


CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

Date: March 21, 2018

To: The Honorable City Council
c/o City Clerk, Room 395, City Hall
Attention: Honorable Mike Bonin, Chair, Transportation Committee

From: Seleta J. Reynolds,  General Manager
Department of Transportation

Subject: **COMMUNITY ASSISTANCE PARKING PROGRAM STATUS REPORT (COUNCIL FILE 14-1450-S1)**

SUMMARY

This report is an update to the Los Angeles Department of Transportation (LADOT) Community Assistance Parking Program (CAPP) approved by City Council on February 14, 2017. This report provides an update on the efforts to implement the program, recommendations to adjust the CAPP policy guidelines, and a summary of the effectiveness of the program.

RECOMMENDATIONS

That the City Council, subject to the concurrence by the Mayor:

1. APPROVE the revised "Guidelines for the CAPP" as shown in Attachment II to improve the administrative oversight of the program, streamline the application process for the participant, and ensure that all City policies and regulations are adhered to;
2. ESTABLISH CAPP as a permanent City program and remove the "pilot" designation; and
3. AUTHORIZE LADOT to make technical corrections to the "Guidelines for the CAPP" to effectuate the intent of the Council's actions.

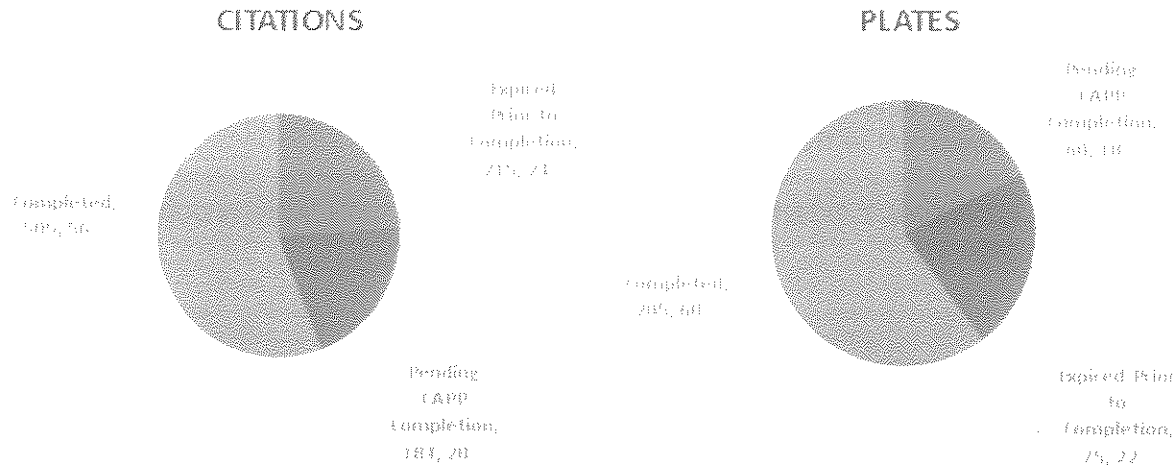
BACKGROUND

In March 2017, LADOT launched CAPP as a pilot program to provide homeless individuals the option to perform community service in lieu of payment of a parking penalty. The inspiration behind the program arose in 2015, when the Mayor's Office proposed a program to help homeless veterans with their parking citations in the City of Los Angeles. The Los Angeles City Attorney's Office also supported the proposal as they administer a Homeless Engagement and Response Team (HEART). Together, LADOT, the Mayor's Office, and the City Attorney's Office collaborated to develop the CAPP proposal into a functioning program to submit to Council for approval. LADOT also engaged various social service agencies, including the Los Angeles Homeless Service Authority (LAHSA), and parking and law enforcement agencies, such as the Los Angeles Police Department's (LAPD) Hope Team, to expand the program. CAPP recently served as a model example in the development of adopted Assembly Bill 503 that created a payment plan option for indigent persons and the process to determine eligibility.

DISCUSSION

Status Update

The CAPP pilot program has been operating for approximately one full year. Through February 28, 2018, people have paid 505 citations totaling \$79,872.50 via community service through CAPP. An additional 184 citations totaling \$25,932.71 were approved for CAPP and are pending community service work. There are a total of 215 citations representing \$33,206 where participants failed to complete CAPP.



