



DC Coalition on Long Term Care

February 8, 2023

Councilmember Charles Allen
Chair, Committee on Transportation and the Environment

Councilmember Anita Bonds
Chair, Committee on Executive Administration and Labor

Councilmember Christina Henderson
Chair, Committee on Health

Dear Chairpersons Allen, Bonds and Henderson:

On behalf of the DC Coalition on Long Term Care, this letter requests your attention to address significant issues related to the ParkDC parking permit system, specifically as it relates to home health aides.

As you are aware, DC is experiencing a critical shortage of home health aides. One problem that exacerbates this shortage is the inability of home care aides to park safely in residential neighborhoods during their shifts without regularly incurring parking tickets that they can ill-afford to pay. (Parking ticket fees and penalties can quickly equal or exceed an aide's daily take-home pay). Many DC seniors live in areas not easily accessible by public transit, meaning their home care aides must drive and park in their neighborhoods.

To help home care aides overcome this barrier, ParkDC created a special and free system to issue parking permits to home health aides via an online portal, in a similar manner as all visitor parking permits. However, what started as a well-intended idea has resulted in an overly burdensome system that is practically unusable by DC's senior residents and home health aides.

Below is a table outlining, step-by-step, the process that must be followed by the home health aide and the service recipient (almost always a senior) and the issues associated with each step. The process must be repeated for every client, and the permit expires and must be renewed every six months.

1	Home health aide must set up a ParkDC Account and enter their Department of Health certification number to verify that they are a home health aide.	Home health aides have struggled to complete this task on their own.
2	DC Senior or their family member must set up a ParkDC Account, which must be verified via email.	Many seniors do not have email addresses. The senior is required to find a verification email and click a link to verify their account. Social workers and others are assisting seniors to set up these accounts, but it requires the Senior to provide their driver's license number or other valid ID. Some seniors do not have a valid drivers' license or ID. For some seniors that do have a driver's license, this request is invasive/worrying. There's also the fairly common issue of forgotten/lost passwords, getting locked out of and having to reset accounts. This is difficult for seniors to navigate.
3	Senior must go into their account and find the "Home Health Aide Visitor Code"	The code is difficult to find. Seniors likely aren't reading/watching the tutorials ParkDC has set up online
4	Senior must share their code with their Home Health Aide	This is difficult for seniors with limited access to technology, memory/vision problems, etc.
5	Home Health Aide must go into their account and enter the code provided by the senior to create a permit	Home Health Aides must be able to get the code from the senior.
6	Home health aide must select a start date	This interface is confusing because it asks you for a start date. However, there is no indication that the permit expires in six months and that the permit must be renewed.
7	Home Health Aide must enter their vehicle data, including make, model, color, and license plate number. Only one vehicle is allowed per permit	This disadvantages aides who lack reliable transportation or do not own their own car. It is not uncommon for an aide to share one or more cars with family members. If a vehicle breaks down, they may have to borrow a car on short notice. This puts them at risk for additional parking tickets.

8	Home Health Aide must upload a contract with the client.	Home health agencies cannot use their standard service agreement that every client signs. They must create a new contract and get a signature for this specific purpose. This new contract must be signed within 30 days of the date of submission to ParkDC and must be on agency letterhead. Uploading documents is very difficult if the aide is using their phone and not a computer. Aides have limited access to personal computers, printers and scanners.
9	The permit request/contract then must be reviewed and approved by the ParkDC Verification team	The turnaround time is not clearly specified. This process has resulted in delays.
10	The senior then must go back into their account and approve the permit after approval from the ParkDC Verification team.	It is unclear why this step is needed on top of all the other many levels of approval (e.g. Dept. Health License #, verification email when creating account, Code generated by Senior, review/approval by park DC, secondary approval by Senior)
11	Aide must go back into their account to download/print the permit.	Aides have very limited access to personal computers, printers and scanners.
12	Process must be repeated for each Senior that an aide visits as the parking permit is only good for one client at one address.	Most aides serve more than one client. Aides also work PRN (as needed), filling in for someone who has called out or is unavailable. In some cases, multiple aides may be covering multiple shifts for one or more clients. The permits are not transferable or usable in these very common situations.

The multi-step process outline above is a significant burden on the aides, the agencies and on family members. It is challenging even for people with technological skills. For most home health aides and the vulnerable seniors they serve, it is unworkable. The overly complicated process makes it much more challenging and costly for home health agencies and home health aides to do their job and is yet another reason why seniors have difficulty retaining home health aides.

There are many possible avenues to streamline and improve the permitting process. Specifically, we urge DDOT to reengineer the process to:

1. Allow a DC licensed home care or home support agency to request a parking permit and assign it to each aide in their employ. The agency should also be responsible for removing the aide from the list of authorized users when they are no longer employed. If the home health agency had the ParkDC account, it would make things so much easier rather than every single aide needing

an account with different emails/usernames/passwords etc. Each agency would have one account with their own roster of aides who drive.

2. Remove the senior citizen and the family from the process. There is no need to involve the service recipient or their family in the application or approval process. The current process just adds additional unnecessary stress for vulnerable seniors. To the extent that social workers and other helping professionals must get involved, it also adds unnecessary tasks to their workload.
3. Once assigned to an aide, the permit should be valid for any vehicle that the aide uses and at any address to which the aide is assigned for work. To guard against misuse, create a simple mechanism to allow the agency to add each new client/address on the aide's case load to a single permit. The agency also could be set up to print updated permits so they can be displayed in the aide's car windshield.
4. Explore additional technology solutions that would enable parking enforcers to look up the permit numbers to check validity before issuing tickets.
5. Parking permits should be valid for two years and renewals should be aligned with DC Health's licensure/certification renewal cycle.
6. Address concerns about misuse through audits. All aides file timesheets and many are subject to electronic visit verification. Misuse can be addressed through periodic audits of records.
7. Consult with home health and home support agencies, home health aides and organizations that work with seniors before making system changes to ensure that changes are workable for all users.

We look forward to working with your committee staff and the employees at DDOT to fix this broken system. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Claudia Schlosberg".

Claudia Schlosberg
Interim Convenor
DC Long Term Care Coalition

CC: Everett Lott, Director
DC Department of Transportation

Charon Hines
Acting Director, DACL

Katherine Rogers
Director, Long-term Care Administration
Department of Health Care Finance