00	.00	.00
Interest to 01/18/2005	.00	654.15	.00
<hr/>			
TOTAL BALANCE DUE:	170.58	6,164.42	.00
TOTAL INTEREST PER DIEM:	2.10		

THIS PROPERTY IS TAX EXEMPT. THE TOTAL VALUATION ON THIS PROPERTY IS \$221,400.

James F. Martelli, Jr.

There is a 14.0% interest charge on all unpaid bills from the Due Date of the bill. Please notify the Water Department, at 508-680-7143, of any change of ownership, to request a final reading, and check on any Construction Bills to be issued.

James F. Martelli, Jr.
James F. Martelli, Jr.
Treasurer/Collector

APPENDIX 2-6.4: MUNICIPAL LIEN CERTIFICATE PROCEDURES

MUNICIPAL LIEN CERTIFICATE

GET A WORKING COPY:

CLICK ON PROPERTY REVENUES
CLICK ON PROPERTY TAX BILLING (F)
CLICK ON MASSACHUSETTS (B)
CLICK ON COLLECTION PROCESSING (D)
CLICK ON MUNICIPAL LIEN CERTIFICATE (K)
CLICK ON DEFINE
ENTER PARCEL ID
CLICK ON GREEN ARROW OF HIT ENTER
TYPE IN WC (WORKING COPY)
CLICK TO NEXT CERTIFICATE NO CLICK ON (+1)
HIT ENTER
PRINT

DO A MUNICIPAL LIEN CERTIFICATE

CLICK ON PROPERTY REVENUES
CLICK ON PROPERTY TAX BILLING (F)
CLICK ON MASSACHUSETTS (B)
CLICK ON COLLECTION PROCESSING (D)
CLICK ON MUNICIPAL LIEN CERTIFICATE (K)
CLICK ON DEFINE
ENTER PARCEL ID
CLICK ON GREEN ARROW OR HIT ENTER
TYPE IN NAME OF PERSON REQUESTING MLC
CLICK OVER TO APPLICATION DATE AND PUT IN DATE RECEIVED
CLICK ON NEXT CERTIFICATE NO CLICK ON (+1)
ENTER
CLICK ON CERTIFICATE TEXT
TYPE IN ADDITIONAL INFORMATION
EX: UB BILLING PER DIEMS SEE EXAMPLE
EX: TAX TITLE INFORMATION SEE EXAMPLE
EX: ANY SUBDIVISION INFORMATION SEE EXAMPLE
EX: CONDO INFORMATION SEE EXAMPLE
X OUT OF CERTIFICATE TEXT
CLICK YES TO SAVE
HIT PRINT FOR MLC (GREEN PAPER)

MAKE COPY OF MLC
ORIGINAL GOES IN MAIL
COPY GOES WITH REQUEST AND FILED

APPENDIX 2-6.5: MUNICIPAL LIEN CERTIFICATE APPLICATION



City of Brockton
Collector's Department

20

Dear Sir:

Please furnish me, in accordance with Section 23B, Chapter 60, General Laws, a statement of all taxes and assessments which at this time constitute liens on the following property.

Estate assessed to _____

Known as Plot No. _____ Street

Street No., if any _____

Condo Unit No., if any _____

On Map/Route/Suffix _____ which is on file at the office of the Assessors of the City of Brockton.

EFFECTIVE MAY 1, 2008 THE LEGAL FEE FOR A MUNICIPAL LIEN CERTIFICATE HAS CHANGED. PLEASE SEE BACK OF FORM FOR A NEW SCHEDULE

PLEASE NOTE: A LIEN CERTIFICATE TAKES 10 WORKING DAYS.

Requested by: (please print)

Name: _____

Street: _____

Town: _____

Telephone: _____

Be accurate on the number of plot and Map/Route/Suffix, which can be obtained at office of the Assessors in City Hall, Brockton. No other description will sufficiently identify the property.

