



**Date:** January 15, 2021

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

**From:** Donny Jardine, Medicaid Transformation Programs Manager  
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**Subject:** Current NEMT requirements for expired licenses and vehicle registrations during COVID-19

According to [current guidance from the Oregon Department of Motor Vehicles \(DMV\)](#), CCOs, brokerages, and NEMT providers may allow drivers with expired Oregon driver licenses or vehicle registrations to serve eligible Oregon Health Plan (OHP) members if:

- Their license or registration expired between Nov. 1, 2020, and April 30, 2021; **and**
- The license or registration has been expired for three months or less.

A three-month grace period will apply for these drivers while they wait for their appointment with DMV.

### Why is this happening?

The moratorium described in the Oregon Health Authority's [July 2020 memo](#) applied only to expirations that occurred between March 1, 2020, and Oct. 31, 2020. Drivers with expirations at that time were expected to complete their license or registration renewal by Nov. 1, 2020. Senate Bill 1601 (2020 1<sup>st</sup> Special Session) [extended that moratorium to Dec. 31, 2020](#), but it is now expired.

### What should you do?

Oregon Administrative Rule (OAR) [410-141-3925\(4\)\(a\)](#) and Exhibit B, Part 2, Section 5 g. (2)(d)i. of the [2021 CCO contract](#) require CCOs to ensure each driver has a valid license. The contract also requires NEMT providers to document each driver's current vehicle registration. [OAR 410-136-3040\(4\)\(a\)](#) requires brokerages to also ensure each subcontracted driver has a valid license.

To meet OAR and contract requirements, CCOs, brokerages, and NEMT providers must ensure:

- Drivers renew their driver licenses and vehicle registrations before the grace period expires;
- Drivers do not serve eligible OHP members if their driver license or vehicle registration has been expired for more than three months; and
- Records on file with the CCO, brokerage or NEMT provider document each driver allowed to serve eligible OHP members with an expired driver license or vehicle registration during the grace period.

### Questions?

- CCOs should contact their assigned Account Representatives about this communication.
- Fee-for-service NEMT brokerages and OHA-enrolled NEMT providers should contact Provider Services at [DMAP.ProviderServices@dhs.oha.state.or.us](mailto:DMAP.ProviderServices@dhs.oha.state.or.us).

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