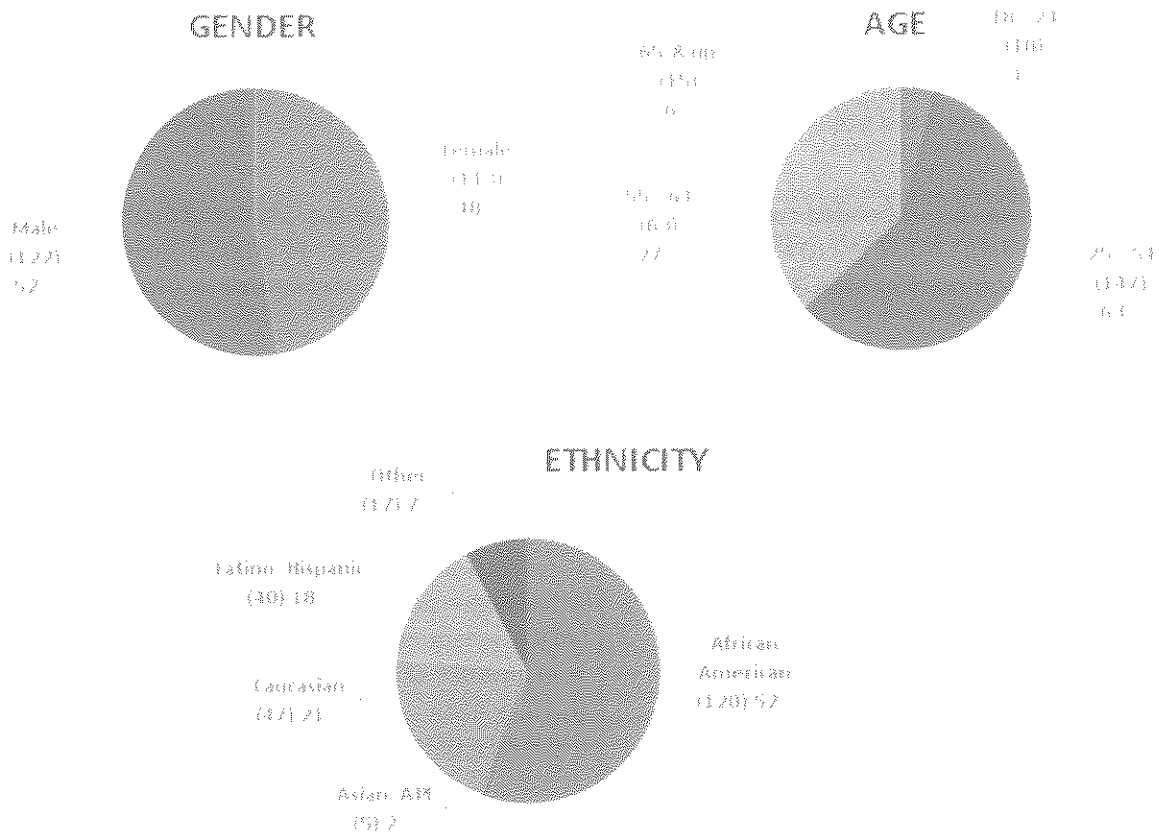
The process to move a participant through the program includes various steps as described in the original CAPP guidelines. A team of four employees support CAPP: one full-time employee and three part-time employees. This team takes phone calls and email requests from interested participants, social service providers who call on behalf of interested participants, and referrals from Conduent State and Local Solutions, Inc. (Conduent), the City’s citation processing agency. In addition to processing requests, the team works with various social service providers to arrange community service work and suspend citations during the community service period. After participants complete their service, the system clears the citations. Failure to complete the program reimposes the citation fines and penalties. Staff works closely with Conduent to ensure that every citation is accounted for and tracked properly.

The CAPP team works diligently to track the type of service and location by requiring service providers to submit a CAPP Completion Form detailing the type of services performed or social services received. Based on a total of 173 CAPP Completion Forms received through February 2018, the list below is the type and frequency of community services performed:

- Administrative Tasks – 41%
- Kitchen Work – 24%
- Janitorial/Housekeeping – 13%
- Job Skills Preparation – 7%
- Labor – 1%
- Counseling – 1%
- Miscellaneous Duties – 13%

Nearly half of all CAPP participants completed community service at the Weingart Center in Downtown Los Angeles. Other commonly used service providers include: Chrysalis, Greater West Hollywood Food Coalition, and Be Fresh Mobile Showers.

