



Prioritizing Communities Working Group

Report on Emergency Rental Assistance Challenges, Lessons Learned, and Best Practices January 2021

BACKGROUND

HouseATL is a collaborative composed of public, private, nonprofit, and philanthropic leadership that has engaged more than 200 civic leaders and 80+ organizations committed to building the political and community will for a comprehensive and coordinated housing affordability action plan for Atlanta. The collaborative uniquely brings together business, government, nonprofit, philanthropy, and other community leaders to coordinate and innovate on how we develop and preserve affordable housing, address displacement in Atlanta's neighborhoods, and promote financial stability and homeownership as a means to wealth building.

In 2018, HouseATL released eight guiding principles and 23 recommendations that defined the problems, identified the barriers to success, and engaged in thoughtful problem-solving so that civic leadership in the City of Atlanta would have a shared, comprehensive set of policies and adequate funding to address affordability and displacement. The City of Atlanta One Housing Plan, released in May 2019, built upon the HouseATL recommendations to articulate the specific goals and action steps for the city and its agencies. At a high level, these requirements were: 1) A \$1 billion investment over eight to ten years, 2) A focus on community retention to ensure investment without resident displacement, 3) Working together within and across sectors to coordinate and collaborate, and 4) Educating and engaging stakeholders and residents.

Within the HouseATL structure, the Prioritizing Communities Working Group (Prioritizing Communities) was formed because low- and moderate-income residents and businesses of the City of Atlanta's predominantly Black and Brown neighborhoods are not able to prosper in place due to the significant market investments around them. Prioritizing Communities named four areas of vulnerability for displacement to explore in 2019, which were:

- eviction prevention
- strengthening renter protections
- helping homeowners manage rising tax bills; and
- retaining legacy businesses as keepers of culture and job opportunities.

Focus on Emergency Rental Assistance

Throughout 2019, Prioritizing Communities received testimony on all these issues but found there was particular urgency for focused attention on the sector that provides emergency assistance to families facing eviction. In a time of tremendous stress, families facing eviction must navigate a system which is

both well-meaning and disjointed. The goal of helping families is diluted by a lack of coordination and consistently available financial resources.

At the beginning of 2019, Prioritizing Communities engaged in a year-long “deeper dive” into the issue of short-term and emergency assistance in the City of Atlanta with an advisory group comprised of providers of emergency assistance and other partner agencies whose clients utilized emergency financial assistance. The advisory group met independently, and with the larger Prioritizing Communities Working Group, to assess the full ecosystem of short-term, emergency financial assistance providers who serve renters facing displacement. Through an initial “discovery phase,” the advisory group conducted an extensive survey of the provider landscape, gathering data from nearly twenty providers ranging from large organizations disseminating over \$1 million in assistance annually to congregations and smaller community-based organizations that disseminate under \$10,000 annually.

Pulling from that data and the feedback gathered through in person meetings, the advisory group determined that further work was needed to assess and improve ecosystem capacity at three levels:

1. Capacity to collect and make available regularly updated information on which organizations have assistance available and for whom (i.e., geographic limitations, other eligibility requirements).
2. Capacity at provider organizations for disseminating assistance effectively and efficiently to residents at a time of crisis.
3. Capacity in terms of both the overall amount of emergency housing assistance funds available in relation to the level of need, and the geographic distribution of those funds related to areas of heightened need.

At the close of 2019, the advisory group and the Prioritizing Communities Working Group reached consensus that, in order to move toward change, the provider network itself needed to come together to participate in a professionally facilitated process to develop recommendations around the three identified areas of capacity.

The World Changes

Heading into 2020, Prioritizing Communities’ plan to fund this third-party-facilitated work was – along with the rest of the world – derailed by COVID-19. Subsequently, many of the providers who had engaged in the year-long process with Prioritizing Communities were tapped to administer a variety of COVID-19-related emergency rental assistance programs, most notably the high-volume of CARES Act funding that went to regional governmental entities. HouseATL’s Prioritizing Communities Working Group, whose members included most if not all of those providers, continued to meet throughout the pandemic, with even more focus on the housing instability COVID-19 was driving, its disproportionate impact – yet again - on people-of-color, and the community’s response.

