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**Date:** July 9, 2020

**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:** Expired Oregon DMV-issued driver licenses and vehicle registrations for NEMT drivers

CCOs, brokerages, and NEMT providers may allow drivers with expired Oregon driver licenses or vehicle registrations to serve Oregon Health Plan (OHP) members if their license or registration expired during the period of limited access to DMV offices due to the COVID-19 pandemic.

- This period of flexibility is for expirations from March 18, 2020, through October 1, 2020, the same end date as the [Oregon DMV's current law enforcement moratorium on citations](#).
- If the DMV's moratorium is extended past October 1, this period of flexibility is also automatically extended to the same date.

This flexibility does not:

- Alter other requirements that apply to NEMT providers, including training, insurance, criminal background checks, credentialing, incident reporting, safety equipment, and accessibility; or
- Apply to DMV licenses and registrations that are invalid for other reasons, such as motor vehicle violations.

This guidance is issued under authority of Oregon Administrative Rule (OAR) [410-120-0011](#).

### What should you do?

OAR [410-141-3925\(4\)\(a\)](#) and Exhibit B, Part 2, Section 5 f. (2)(d)i. of the [CCO 2.0 contract](#) require CCOs to ensure that each NEMT driver has a valid driver license prior to hire. The contract also requires NEMT providers to document current vehicle registration. [OAR 410-136-3040\(4\)\(a\)](#) requires NEMT brokerages to ensure that each subcontracted NEMT driver has a valid driver license prior to hire.

To ensure that these requirements are met during the moratorium, CCOs, brokerages, and NEMT providers must:

- Identify in their records each NEMT driver allowed to serve OHP members with an expired driver license or vehicle registration during the period of flexibility, and
- Require affected NEMT drivers to renew their expired driver licenses and vehicle registrations before the moratorium expires.

Please refer to the Oregon DMV's [COVID-19 webpage](#) for information about the law enforcement moratorium (or “grace period”).

### **Questions?**

CCOs should contact Cheryl Henning, CCO Contracts Administrator, at [Cheryl.L.Henning@dhsoha.state.or.us](mailto:Cheryl.L.Henning@dhsoha.state.or.us) about this communication.

Fee-for-service NEMT brokerages and OHA-enrolled NEMT providers should contact Kian Messkoub, NEMT Program Manager, at [Kian.Z.Messkoub@dhsoha.state.or.us](mailto:Kian.Z.Messkoub@dhsoha.state.or.us).

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