THE APPROPRIATE LEGAL FEE FROM THE SCHEDULE ON THE BACK OF THIS FORM MUST BE PAID AND FORWARDED WITH THIS APPLICATION PLEASE ENCLOSE A LEGAL SIZED SELF- ADDRESSED STAMPED ENVELOPE

APPENDIX 2-6.6: MUNICIPAL LIEN CERTIFICATE FEE SCHEDULE

FEE SCHEDULE
(EFFECTIVE MAY 1, 2008)

<u>RESIDENCES</u>	<u>STATE CLASS CODE</u>	<u>FEE \$</u>
SINGLE FAMILY	101	\$25.00
RESIDENTIAL CONDOMINIUM	102	\$25.00
TWO FAMILY	104	\$25.00
THREE FAMILY	105	\$25.00
MULTIPLE HOUSES	109	\$25.00
RESIDENTIAL MIXED USE	013	\$25.00
<u>APARTMENTS</u>		
APARTMENTS 4-8 UNITS	111	\$100.00
APARTMENTS 9+ UNITS	112	\$100.00
GROUP QUARTERS	121-125	\$100.00
CHILD CARE FACILITY	140	\$100.00
<u>COMMERCIAL</u>		
COMMERCIAL	300-389	\$150.00
COMMERCIAL MIXED USE	031	\$150.00
<u>INDUSTRIAL</u>		
INDUSTRIAL	400-413	\$150.00
UTILITY	420-428	\$150.00
UTILITY COMMUNICATION	430-433	\$150.00
ELECTRIC GENERATION PLANTS	450-452	\$150.00
<u>LAND</u>		
FOREST LAND	601	\$50.00
FARM LAND	710-722	\$50.00
RECREATIONAL LAND	801-814	\$50.00
LAND EQUAL TO OR GREATER THAN ONE ACRE	106	\$50.00
	130-132	\$50.00
	390-393	\$50.00
	440-442	\$50.00
LAND LESS THAN ONE ACRE	106	\$25.00
	130-132	\$25.00
	390-393	\$25.00
	440-442	\$25.00

**APPENDIX 2-6.7: UTILITY BILLING TRANSFER DELINQUENT TO
TAX**

UB Transfer Delinquent to Tax

MUNIS
 Procedure to Lien
 Utility bills to Taxes

Overview

The Transfer Delinquent to Tax program transfers delinquent utility bills to tax records.

Prerequisites

Before you use this program, open the Charge Code FM program and ensure tax charge codes with an activity of SPAP and SPAI exist for the tax year to which utility bills are to be transferred. In addition, on the Utility Billing Auxiliary Programs menu, click Charge Code FM. On the GL Accounts tab, ensure the tax lien charge codes are correct.

Following are common errors that may appear on the UB Tax Levy Report:

- If No Parcel displays in the Error column, the Totals are zero until the account is corrected. This indicates the parcel found in the Account Master Maintenance program is blank for the corresponding utility billing account or does not match the parcel in the Parcel FM program.
- If Inactive displays in the Error column, this means the parcel status is Inactive in the Parcel FM program.

Procedure

Use the following steps to create your preliminary taxes:

1. Open UB Transfer Delinquent to Tax.

Property Revenues > Utility Billing > Lien Processing Menu > Transfer Delinquent to Tax

2. Click the Define button.
 Enter these fields

Execute this Report	<p>You are in the list that allows you to use MUNIS Scheduler to process the report. MUNIS Scheduler uses the report criteria you establish to process the report a single time if you select In Background (now) or At a Scheduled Time.</p> <p>MUNIS Scheduler uses the report criteria you establish to process the report multiple times if you select At a Scheduled Time and establish a recurring schedule.</p> <p>The program does not use MUNIS Scheduler if you select Now; the program uses the report criteria you establish to process the report a single time.</p>
ROUTE	These boxes determine the range of routes to include in the transfer. The default values are a blank value to all Zs.
Charge Code	<p>These boxes determine the range of charge codes to include in the transfer.</p> <p>The default values are a blank value to all Zs.</p>
Bill Due Date	These boxes determine the range of bill due dates to include in the transfer.
District	<p>These boxes determine the range of districts to include in the transfer.</p> <p>The default values are a blank value to ZZ.</p>
Exclude Special Condition Codes	This group of boxes define the special condition codes on accounts to exclude from the transfer to tax process.
Base Minimum On	This group that determines whether the Minimum Delinquent Amount is based bill detail or account totals.
Print Report As	This option determines whether or not a detail report by bill number or summary report by parcel identification number is printed.
Sort Report By	This group determines the order in which the report is sorted.
Minimum Delinquent Amount	This box determines the minimum delinquent amount required for a utility bill to be transferred to tax.
Transfer Bill Year	This box determines the year from which delinquent bills are transferred.
Transfer Bill Installment	Enter transfer bill installment (1,2,3, or 4)
Calc Interest Date	<p>This box determines the date to which interest is calculated.</p> <p>The current date is the default date.</p>
Posting Year	<p>This box determines the year in which general ledger journal entries are posted.</p> <p>The default year is established in the GL Parameter FM program.</p>
Period	This box determines the period or accounting month in