The pressure on municipalities to rapidly design and deploy these federally-funded COVID-related assistance systems, combined with the federal restrictions on those funds, created serious challenges for municipalities and providers alike. Programs had to be launched before many of the systems could be “stress tested.” Funds had to be distributed before many best practices emerged or could be implemented. Against that backdrop, Prioritizing Communities provided a forum for those providers and the broader community to share information about, and their experiences with, the provision of emergency rental assistance. In particular, the experiences of those Prioritizing Communities members who were administering those funds greatly accelerated Prioritizing Communities’ learning process and

resulted in many lessons learned. Those lessons, and the best practices they suggest, are reflected in this report.

EXECUTIVE SUMMARY

The rental assistance programs that will most effectively and rapidly respond to a high-volume of residents will have certain things in common. Those programs will adjust requirements to lessen the administrative burden on service providers and not add additional requirements to client eligibility beyond that outlined in federal guidelines. Effective programs will be those that establish clear guidelines up front and avoid mid-program changes, and generally ease restrictions where feasible to allow providers to distribute high volumes of funding rapidly while still submitting required documentation. Moreover, successful and sustainable programs will be those that ensure sufficient provider administrative and staff funding, and trust and empower service providers with the ability to administer most aspects of the program directly themselves. The “braiding” of public funds and private and corporate philanthropy will be key to achieving all of the above.

While all of these best practices are important, one theme should be elevated over all others: **every aspect of any rental assistance program should be designed to “invert the burden.”** Inverting the burden refers to removing, to the maximum extent possible, all the work that typically falls on the shoulders of families in crisis. Specifically, it means removing as many of the barriers to access as we can, whether that means flexible and realistic documentation requirements, providing application assistance, or user-friendly processes that build trust, not resentment, in a time of need.

What follows are central themes and key areas for reform. This represents the collective work of the Prioritizing Communities Working Group, and in particular, the lessons learned by both the providers who administer rental assistance to the Atlanta community and the residents, as represented by groups such as the Parent Avengers, who have to navigate the systems that have been created. More specific recommendations and greater detail can be found following this summary.

Addressing Provider Capacity

Successful programs must pay attention to capacity issues among the provider ecosystem. To do this work effectively, especially when residents are in a crisis, is labor intensive.

Flexible and Adequate Levels of Funding

Through braiding government funding with private and corporate philanthropy, programs can better address coverage gaps and build more flexible systems with eased eligibility and documentation requirements.

Improved Outreach and Communication with Public and Applicants

Overall, there must be a strong emphasis on - and resources committed to - outreach and public information campaigns to make sure communities and neighborhoods actually get necessary information. Programs should think outside the box to reach more of those in need. Communication with the public and applicants should be consistent and set clear expectations up-front for eligibility, documentation requirements, processing time, and how to request help. Moreover, programs should

make every effort to limit the mid-program changes to eligibility, process, application, and documentation requirements that confuse and frustrate applicants.

Improved Program Design, Access, and Application Process

Program design should involve input from a wide range of stakeholders as early in the design process as possible, particularly resident-applicants who are experiencing the greatest challenges and vulnerabilities. Providers are also essential stakeholders, but a broader group including landlords, eviction courts, and others are critical as well. In designing paths for access, there needs to be *both* a single point of access and application *and* the ability for residents to access services directly from a network of trusted, community-based, local providers empowered to directly handle the high volume and able to initiate and complete the process without the return to the centralized application process.

Simplifying the Application Itself and Easing Documentation Requirements

In general, the sheer volume of documentation required can overwhelm and lead to disqualification of otherwise eligible applications. While already living in crisis, the burden of securing, organizing, and submitting documentation can overwhelm applicants and create opportunities for errors. Moreover, requiring a high volume of documentation burdens providers who must contact applicants, often repeatedly, for missing or unacceptable documentation. Finally, in addition to addressing the sheer volume, allowing flexibility around the specific form of documentation accepted would reduce the disqualification of otherwise eligible applicants.

Easing Specific Eligibility Requirements

Every effort should be made to reduce excessive eligibility requirements and required documented proof. Programs should not add additional requirements to client eligibility beyond that outlined in federal guidelines, and non-governmental dollars should be used to address eligibility gaps.

Reducing the Burden on Providers – Data Entry, Reporting, and Monitoring

Every effort should be made to lessen the administrative burden on providers. Successful approaches include customizing and simplifying data entry requirements and eliminating the redundant data entry that hinders providers' ability to efficiently disseminate assistance. Moreover, simplifying or eliminating regular reporting requirements where adequate monitoring can be accomplished through already submitted data can greatly increase efficiency.