As part of the CAPP registration process, participants complete demographic information. The graphs below represents data from the first 10 months of the program:



The CAPP participants are almost equally divided by gender. The age range of the participants is predominantly between 25-54 years of age and the ethnicity is largely African American.

LADOT also administers an exit survey for participants who have completed CAPP to measure their experience. Thus far, participants completed 27 exit surveys. Nearly all surveys showed excellent feedback for professionalism, addressing their service needs, and customer service. Overall, participants measured their experience as "very good." In addition to measuring performance, 74.1% reported they received information on other community services besides parking citations. Nearly all were satisfied with the work they completed for the social service agency and found the environment welcoming. All 27 survey participants indicated they would recommend CAPP to someone else.

Since CAPP is still a pilot program, LADOT has not fully publicized the service through print media or social media, nor fully connected with the Los Angeles County 211 information system. Based upon the results thus far, LADOT recommends that CAPP be a permanent program to allow LADOT to begin robust outreach efforts. With proper outreach, we anticipate a sharp increase in program participation. Additionally, information about CAPP can be shared with individuals who participate in the Safe Parking program that will expand across the City. The Safe Parking program aims to work with businesses and faith-based organizations to provide safe overnight parking in their parking lots. To account for the expected increase in participation, LADOT submitted a budget request in the 2018-19 Proposed Budget to convert part-time positions to full-time positions and ensure that appropriate position classifications are dedicated to CAPP.

CAPP Guideline Adjustments

The CAPP guidelines outline the eligibility, process, and terms and conditions associated with the program. Although these guidelines were a good starting point to launch the program, LADOT now recommends several revisions. Recommended changes include to specify eligibility requirements, to expand non-eligible citations as part of the program, to increase the community service hours based on citation amount owed, and other language improvements that will allow LADOT to effectuate the intent of the program.

While most of the recommended changes will not substantively change the CAPP processes currently in place, they will help LADOT improve efficiencies and allow for the program to gradually expand. The following table summarizes LADOT recommendations with all revisions highlighted in Attachment I:

| Guidelines Section | Recommended Change | Reason for Change |
|--------------------|--|--|
| A. | Identify LADOT as the Designated Administrative Agency responsible for the Rules and Regulations. Allow LADOT to make technical adjustments to the program to streamline administrative procedures and incorporate process improvements. | Certain technical adjustments will be necessary to continue implementing CAPP (i.e., streamlining administrative procedures, partnering with social service agencies, updating forms, etc.) Therefore, LADOT is requesting authority to make ad hoc adjustments, with concurrence from the Office of the City Attorney, that will continue to effectuate the intent of the Council approved program. |
| E. | Individuals wishing to participate in CAPP must be referred to LAHSA or a Social Service Agency to obtain a Homeless Management Information System (HMIS) number to qualify. | Currently, CAPP participants follow this process. LAHSA and other social service agencies are qualified and have the resources to determine an individual's homeless status and assess their service needs. The determination process also helps deter individuals from falsely claiming homeless status. |
| G. | Increase the existing amount of community service hours by 50%. For example: \$25 - \$250 from 4 hrs to 6 hrs, \$251 - \$500 from 8 hrs to 12 hrs, up to \$1,251 - \$1,500 from 24 hrs to 36 hrs. | Service providers requested additional hours as the current hour structure caused a negative service impact. Some organizations reported that they spent more time with the intake and documentation procedures for the participant than actual community service performed. The service amount per hour ranges from \$4 to \$42 per hour. |
| H. | Allow eligible individuals to perform community service for all parking citations. This includes safety violations with an additional four hours of community service | Safety violations listed in the original policy are not allowed for community service. This change will allow participants to remove all parking citations to lift DMV holds and clear all outstanding violations. The additional penalty |

