## State of Arkansas Department of Human Services

710-25-049 Non-Emergency Medical Transportation Services

Attachment B

Written Questions

## Instructions

This Response Template must be used for submission of written questions. All questions should provide the requested information. Those that do not, may not be answered by DHS. The Vendor may add as many lines as needed. DHS would strongly prefer the Vendor to ask multi-part questions as individual questions on seperate lines.

Instructions: Complete all cells of each question asked in the Table below. Clearly identify the referenced section or text.

Question ID	Reference (page number, section number, paragraph)	Specific Language	Question	Answers
Example	Page 7, section 1.15, C	J. Vendors may submit multiple bid	May vendors submit more than one bid?	yes See section 1.15, J
1			Please clarify: If the solicitation allows for bids on a single county within a region?	No, all bids must be for an entire region or regions.
2			If not, are there any options for subcontracting or partnership that would enable participation at the county level?	Yes, you may subcontract with another vendor to serve a portion of that vendor's region, but the subcontracting process is between the prime vendor and the subcontractor. DHS does not coordinate the subcontracting work. Refer to Section 1.11 of the Revised Solicitation.
3	Pg 49, 2.30.L.4	If the Broker's actual service costs PMPM falls below ninety-five percent (95%) of the targeted service costs PMPM, the Broker <b>shall</b> remit payment to DHS in an amount equal to the amount of the actual service cost PMPM that falls below the 95% targeted service cost PMPM multiplied by the contracted period member months.	Should a broker be awarded more than one contract region, will DHS continue to allow the Broker to sum all contracted region values and then perform the 95% targeted service cost determination?	Yes, the practice of pooling all contract regions will continue.
4	Page 20, Section 2.6, A.2	"Beneficiary enrolled in ARHOME requests NET to an enrolled Medicaid or non-Medicaid provider within their commercial insurance plan network."	Can DHS clarify the Broker's responsibilities for managing ARHOME transportation requests, including coordination with commercial insurance networks and provider validation? Additionally, is the trip volume, and distance for these members available? Are these beneficiaries included in the transportation databook provided by DHS?	There is no requirement to coordinate with commerical insurance networks, outside of getting provider network directories. Yes, trip volume /distance for members is available and these beneficiaries are included in the transportation databook.
5	Page 5–6, Sections 1.8 and 1.12	"Bid Response Packet" and "Vendor(s) must include all pricing on the Official Bid Price Sheet(s) only."	Can DHS clarify whether this procurement will be evaluated solely on price, or if qualitative elements (e.g., operational readiness, staff qualifications, or technical approach) will be evaluated as part of responsiveness? Additionally, should vendors provide any form of technical proposal narrative beyond the required forms and attachments?	Bids will be evaluated based on price and meeting solicitation requirements and criteria in accordance with Ark. Code Ann. 19-11-229. Refer to Section 1.18 of the Revised Solicitation for the award process and the Documentation Checklist in the Response Packet.
6	Page 5, Section 1.8, A.3.e and Section 2.2	"Documentation that vendor meets the minimum qualifications" and "The Broker shall have a minimum of five (5) years of experience in non-emergency medical transportation."	To ensure consistency and compliance, can DHS clarify the expected format and level of detail for documenting minimum qualifications—specifically regarding how vendors should demonstrate organizational experience and staff qualifications beyond Attachment I?	DHS will verrify this requirement using Attachment I: Client History Form, alongside any other requirements outlined in the Minimum Qualfications. Refer to Section 2.2 of the solicitation.
7	Page 6, Section 1.12, B	"A justification of prices quoted should be attached to the Official Bid Price Sheet."	Can DHS clarify what constitutes an adequate price justification—should vendors include a narrative explanation of pricing methodology (e.g., unit cost assumptions, regional labor rates, vehicle operations), or will a cost breakdown table suffice?	