Effective Communication and Flexibility from Funders and Compliance Monitors

Providers constantly learn better ways to provide assistance; successful programs are those that can listen, adapt, and allow for creative innovation by providers in terms of outreach and processes. Additionally, while this flexibility is important, it is also critical to set clear programmatic guidelines (e.g., eligibility, compliance standards) before program launch and, to the extent possible, stay the course with respect to those expectations through the duration.

Coordination with Courts and Legal Services

Programs should consider ways to partner with both the court system and legal services providers, as effective ways to promote the availability of assistance, conduct outreach to those most closely at risk of

displacement, and integrate legal services into their program design. The legal advice and counsel provided by legal services providers is critical to ensure that assistance recipients' rights are protected and the rental assistance provided in fact heads off displacement.

Program Evaluation and Metrics of Success

In addition to tracking the amount of funding disbursed by each agency, programs should consider ways to measure and track both provider staff burnout and applicant satisfaction.

Efficient Payment Processing

Programs should encourage and help providers invest in the capacity to make and deliver payments to landlords and utility providers electronically.

DETAILED RECOMMENDATIONS

Addressing Provider Capacity

1. Successful programs must pay attention to capacity issues among the service provider ecosystem for emergency rental assistance. To do this work effectively, especially when residents are in a crisis, is labor intensive. Not only should allowable administrative costs be set, where possible, *at least* 15% of any emergency assistance award, funders should also separately and adequately invest in capacity building among providers. Investment in the provider ecosystem – with an eye towards both general operating expenses and sustainable growth - must happen outside of the context of a crisis if a community is to be prepared during one.
2. During a crisis, funding available for staffing must be adequate for the hiring of new staff to address the escalation in work. Too often, allowable administrative spending is not enough to bring on even temporary staff. Consequently, provider staff have to shift away from other critical programming during a crisis, overall programming suffers, and staff burnout is high.

Flexible and Adequate Levels of Funding

1. There needs to be sustained, ongoing resources for rental assistance to prevent housing instability and homelessness. Moreover, government funding needs to be braided with non-public sources (private and corporate philanthropy) so that we can design more flexible systems than are allowed under government regulations, in terms of eligibility, documentation, and audit standards.
2. In addition to allowing for more flexibility in terms of eased eligibility, documentation, and audit standards, non-public funding should be leveraged to address other gaps, whether geographic or related to the type of expenses covered.

Improved Outreach and Communication with Public and Applicants

1. Overall, there must be a strong emphasis on - and resources committed to - outreach and public information campaigns to make sure communities and neighborhoods actually get necessary information about programs. Thorough community engagement plans are a key factor in successful programs.

2. Programs should think outside the box to promote the program and reach more of those in need. For example, programs could utilize interstate billboards, the municipalities' text update systems, amber alerts, social media, and mail-outs. In using communication pathways, however, programs must pay attention to issues of equity, thoughtfully considering which groups would be disproportionately unlikely to engage in the chosen mediums.
3. Where programs utilize a centralized application option and a network of providers, clients need clear and accurate information about to which provider they have been assigned and how to obtain updates about the status of their application.
4. Programs should pay close attention to setting clear expectations when communicating with applicants. Unclear expectations about when applicants would receive follow-up calls or how long applications will take to be processed, for example, can create frustration and generate unnecessary work in the form of providers having to repeatedly respond to applicant inquiries.
5. Applicants should be informed that providers may request additional documentation after initial submission of the application. This will help set expectations and maintain applicant's trust of participating providers.
6. Programs should make every effort to limit mid-program changes to eligibility, process, application, and documentation requirements, so that providers do not have to repeatedly communicate changes. In past programs, providers spent an excessive amount of time placing and answering phone calls and emails explaining changes to applicants.
7. Where program changes are unavoidable and where there is a centralized coordinating entity, communication of such changes should be made to all applicants by the centralized coordinating entity so that individual providers can focus on processing applications. For example, applicants could be informed of changes to paperwork requirements, deadlines, and availability of funding, through a periodic "newsletter" with updates and FAQs.
8. Common disqualifying criteria should be prominently displayed on the application and otherwise conveyed to the general public and applicants. One specific area where clear communication is important is around geographic eligibility; boundaries of eligibility can often be confusing when applicants understandably have varying understandings of in what jurisdiction they live. Relatedly, where reliable information is available, application websites should include eligibility and application information for assistance programs in neighboring and regional jurisdictions. Where feasible, regions should consider supporting websites with information about, and links to, on-line applications for all regional assistance programs.

