

DATE OF DEPOSIT

Docket No. A-2026-3061340
Hands to Hands LLC

APR 06 2026

Request for Information

PA Public Utility Commission
Secretary's Bureau

- 1.) There are conflicting territory descriptions throughout the application. Please clarify the proposed territory and service. (The PUC is specifically interested in the counties from which operations will originate). To be clear, the request should be to provide transportation from those specific counties to points in Pennsylvania, and return, to allow you access to other counties. You will need to comprehensibly show how you will be able to provide service to the wide range of territories. As such, show that you have the infrastructure and resources in place for your specific territory. Review the attached list of examples of passenger carrier territories on the last pages of the data request for guidance.

Note: Territory can be added in the future when additional resources become available.

- 2.) Question # 5 of the Verified Statement.

Please review the requirements of the following chapters of 52 Pa Code at

www.pacode.com and provide a required plan for drivers that fully demonstrates

compliance with the below cited statutes in case of expansion. This is not optional.

- A.) § 29.504. Driver's license checks. Explain the schedule? How will you make sure they are done on a set schedule?

See attached

PARATRANSIT CARRIER TERRITORY EXAMPLES AND EXPLANATIONS:

The Public Utility Commission is specifically concerned with the location in which trips by your company will ORIGINATE. Your requested territory must have boundaries and are typically requested by County / Counties.

Take care in choosing the correct language. You must file a new application and pay an additional fee to amend any approved territory.

Examples below:

1) To transport persons, by motor vehicle, in Paratransit service, from points in (County name/names here), to points in Pennsylvania, and return.

Note: This territory means that you are not limited to a vehicle type, not limited to the type of activity regarding non-emergency medical transportation, or transportation for virtually any reason. This language would give your company the broadest customer base to work from.

2) To transport persons, by motor vehicles, in Paratransit service, in wheelchair vans, between points in (County name/names here).

Note: This territory means that you must:

- a) provide all services in wheelchair vans, and
- b) could travel only between points within the county or counties requested as your territory. You could not leave those counties and return.

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Secretary's Bureau**

Docket No. A-2026-3061340
Hands To Hands LLC

Response to requested information

April 2, 2026

1. Hands To Hands, LLC requests authority to provide transportation of persons by paratransit service from points in Lancaster, York, Dauphin, and Chester Counties to points in Pennsylvania, and return. Service to other counties within Pennsylvania, including but not limited to Philadelphia County and Montgomery County.

Transportation services will be conducted as follows:

- Trips will originate in one of the designated origin counties, or
- Be part of a return trip to one of those counties

This structure allows Hands To Hands, LLC to transport passengers to destinations across Pennsylvania (including medical facilities, residences, and other service locations) while maintaining compliance with PUC territorial requirements.

Hands To Hands, LLC can serve a broad range of destinations throughout Pennsylvania due to the following operational resources:

Multi-County Vehicle Deployment

- Vehicles will be strategically stationed across all four origin counties
- This reduces response times and supports regional coverage

Centralized Dispatch System

- A centralized dispatch operation will:
 - Coordinate trip scheduling
 - Optimize routing across counties
 - Manage both local and long-distance trips

Driver Allocation and Scheduling

- Drivers will be assigned to specific geographic zones within origin counties
- Scheduling will support:
 - Same-day trips
 - Pre-scheduled medical transport
 - Long-distance transportation needs

Fleet Capacity

- Initial fleet includes:

- Wheelchair-accessible vans
- Standard passenger vehicles
- Fleet will be expanded as demand increases

Communication Systems

- Drivers will maintain real-time communication with dispatch
- Mobile technology will allow route adjustments and efficient trip coordination

Maintenance and Reliability

- Vehicles will undergo:
 - Daily inspections
 - Preventive maintenance
- Ensuring reliability for both short and long-distance trips

Infrastructure Supporting the Territory

Hands To Hands, LLC has established sufficient infrastructure to support its proposed service area, including:

- Dispatch and scheduling systems
- Driver staffing across origin counties
- Vehicle allocation and maintenance systems
- Administrative oversight and compliance tracking

Scalability and Expansion

As demand increases, Hands To Hands, LLC will:

- Increase fleet size
- Hire additional drivers
- Enhance dispatch capabilities
- Strengthen operational presence within origin counties

This ensures continued ability to provide safe, reliable, and efficient service across the authorized territory.

