



500 Summer St NE E35

Salem, OR, 97301

Voice: 503-945-5772 or 800-527-5772

Fax: 503-373-7689

TTY: 711

www.oregon.gov/OHA/HSD

Date: January 6, 2022

To: Coordinated care organizations (CCOs)
Fee-for-service non-emergent transportation (NEMT) brokerages
OHA-enrolled NEMT providers

From: Donny Jardine, Medicaid Transformation Programs Manager
Dave Inbody, CCO Operations Manager

Subject: New licensure requirement for secure transport providers of children

Senate Bill [710](#) (2021) imposed a new licensure requirement for secure transport providers of children effective January 1, 2022. Secure transport is a type of NEMT for which CCOs and fee-for-service (FFS) brokerages are responsible for their respective Oregon Health Plan members.

Under SB 710, secure transport providers of children are required to be licensed as a Child Caring Agency (CCA) through the Oregon Department of Human Services (ODHS) if their medical transportation of a child starts or ends:

- At a [CCA licensed by ODHS](#);¹ or
- At a CCA-like entity in another state that would require licensure if located in Oregon.

ODHS notified secure transport providers about the new requirement last summer and provided them with the application packet in the fall, following approval of the temporary Oregon Administrative Rules (OARs). ODHS also communicated with CCO Oregon about the requirement. However, there has been limited response from secure transport providers, and no secure transport provider has completed the licensure application process to date.

Please be aware the law does not give ODHS or OHA flexibility to allow providers to provide secure transport to or from a CCA without being licensed as a CCA.

Details of the new license requirement are provided in OAR [Chapter 413, Division 215](#), both in the umbrella licensing section (starts at 413-215-0001) and in the secure transportation services section (starts at 413-215-1101).

What should you do?

CCOs and FFS brokerages should notify their secure transport providers about the requirement and communicate their expectation for providers to pursue licensure as a CCA.

¹ The ODHS list identifies each agency licensed as CCA, but not each site operated by the CCA.

Secure transport providers should contact Todd Cooley, Licensing Coordinator for the ODHS Children’s Care Licensing Program, at Todd.Cooley@dhsoha.state.or.us or 971-304-5112 to request a CCA licensure application packet.

CCOs and FFS brokerages should contact both of the ODHS and OHA staff listed below to communicate any difficulty they experience with providers pursuing CCA licensure:

- Todd Cooley, Licensing Coordinator for the ODHS Children’s Care Licensing Program, at Todd.Cooley@dhsoha.state.or.us.
- Carrie Wouda, Licensing and Certification Compliance Specialist for OHA Licensing and Certification, Health Systems Division, at Carrie.Wouda@dhsoha.state.or.us.

NOTE: The “child in care” definition for individuals residing in or receiving care or services from a CCA includes “...an unmarried person under 21 years of age”. The definition of CCA in ORS 418.205 specifically *excludes* a facility that exclusively serves individuals 18 years and older. Since secure transport providers of children are considered CCAs effective January 1, 2022, secure transport providers that exclusively serve individuals 18 years and older are not subject to the new licensure requirement.

Questions?

For questions about the new licensure requirement, contact Todd Cooley, Licensing Coordinator for the ODHS Children’s Care Licensing Program, at Todd.Cooley@dhsoha.state.or.us or 971-304-5112.

CCOs: For general questions about this communication, contact Cheryl Henning, CCO Contracts Administrator, at Cheryl.L.Henning@dhsoha.state.or.us.

FFS brokerages: For general questions, contact Donny Jardine, Medicaid Transformation Programs Manager, at Donald.Jardine@dhsoha.state.or.us.

Thank you for your continued support of the Oregon Health Plan and the services you provide to our members.