Improved Program Design, Access, and Application Process

1. Program design should involve input from a wide range of stakeholders as early in the design process as possible, particularly resident-applicants who are experiencing the greatest challenges

and vulnerabilities. Providers are also essential stakeholders, but a broader group including landlords, eviction courts, and others are critical as well.

2. While multiple community-based access points are critical, there needs to be a centralized, real-time tracking of the spending and allocation balances across the network so that smart referrals can be made and the burden of identifying the appropriate provider is not shouldered by applicants.
3. There needs to be *both* a single point of access with a single application *and* the ability for residents to access services directly from a network of trusted, community-based, local providers. The local providers need to be empowered to directly handle the high application volume and empowered to initiate and complete the process without the return to centralized administration of funds. Much of the inefficiency in previous efforts stemmed from providers not being able to process applicants directly. As long as providers continue to enter data into a centralized system, programs can ensure centralized tracking of recipients and of providers' spending levels and allocation balances, while distributing funds significantly faster without sacrificing fraud prevention.
4. If a centralized application allows applicants to select a preferred provider, every effort must be made to honor that selection and quickly connect the applicant with their chosen provider. In previous efforts, some applicants were not directed back to the same providers who invested resources to outreach the clients and assist them in completing the application. This failure created confusion for clients, was inefficient, and skewed the balance and distribution of workloads and assistance distributed between various providers.
5. "Recertification" - i.e., approving previously approved recipients for additional months of assistance – should be conducted efficiently through use of a simplified portal that clients use to request recertification funds. Such a system could allow clients to upload all required forms (e.g., recertification forms, landlord verifications) at one time, allowing providers to see all clients requesting recertification, the amount requested, and obtain all needed documents in real time. Manually facilitating recertification through outreach to clients by phone and email is inefficient and significantly slows the processing of recertification *and* new applicants.
6. Every effort should be made have a streamlined process for the submission of documentation. Requiring providers to download documentation from a centralized application platform, collect additional documentation from applicants, and upload all documentation back into multiple platforms – sometimes at multiple times – can create considerable inefficiency and limited the numbers that could be served.

Simplifying the Application Itself and Easing Documentation Requirements

1. Every effort should be made to simplify on-line applications. Providers heard many accounts of applicants simply giving up when they saw all the required fields and documentation requirements, without knowing that they could save their application progress and obtain help completing the rest of the application. In addition to simplifying the application, effective completion of the application could be improved by integrating prompts for requesting application help, better previews or

warnings of all the documentation an applicant will need, and clear reminders of the ability to save and return to an application.

2. Landlord “Rent Verification Forms” and other documentation requirements that are totally dependent on the cooperation and participation of landlords can lead to disqualification of otherwise eligible applicants where landlords are skeptical or otherwise not willing to assist tenants, particularly where such requirements are redundant. For example, rent verification forms have been required *in addition to* other proof of rent arrears.
3. Submission of copies of social security cards should not be required. Providing the last four digits of social security cards should be sufficient.
4. In addition to addressing the sheer volume, allowing flexibility around the specific form of documentation accepted would reduce the disqualification of otherwise eligible applicants. Looking at each applicant on a case-by-case basis and using professional judgement, the following are areas where alternative forms of reliable documentation exist and should be accepted:
 - a. For proof of rent obligation and arrears, reliable forms of proof include rent ledgers, “balance due” statements, late notices, eviction notices, and emails from landlords. Where verification is needed, providers can verify property ownership through county tax assessors’ websites and obtain addition verification through property managers directly. Insisting that landlords fill out separate rent verification forms, however, creates a barrier to getting assistance to those in need.
 - b. With respect to proof of income before COVID-19 or loss of income due to COVID-19, bank statements can be difficult for many applicants to obtain. Reliable alternative proof may include separation notices, unemployment statements, emails from employers, offer letters that state “unable to start due to COVID-19 shutdown,” and “work excuse due to health issues” notes from medical professionals.
 - c. For proof of residence, it is common for applicants not to be listed on the lease due to intimate partner abuse, prior evictions, low credit scores, or criminal history. Moreover, many low-income tenants simply have no lease. This is known as being a “tenant at will,” a form of tenancy that is no less valid under the law. In these situations, programs should accept as proof of residence voter registration cards, current utility bills in the applicants’ name, driver’s licenses, or state-issued identification cards, current bank statements, or current vehicle registrations.
 - d. With respect to documentation related to utility assistance requests, there are legitimate reasons why the lease may be in one occupant’s name while the utility account is in another occupant’s name. Programs should be flexible in this situation, as the utility assistance would still be guaranteed to go to the utilities at the applicant’s eligible household. Additionally, where applicable, providers can use the utility company’s portal to verify balances due, pre-paid accounts with negative balance or zero balance, and to make payments.
5. Where an on-line application is utilized, every effort should be made to screen out applicants and inform them of the same before allowing the application to proceed – e.g., out-of-area zip codes,

