



ATTORNEYS AT LAW

Company Counsel LLC
Two Bala Plaza, Suite 300
Bala Cynwyd, PA 19004
484.325.5660 (office)
484.325.5651 (fax)
bboyle@companycounsel.law

December 16, 2025

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

**Re: Application to Begin Service (Motor Common Carrier of Persons in
Paratransit Service) A-2025-3058891;**

To Whom It May Concern:

This firm represents Carefully Caring Home Care Agency LLC in connection with its submitted application to begin service. Please see the attached document containing information requested via the "Request for Information" dated December 5, 2025.

Please contact me with any questions. Thank you.

Sincerely,

Brian T. Boyle, Esq.

Additional Information for Paratransit Service Application

Question #10 - Carefully Caring Home Care Agency LLC (“CCHC”) is seeking authority from the Pennsylvania Public Utility Commission to operate as a motor carrier of persons in paratransit service and non-emergency medical transportation (NEMT) between points in Pennsylvania originating from the following counties:

- Philadelphia County
- Montgomery County
- Bucks County
- Berks County
- Delaware County

Question #5. **Driver Information-** initially, the Company intends to hire 4 drivers based upon initial demand, but will hire more to support needs as they change.

- a. All drivers must be licensed to operate a vehicle in PA and pass criminal background check and license check requirements. Drivers will be at least 18 years of age (as verified prior to employment) and authorized to work in the United States. Drivers will also be required to acknowledge and agree to an Employee Handbook and sign the Company’s Vehicle Safety and Maintenance Program, which will set forth additional minimum safety standards and expectations for drivers. Any Driver hired under the age of 18 shall be registered as a certified emergency medical services vehicle operator (EMSVO) with the Department of Health. The person shall carry the Department-issued registration of their EMSVO certification on board while operating a paratransit vehicle under 28 Pa. Code §1023.21(h). The company shall verify that the driver is in good standing with the Department and maintain records for 4 years to prove each driver’s EMSVO certificate registration. The Company shall notify the Commission’s Bureau of Technical Utility Services within 3 calendar days of the occurrence of the following events involving a paratransit driver who is under 21 years of age of any accident, driving-related violation such as a moving violation, reckless driving, or driving under the influence of alcohol or drugs.
- b. In order to be hired, drivers will initially be required to pass a criminal background, motor vehicle report check, pre-employment drug screen, and license check, which will require them to be free from major traffic violations for at least 3 years prior to employment. Pennsylvania State Police criminal background check, Child Abuse History Clearance, and FBI fingerprint-based background check when required by law or contract. The Company will not employ or contract with a driver whose criminal history includes offenses that pose a risk to vulnerable passengers, including but not limited to: crimes of violence, sexual offenses, abuse, neglect, or exploitation, drug trafficking or DUI-related felony offenses. Additionally, drivers will be required to acknowledge and agree to an Employee Handbook, which will require them to provide any updates to the company regarding any changes to criminal activity, license status, etc. Copies of the criminal history record will be kept on file by the Company for the duration of the drivers’ work with the Company and made available to PUC upon request.

- c. Drivers will receive training both directly from the Company and through third party driver safety companies regarding job expectations, safety, applicable Pennsylvania driving laws, and more. Drivers will also receive training documents and an Employee Handbook, which they will be required to read and sign. This will include appearance requirements, such as being neatly attired in professional clothing, displaying professional behavior at all times, refraining from inappropriate language or conduct, assisting passengers with luggage and doors (unless declined), only engaging in authorized pickups, and emergency care for passengers. Drivers will also be trained on operating vehicles safely and in compliance with traffic laws, following designated routes, refraining from using mobile phones or other electronic devices while driving (except hands-free), refraining from smoking, and keeping the vehicle clean, safe, and in good repair.
- d. In order to be hired, drivers will initially be required to pass a criminal background, motor vehicle report check, pre-employment drug screen, and license check, which will require them to be free from major traffic violations for at least 3 years prior to employment. Additionally, drivers will be required to acknowledge and agree to an Employee Handbook, which will require them to provide any updates to the company regarding any changes to criminal activity, license status, etc. Copies of the criminal history record will be kept on file by the Company for the duration of the drivers' work with the Company and made available to PUC upon request.
- e. The Company has a clear policy against drug and alcohol use while driving, and against operating a vehicle under the influence of drugs, alcohol, or any controlled substance. Drivers will be made aware of this policy and will be required to sign a policy stating such. Drivers must complete and pass a pre-employment drug screen as well, and consent to random drug and alcohol screening.

2. The Company has operated since 2019 as a community-based home care and support agency serving adults with disabilities, seniors, and individuals receiving Medicaid home- and community-based services. The company has established infrastructure in staffing, scheduling, compliance, billing, and risk management that will support safe and reliable passenger transportation.

The Company proposes to:

- Transport existing clients who require assistance, supervision, or specialized support due to physical, cognitive, intellectual, or behavioral needs.
- Provide **non-emergency medical transportation** to existing clients to and from medical appointments, dialysis, hospital discharges, therapy, and other medically necessary services.
- Coordinate trips in collaboration with waiver Support Coordinators, Service Coordinators, hospitals, clinics, and community agencies.

Additional Information:

The Company leadership has over 18 years of combined experience in human services, home care, and operational management, including managing staff schedules, shift coverage, and time-sensitive services. The agency currently serves Medicaid waiver participants and has experience working with state and managed care requirements around safety, documentation, and quality assurance.

The Company's Vehicle Safety & Maintenance Plan ensures that all company-operated vehicles are safe, properly equipped, and maintained per manufacturer recommendations and PUC requirements. The Company will operate standard sedans/minivans for ambulatory passengers and wheelchair-accessible vans for passengers using mobility devices when available. Preventive maintenance includes daily pre-trip inspections by drivers—checking brakes, lights, horn, wipers, mirrors, tires, leaks, seatbelts, wheelchair lifts, and interior hazards, with completion of a Daily Vehicle Inspection Form—and routine maintenance by approved mechanics, including oil changes, filters, and fluids every 5,000 miles, brake and suspension checks every six months or 10,000 miles, and annual state safety inspections. Any defects found are documented, reported to the Transportation Supervisor, and corrected before the vehicle returns to service if safety-related. Maintenance logs, inspection records, and repair invoices will be retained for at least three years, identifying vehicle details, service type, date, odometer reading, and repair facility.

The Operating Plan of the Company includes centralized dispatch and scheduling using software or logs, with routes assigned daily based on passenger needs, geography, and appointment times, and real-time changes managed by a dispatcher. Standard operating hours are 6:00 AM to 8:00 PM, Monday through Saturday, with additional hours on an as-needed basis. The Transportation Supervisor oversees driver hiring, training, vehicle assignments, and incident reviews, while drivers adhere to CCHC policies. Passenger safety requires mandatory seatbelt use, securement of wheelchairs with approved tie-downs, and no passengers left unattended; incident reports are completed for injuries, collisions, behavioral events, and breakdowns. Each trip is documented with date, time, origin, destination, passenger ID, driver name, and mileage for billing. Billing will be made to existing accounts on file with the company in accordance with the client's current billing schedules. The Proposed Tariff applies to paratransit and non-emergency medical transportation within specified Pennsylvania counties and includes base rates for ambulatory and wheelchair trips, additional mileage charges, wait-time fees, optional after-hours/weekend surcharges, and no-show fees.

I, Rolanda Robinson, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

CAREFULLY CARING HOME
CARE AGENCY LLC

Rolanda Robinson

By: Rolanda Robinson, Owner/CEO