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| | added. | aims to deter repeat offenders of safety-related violations. |
| I. | The participant will be responsible for any fees incurred by the tow company. In addition, the participant must pay 40% of the installment payment plan to have the vehicle removed from the lot. The remaining 60% could be eligible for CAPP. | The cost to withdraw a vehicle from impound is high for a homeless individual. The cost includes the tow yard fees and the total citation amount (which most likely includes multiple citations and penalty amounts). Since the tow company is contracted with the City, the tow company will not waive those fees, and the City does not have funding to cover the costs for tow-related fees. The City can however, deem the citation eligible for CAPP to relieve the financial burden on the individual. |
| J. | Require that only the registered owner of a vehicle can participate in CAPP. | The registered owner is ultimately responsible and held liable for the violations incurred from the use of their vehicle. A second party cannot participate in CAPP to complete service hours on behalf of the registered owner. This helps prevent registered owners from commissioning second parties to complete service hours on their behalf. Currently, the guidelines do not specify who can participate in CAPP. |

LADOT worked with the Office of the City Attorney, various social service agencies, and Conduent to develop the proposed CAPP guideline revisions. The CAPP guidelines with revisions tracked, and the final proposed CAPP guidelines are attached for comparison (Attachments I and II, respectively). If approved, LADOT will continue to work with all parties involved in order to ensure that the program is administered according to the intent of the City Council.

FISCAL IMPACT STATEMENT

LADOT does not expect a significant revenue impact to the General Fund resulting from the number of citations paid through community service. LADOT anticipates an impact to the General Fund due to the need for additional staff to support the expansion of the program. LADOT submitted a budget request for these positions in the 2018-19 Proposed Budget in the amount of \$186,444.

Attachments

Guidelines for the City of Los Angeles Department of Transportation Community Assistance Parking Program (CAPP)

A. Description of Program

The Community Assistance Parking Program (CAPP) provides a mechanism for people to "pay" their parking citation fines (including any late payment penalties) issued in the City of Los Angeles through community or support service. The program is available to participants and non-participants in Los Angeles Homeless Service Authority (LAHSA) funded programs. The Los Angeles Department of Transportation (LADOT) is the Designated Administrative Agency responsible for the rules and regulations of the program and will make any necessary adjustments to effectuate the intent of the program.

B. Community Service

This program substitutes community or support service in lieu of payment of an eligible applicant's parking citation fines and any late payment penalties. The structure is neither coercive nor punitive in nature; rather it is designed to allow those who want to account for their parking fines to do so by making a meaningful contribution to their community through community service or through support service (ex. job training, life skills class, alcohol and drug rehabilitation, etc.).

C. Participating Social Service Agencies

The participant will utilize a list of participating social service agencies (non-profit service providers, faith-based organizations, and public agencies) that already work with LAHSA. However, if an agency is not associated with LAHSA, then an independent review will be conducted by LADOT staff to see if they qualify.

D. Eligibility

Eligibility is determined by the social service agency in accordance with the program guidelines. The participant must obtain a Homeless Management Information System (HMIS) number issued by LAHSA or any social service agency having access to HMIS. After receiving an HMIS number, the participant is deemed eligible to participate in CAPP.

E. Application and Completion of Community Service

Step 1 - The applicant is referred to the program by his/her case manager from the agency he/she is receiving services from.

Step 2 - The case manager/program staff assists the applicant in completing the CAPP application and helps the participant in selecting a service provider from one of the participating agencies.

Step 3 - The case manager submits the application to the City (LADOT) designated representative.

Step 4 --The case manager arranges for the completion of community or support service and submits the completion documents to LADOT so that LADOT can remove the fines from the citation record.



FULL CREDIT = Completion of all required community service hours.

PARTIAL OR NO CREDIT = Partial completion or non-completion of the required service hours.

F. Review by LADOT

LADOT will provide timely review of completion documents and communicate its decision on whether or not to clear the citation(s) to the case manager/service provider and LADOT will then request that the social service agency enter the information into the client's case notes in the Homeless Management Information System (HMIS). If necessary, LADOT will provide sufficient documentation to the case manager so the participant can clear the citation(s) with the Department of Motor Vehicles (DMV) if there is a DMV registration hold. It is the participant's responsibility to address any other fees in addition to a parking citation.