income levels. Similarly, common disqualifying criteria should be prominently displayed on the application and otherwise conveyed to the general public and applicants.

Easing Specific Eligibility Requirements

1. Every effort should be made to reduce excessive eligibility requirements and required documented proof. Examples of previously contemplated or implemented requirements that should be avoided include but are not limited to:
 - a. Any requirements of a history of timely rental payments or rental “good standing:” In addition to disqualifying otherwise eligible applicants who do not have a history of timely payments due to income volatility, timing of their paychecks, or other hardships, many applicants who *do* have a “clean” history would be disqualified due to the common inability to provide proof thereof.
 - b. Any requirements to fall below an income standard *prior to* the qualifying COVID-19-related hardship: Such rules disqualify many tenants in desperate need, despite clients being currently unemployed, again including otherwise eligible lower-income tenants who simply cannot meet the “burden of proof” of proving pre-COVID wages.
 - c. Requiring social security numbers, date-of-birth, and other data for all household members can significantly slow down the processing of applications. Where enabling regulations allow, such requirements should be eased to allow for efficient processing.
2. Eligibility for residents of subsidized housing should be considered. It is a misconception that most or all Section 8 recipients, for example, have very small or no rent obligation themselves. In fact, many voucher holders have relatively significant rent obligations and the recalculation of their rent obligations due to a loss of income can be delayed. With respect to utility assistance, under some lease agreements and subsidized programs, the utilities must stay on or residents will be in default and at risk of eviction. Covering utility balances – which are increasing significantly as families and children are quarantine – can therefore be a cost effective way to prevent evictions.

Reducing the Burden on Providers – Data Entry, Reporting, and Monitoring

1. Programs should limit the documentation that providers are required to provide to applicants. When applicants are rejected, a simple denial letter or email should suffice.
2. Programs should avoid redundant “summarizing” forms and calculations that place undue burdens on providers. For example, requiring providers to complete income calculation forms *in addition to* collecting verifying documentation is a significant burden to providers that slows the process substantially.
3. While a centralized data tracking system is critical, programs should be diligent in customizing and simplifying data entry requirements that can significantly burden providers. Unnecessary fields significantly lengthen the data entry process. Similarly, programs should avoid requiring redundant data entry by providers. In the past, redundancy has significantly hindered providers’ ability to efficiently disseminate assistance.

4. Programs should be diligent in simplifying or eliminating reporting requirements, especially when adequate monitoring can be accomplished by retrieving data whose entry is already required. Where entry into a centralized data tracking system is required, weekly or monthly reporting should be unnecessary. By eliminating reporting requirements, provider agencies can spend more time serving households. If reporting requirements are absolutely necessary, the intervals for reporting should be realistic – e.g., weekly reporting may be overly burdensome – and the means of submission should be simplified.
5. Programs should ensure that compliance monitoring and any audits are conducted in a manner that does not unduly burden providers nor interfere with the ongoing dissemination of assistance. Compliance monitoring should begin early and be on-going on a relatively frequent if not rolling basis so that providers are not paralyzed by high-volume corrective action requests submitted all at once. To the extent possible, all compliance monitoring and auditing should be performed by auditors' reference to already submitted data and documentation. Providers should never have to resubmit already submitted documentation or provider data which is otherwise available in the system.
6. When seeking recipient success stories or other “customer satisfaction data,” jurisdictions or their program managers should consider contacting recipients themselves or otherwise automating the process for obtaining such feedback. In the middle of a pandemic, requiring providers to stop assisting applicants in order to obtain this information is inefficient.

