



**Date:** September 2, 2021

**To:** Fee-for-service (FFS) and coordinated care organization (CCO) non-emergent medical transportation (NEMT) providers

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

**Subject:** NEMT brokerage flexibility to use private commercial transportation options

During the COVID-19 public health emergency, brokerages can allow Oregon Medicaid members to use private commercial transportation options, including taxicab companies and transportation network companies (TNCs) like Uber and Lyft. If their brokerage chooses to pursue this option, members can hail rides from these services and request reimbursement directly from the brokerage.

### Why is this happening?

The Oregon Health Authority (OHA) recognizes the challenges provider networks may face due to COVID-19's direct impact on driver availability to provide rides to Medicaid members. The Centers for Medicare & Medicaid Services (CMS) confirmed that OHA has the authority for client reimbursements for taxicab and TNC rides under Attachment 3.1-D (Assurance of Transportation) of Oregon's Medicaid State Plan.

### What should you do?

In accordance with the long-standing requirement of arranging for the least costly, most appropriate mode of transportation, the brokerage should:

- Screen members for primary options, including driving themselves, or having family members drive them.
- Explain to members that they can use a taxicab or TNC.
- Verify that the appointment is for a Medicaid-covered service.
- Approve the member to hail the TNC or taxicab, if that option is the least costly, most appropriate mode of transportation available.
- Explain to the member that after taking the ride, they should submit receipts and other necessary paperwork to the brokerage to request reimbursement as outlined in Oregon Administrative Rule (OAR) [410-136-3240\(2\)](#) and OAR [410-141-3960\(4\)](#).
- Reimburse members for these rides, following the same process used for client gas reimbursement.

### Questions?

- **FFS brokerages:** Please contact [Kian Messkoub](#), NEMT Program Manager (971-283-6563).
- **CCO brokerages:** Please contact [the member's CCO](#).

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