G. Guideline for Converting Monetary Fines to Community Service

| <u>Amount Owed</u> | <u>Required Service Hours</u> |
|--------------------|-------------------------------|
| \$25 - \$250 | 46 |
| \$251 - \$500 | 812 |
| \$501 - \$750 | 1218 |
| \$751 - \$1,000 | 1624 |
| \$1,001-\$1,250 | 2030 |
| \$1,251 - \$1,500 | 2436 |

H. Non-Eligible Citations (Safety Violations)

~~The following safety violations are not eligible as part of this program.~~

All citation violations are eligible for the program. However, safety related violations will incur a penalty of an additional four (4) service hours per citation. For example, if there are two citations that are safety violations, a total of 8 hours will be added to the required service hours. Safety violations eligible for the penalty include but are not limited, to the following:

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| LAMC 80.53 | Standing in parkways prohibited |
| LAMC 80.56(E)4 | No stopping, standing or parking in a red zone and No Stopping Any Time. |
| LAMC 80.61 | No stopping, standing or parking in an alley. |
| CVC 22500.1 | Parking in a fire lane |
| CVC 22500A | In intersection |
| CVC 22500B | On crosswalk |
| CVC 22500C | Safety zone |

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| CVC 22500E | Blocking driveway |
| CVC 22500F | Parked on a sidewalk |
| CVC 22500H | Double parking |
| CVC 225001 | Bus zone (school or public transportation) |
| CVC 22500L | Blocking sidewalk wheelchair ramp |
| CVC 22502(A) | Over 18" from right curb/Wrong-way |
| CVC 22502(B) | Against traffic flow |
| CVC 22507.8(a) | Parked in a disabled parking space |
| CVC 22507.8(b) | Blocking access to disabled parking |
| CVC 22507.8(c)(1) | Disabled parking boundary lines |
| CVC 22507.8(c)(2) | Disabled parking crosshatch lines |
| CVC 22514 | Within 15 feet of fire hydrant |
| CVC 22522 | Parking within 3' of a disabled access ramp |

The list of safety violations may increase or decrease per changes to City and State vehicle code regulations.

I. Additional Terms and Conditions

LADOT allows people to perform volunteer community service in lieu of paying parking citations subject to the following requirements:

- ~~Citations are not eligible for enrollment after a vehicle has been booted or towed, have been previously paid with bounced checks, or have had disputed credit charges.~~
- When a vehicle is towed or booted, any related impound fees are not eligible for enrollment. To release a vehicle from impound, a CAPP participant can apply for an Installment Payment Plan and pay the initial 40% payment. The remaining 60% owed can be paid through CAPP. The same eligibility requirements apply to qualify for this program.
- Once a citation is enrolled in the CAPP, it may not be contested.
- The community service hours (CONTRACT) must be completed and approved by LADOT to receive a DMV abstract for vehicle registration renewal.
- A maximum of two CONTRACTS with a maximum combined total of 10 citations and up to a combined value of \$1,500 of fines/penalties may be enrolled in the program per 12 month rolling period (which begins on the start date of the contract). The first contract must be completed before a second contract can be issued.
- Participants must complete the community service hours within 90 calendar days from the start of the contract. Failure to do so will result in the contract being canceled and reassigned to the collection process. Citations enrolled in a canceled contract are not eligible for enrollment in another contract during the 12-month rolling period.
- If the participant is unable to complete the community service hours within 90 calendar days from the start of the contract, participants may pay the balance owed to the City of Los Angeles by the due date on the contract. The City may authorize one 30-day extension at its discretion. If another extension is requested, this will be determined on a case-by-case basis. If the balance

owed is not received by the due date on the contract, the citation(s) will be reassigned to the collection process.

- Only the registered owner of the vehicle receiving the citation can participate in the program.

J. Statistical Data and Measuring Effectiveness of the Program

LADOT will maintain detailed and accurate tracking of statistical data, including the number of citations cleared; the number of community service hours performed to clear the citations; and conduct a regular evaluation of the program to determine whether it is having a positive impact on the City's homeless population.

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|--------------------|-------------------------------|
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| \$251 - \$500 | 12 |
| \$501 - \$750 | 18 |
| \$751 - \$1,000 | 24 |
| \$1,001-\$1,250 | 30 |
| \$1,251 - \$1,500 | 36 |

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