Effective Communication and Flexibility from Funders and Compliance Monitors

1. At every stage, leadership, whether it be municipalities or other funders, need to be able to listen and adapt. Providers will always be learning better ways to provide this assistance; successful programs are those that can listen and adapt.
2. While flexibility is important, it is also critical that every effort be made to set clear programmatic guidelines (eligibility, process, compliance standards) before program launch and, to the extent possible, stay the course with respect to those expectations through the duration. Frequent changes and communications can create significant inefficiencies and confusion and frustration among both providers and residents. Successful programs set the rules and expectations and stuck to them.
3. When programs have both a centralized coordinating entity and a network of providers, communication issues can arise when applicant are unsure of who to contact for information and status updates. In addition to confusing the applicants, this creates programmatic inefficiencies as well, as providers are both communicating directly with applicants and responding to the centralized entity's similar inquiries on behalf of applicants. Programs should strive to have a single point of contact for applicants and making the provider agencies, who are “closer to the work,” that single point of contact likely would be the most efficient.

Coordination with Courts and Legal Services

1. Programs should consider ways to partner with both the court system and legal services providers, as effective ways to promote the availability of assistance and conduct outreach to those most

closely at risk of displacement. Courts and legal services providers could be partners for the administration of the assistance program.

2. Programs should further consider integrating legal services into their program design. The legal advice and counsel provided by legal services providers is critical to ensure that assistance recipients' rights are protected and the rental assistance provided in fact heads off displacement. For example, the advice provided by a courthouse-based tenants' rights center could ensure that a tenant successfully respond to an eviction filing and properly present the evidence of the rental assistance having been paid.
3. Programs should consider collaboration with courts and legal services providers to institute procedures and requirements that will help ensure the provision of rental assistance actually results in stopping displacement. For example, courts could be involved in the provision of assistance that aids both tenants and the recipient-landlords, and could require that, as a precondition to receiving assistance, the tenants and the landlord must agree to the following:
 - a. Dismissal of the dispossessory within 3-days of receipt of rental assistance. Each party forever releases any and all claims that could have been brought against the other.
 - b. A landlord is barred from bringing a new action on the basis of nonpayment of rent for 60-days unless the landlord first provides the tenant a 7-day written notice to cure. Any other action with the exception of a serious lease violation is prohibited for 60 days.
 - c. Landlord will not refer or assign any debt to a debt collector, will not report negative rental payment history, and will cooperate to remove any inaccurate or incomplete item that appears.
 - d. Receipt of any amount of rental assistance takes a tenant's balance to \$0.00. All past due rent is therefore forgiven in the event a landlord receives rental assistance that is less than the balance owed.
 - e. Once the parties' request for rental assistance is approved, the landlord must file a "Notice to the Court of Plaintiff's Participation in Fulton's Rental Assistance Program and Intent to Dismiss." That way, the court is on notice that the landlord likely received rental assistance, and it staves off a landlord from applying for rental assistance, quickly applying for a writ, and then receiving the funds after a writ issues. There will, after all, be lag between the time parties are approved for assistance and when it arrives in the mail.

Program Evaluation and Metrics of Success

1. In addition to tracking the amount of funding disbursed by each agency, programs should consider ways to measure and track both provider's staff work burden/burnout and applicant/recipient satisfaction. Surveys could be automatically sent to both rejected applicants and ultimate recipients, quantitatively evaluating their experience and providing space for qualitative feedback. Similarly, provider staff could be periodically surveyed for feedback on the process and for their self-assessment on their work burden related to emergency assistance.

Efficient Payment Processing

1. Programs should encourage and help providers invest in the capacity to make and deliver payments to landlords electronically. There are several easy-to-use platforms, many that can be integrated with Quickbooks, which allow for electronic payment using only a payee's email. This method saves time and money.
2. Programs should encourage and help facilitate providers access to on-line payment portal relationships with public utilities. Georgia Power, for example, allows provider agencies to establish their own on-line payment portal account through which they can be a third-party payer on others' accounts. Establishing such an account can significantly increase efficiency.