2. Question #5 of the Verified Statement

A.) Initial Driver License Check (Pre-Employment)

Before any driver is permitted to operate:

A Motor Vehicle Record (MVR) will be obtained from:

- Pennsylvania Department of Transportation (PennDOT)
- Any other state where the driver held a license in the past 3 years

The MVR will be reviewed to confirm:

- Valid license status
- Acceptable driving record
- No disqualifying violations
- No driver will be authorized to operate until this process is completed.

Ongoing Driver License Check Schedule (Required Frequency)

Hands To Hands, LLC will conduct driver history checks as follows:

Minimum Compliance Standard (PUC Requirement)

- At least once every 12 months per driver (required by § 29.504)

Enhanced Company Standard (Stronger Compliance)

- Annual MVR check (mandatory)
- Quarterly internal license status verification (validity check only)

This ensures:

- Full legal compliance
- Additional safety monitoring between formal checks

System to Ensure Checks Are Done on a Set Schedule

To guarantee strict adherence to the required schedule, Hands To Hands, LLC will implement the following structured system:

Centralized Driver Compliance Register

A digital tracking system/database will be maintained containing:

- Driver name and hire date
- Date of last MVR check
- Next required MVR check (auto-calculated at 12 months)
- License expiration date

Automated Scheduling & Alerts

The company will use calendar-based compliance software to enforce deadlines:

- Automatic reminders at:
 - 60 days before due date
 - 30 days before
 - 7 days before

- Due date
- Escalation alerts if overdue

This creates a fixed, non-negotiable schedule system.

Designated Compliance Officer

A Compliance/Safety Manager will be assigned responsibility to:

- Order all MVR reports
- Review and approve driver eligibility
- Track completion status
- Ensure no lapses occur

Accountability ensures execution.

Monthly Internal Audits

- A monthly audit of all driver files will be conducted
- Any upcoming or overdue checks will be immediately flagged and corrected

System Controls (Fail-Safe)

- Drivers approaching expiration or overdue checks will be:
 - Automatically removed from dispatch eligibility
- Dispatch system will only assign trips to compliant drivers

Continuous Monitoring Between Scheduled Checks

In addition to the annual requirement:

- Drivers must immediately report:
 - Citations
 - Suspensions
 - License restrictions
- Additional MVR checks will be conducted:
 - After any accident
 - Upon complaint
 - At management discretion

Recordkeeping

Hands To Hands, LLC will:

- Maintain all MVR reports for at least 2 years in compliance with § 29.504
- Store records securely (digital and/or physical files)
- Ensure availability for inspection by the Pennsylvania Public Utility Commission

Expansion Plan (Scalability)

As the company expands:

- The same 12-month mandatory MVR cycle will apply to all drivers
- The compliance system will scale by:
 - Expanding the digital tracking system
 - Adding compliance personnel
 - Utilizing third-party MVR monitoring services if needed
- This ensures consistent compliance regardless of fleet size.

Enforcement Policy

Any driver who:

- Fails to maintain a valid license
- Exceeds acceptable violation thresholds
- Misses required compliance checks

Will be:

- Immediately removed from service
- Subject to review and possible termination

B.) Pre-Employment Criminal History Check

Before any driver is permitted to operate:

- A Pennsylvania State Police criminal history check will be completed via ePATCH. The Pennsylvania State Police provide an online portal called ePATCH for individuals to request a criminal history check.
- A national background screening will be conducted where available
- Identity verification will be performed
- No driver will be authorized to operate until the background check is completed and reviewed.

Ongoing Criminal History Check Schedule (Frequency)

Hands To Hands, LLC will implement the following schedule:

Minimum Compliance Standard

- Criminal history background checks every 12 months (annually) for all drivers

Enhanced Company Standard

- Annual full background check (mandatory)
- Additional checks triggered by incidents or reports

This ensures continuous monitoring and compliance with regulatory expectations.