	<p>which general ledger journal entries are posted.</p> <p>The default period is established in the GL Parameter FM program</p>
Reference	This box determines the reference entered on the journal entry in the Journal Inquiry/Print program.
Reason Code	<p>This list stores the code for the reason to transfer utility bills to tax.</p> <p>Reason Codes are established in the Exemption/Discount Codes FM program.</p>
Flat File Name	This box contains the name for the export file.
Path	This box displays the path for the entered file name.
Subtotal by Summary Code	This check box, if selected, directs the program to include summary code subtotals.
Use Delinquent-To Name	<p>This check box, if selected, determines whether or not the delinquent-to name established in the Account Master Maintenance program on the Billing Info tab should be used to determine which name displays on the delinquent account.</p> <p>If you select the check box and the Delinq To list is Owner, then the current utility account owner is used. If you select the check box and the Delinq To list is Customer or Both, then the name on the utility bill header is used.</p>
Update UB/AR/GL	This check box, if selected, determine whether or not MUNIS® Utility Billing, Accounts Receivable, and General Ledger records are updated as the result of utility bills being transferred to tax.
Processing	The program displays the number of records during processing.
Total Records	The program displays the number of records processed.

3. Click the Generate button.
4. Click Flag to Levy
5. Click File > Output to print the report.
6. Click Process

Results

The UB Transfer Delinquent to Tax has moved the records to Special Assessment FM on the tax side.

Status Change

The UB records are set to Lien.

GL Impact

An entry is made to the General Ledger.

What's Next?

- Apply Special Assessments

**APPENDIX 2-6.8: CITY'S RESPONSE TO THE DRAFT TECHNICAL
MEMORANDUM 2-6**

Subj: **FW: 2-6**
Date: 5/6/2011 3:16:08 P.M. Eastern Daylight Time
From: jcondon@ci.brockton.ma.us
To: bettergov@aol.com
fyi

From: Thoreson Michael
Sent: Friday, May 06, 2011 11:46 AM
To: Condon John; Chuckran Heidi
Cc: Hambly Alisa; Czaja Elaine; Rowley Larry; Creedon Brian; Troxell April
Subject: FW: 2-6

Jay,

Comments of TM 2-6:

Page 3 Section B.1 second to last paragraph: There is no form to fill out. The sentence should read; City Hall to discuss their bill. The confusion may lie in the fact that the Ward 6 Councilor had made up a form which we never received or the ATB form which we used before Feb 1, 2011.

Last paragraph: The DPW does not perform a die test for people nor do we supply tablets. We do however explain how to do a die test and suggest they use food coloring.

Page 4 first paragraph should be rewritten as follows: If the meter tests inaccurate, the billing office will refund the \$75.00 fee and replace the meter. The new meter will be monitored for usage for 90 days and that usage may be averaged to determine past average usage as per the Procedure codified in July 2010. If the meter tests accurate, the current bill stands as issued. This is discussed in under Task 2-7 in more detail.

Second paragraph: due should be do

Recommendations 9,10, and 13 could potentially cause inefficiency and hardships to people paying at the last moment. Also, while it would be nice to have staffs sufficiently large enough to have separation of duties, I don't know if that can be accomplished.

Mike

Michael L. Thoreson
Commissioner DPW
45 School Street
Brockton, MA 02301
(508) 580-7135

From: Condon John
Sent: Monday, May 02, 2011 5:13 PM
To: Thoreson Michael; Brophy Martin; Czaja Elaine; Rowley Larry; Sullivan Paul; Creedon Brian
Subject: FW: 2-6

From: BETTERGOV@aol.com [mailto:BETTERGOV@aol.com]
Sent: Sunday, May 01, 2011 11:41 AM
To: Condon John; Chuckran Heidi
Cc: TFedder@woodardcurran.com; dandrew18@comcast.net; Bettergov2@aol.com; Bettergov@aol.com; edbryan@crystalreportingsolutions.com
Subject: 2-6

Attached.
=