System to Ensure Checks Are Done on a Set Schedule

To guarantee that criminal history checks are completed on a fixed and reliable schedule, Hands To Hands, LLC will implement the following controls:

Centralized Compliance Tracking System

A digital driver compliance database will be maintained, tracking:

- Driver name and hire date
- Date of last criminal background check
- Next scheduled background check (auto-calculated annually)

This ensures all drivers are monitored consistently.

Automated Reminder and Scheduling System

Hands To Hands, LLC will utilize calendar-based compliance tools to enforce deadlines:

- Automated alerts at:
 - 60 days prior
 - 30 days prior
 - 7 days prior
 - Due date
- Escalation alerts if overdue

This guarantees adherence to a fixed annual schedule.

Designated Compliance Officer

A Compliance/Safety Manager will be responsible for:

- Initiating all background checks
- Reviewing results
- Maintaining documentation
- Ensuring all deadlines are met

Monthly Internal Audits

- Monthly review of all driver compliance records
- Immediate correction of any overdue or upcoming checks

System Enforcement Controls

- Drivers with overdue background checks will be:
 - Removed from dispatch eligibility until compliance is completed
- Dispatch system will only assign trips to fully compliant drivers

Continuous Monitoring Between Scheduled Checks

In addition to annual checks:

Drivers are required to immediately report:

- Arrests
- Criminal charges
- Convictions

Additional background checks will be conducted:

- After any reported incident
- Upon receipt of complaints
- At management discretion

Recordkeeping

Hands To Hands, LLC will:

- Maintain criminal history records securely
- Keep records current and organized
- Make records available for inspection by the Pennsylvania Public Utility Commission

Expansion and Scalability

As the company expands:

- The annual background check requirement will apply to all drivers
- The compliance system will scale by:
 - Expanding the tracking database
 - Adding compliance personnel
 - Utilizing third-party screening services

This ensures consistent compliance regardless of fleet size.

Enforcement Policy

Any driver found to have:

- Disqualifying criminal history
- Failure to report required information
- Missed compliance deadlines

Will be:

- Immediately removed from service
- Subject to disciplinary action, up to termination

Statement of Financial Position (Balance Sheet)

As of (date) 3/10/2026

(Must be less than 6 months old)

ASSETS

Current Assets		
Cash	\$5,000	
Other Current Assets (specify)	\$ 2,000.00	
Total Current Assets		<u>\$7,000.00</u>
Tangible Assets		
Motor Vehicle Equipment		
Property (buildings, land, etc.)	0.00	
Office Equipment		<u>1,000.00</u>
TOTAL ASSETS		<u>8,000.00</u>

LIABILITIES

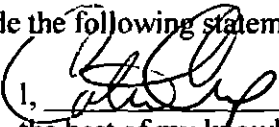
Current Liabilities (Due within one year of date)		
Loans	\$0	
Credit cards/revolving credit	\$1,000.00	
Other Liabilities (Attach schedule)	\$0.00	
Total Current Liabilities		<u>\$1,000.00</u>
Long Term Liabilities (Due after one year of date)		
Mortgage	\$0.00	
Long term commercial loan	\$0.00	
Other Liabilities (Attach Schedule)	\$0.00	
Total Long-Term Liabilities		<u>\$0.00</u>
TOTAL LIABILITIES		<u>\$1,000.00</u>

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Secretary's Bureau**

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:


I, , hereby state that the facts 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).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

Failure to comply with this request within 10 working days from the date of this letter will result in the denial of the application.

Please direct any questions to Compliance Specialist Kevin Morgan, Bureau of Technical Utility Services at (717) 787-2687. Faxed or emailed filings are **not** accepted.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure

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Secretary - Bureau

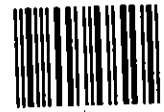
Works To Hands
173 Embassy Dr
Lancaster, PA 17603

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Matthew L. Homsher, Secretary
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