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8	Page 24, Section 2.8 G # 2 a	The Broker shall not begin the disenrollment process unless and until the Broker has received approval from DHS to disenroll the beneficiary	Can DHS clarify this section since the Broker historically does not disenroll members?	Requirement removed. Refer to Addendum 2 and Section 2.8 of the Revised Solicitation.
9	Page 26, Section 2.10 B #2	The Broker shall not allow a person associated with an agency, provider, or other entity to which transportation might be request to act as an authorized representative.	Are the Facilities allowed to still send over standing orders for members?	Yes, for EIDT and ADDT, and medical facitilies that provide regular, longterm care such as dialysis or chemotherapy treatment services.
10	Page 27 Section 2.12 B	If the Broker secures TNC transportation service for a Beneficiary, the the Broker shall report such fact to the Monitoring Contractor and include the date in the performace reports.	Can DHS clarify if this will replace the daily report that is being sent to DHS currently?	Refer to Addendum 2 and Section 2.12.B of the Revised Solicitation.
11	Page 31 Section 2.16, S 3	In instances where a Beneficiary needs a ride home from an emergency room visit, the Broker shall do their best to accommodate for this transportation.	Can DHS clarify if this is only during the business hours of 8am Spm Central? Is this in addition to the 23 hour hold for discharges?	Yes, only within business hours and is in addition to the twenty- three (23) hour hold.
12	Page 62 Section 2.21, F.	The exterior of all vehicles shall be clean and free of broken or cracked mirrors, windows, or windshields, excessive grime, major dents, or paint damage that detract from the overall appearance of the vehicles.	Can you please provide a clear definition or criteria for what constitutes a "major dent" under this standard?	Major dents require more extensive work, including repainting, panel replacement, and more significant metal work. A professional appearance should be maintained to reflect a vehicle that is safe to ride.
13	Page 62 Section 2.21, F.	The exterior of all vehicles shall be clean and free of broken or cracked mirrors, windows, or windshields, excessive grime, major dents, or paint damage that detract from the overall appearance of the vehicles.	Can you please provide a clear definition or criteria for what constitutes "excessive grime" under this standard?	Excessive grime refers to a thick, ingrained layer of dirt, grease, or other accumulated debris that is difficult to remove. A professional appearance should be maintained to reflect a vehicle that is safe to ride.
14	Page 62 Section 2.21, F.	The exterior of all vehicles shall be clean and free of broken or cracked mirrors, windows, or windshields, excessive grime, major dents, or paint damage that detract from the overall appearance of the vehicles.	Can you please provide a clear definition or criteria for what constitutes "paint damage that dectracts from the overall appearance of the vehicle. " under this standard?	A professional appearance should be maintained to reflect a vehicle that is safe to ride.
15	page 63 Section 2.21, I.	All vehicles designed to transport more than seven (7) passengers and one (1) driver <b>shall</b> have a child safety alarm buzzer/device to alert the driver to check the vehicle for children before leaving the vehicle.	If the vehicle is not used to transport children, is the child safety alarm still required?	Yes.
16	page 63 Section 2.23, b.	Tires	Is there a recommended minimum tread depth for replacing tires?	Refer to Addendum 2 and Section 2.21.R of the Revised Solicitation.
17	page Section 2.30, O.	The Broker <b>shall</b> immediately notify, but no later than 30 minutes after, the NET Monitoring Contractor and DHS of any accident while providing services under the Contract, whether or not it resulted in a driver or passenger injury or fatality.	Given the requirement to notify the NET Monitoring Contractor and DHS within 30 minutes of any accident, regardless of injury or fatality, can you please confirm your preferred method for receiving these notifications (e.g., phone call, email, secure portal)? Additionally, is there a designated point of contact or protocol we should follow to ensure timely and compliant reporting?	Refer to Addendum 2 and Section 2.30.0.1 of the Revised Solicitation.
18	page Section 2.25, D.	Documentation of certified training for child passenger safety, defensive driving, lift operation and wheelchair securement.	Do drivers who do not transport children need to take the child passenger safety training?	Yes.
19	Page 19, Section 2.6, A	"Eligibilityto determine general eligibility and ARHOME beneficiaries."	Will the department provide frequent eligibility files to the Broker that contain the information needed to determine general eligibility and identify ARHOME beneficiaries?	Yes, DHS plans to supply Broker with the 834 files daily.

20	Page 20, Section 2.6, C	"DHS may require transportation for Medicaid Beneficiarieswho do not meet criteria as specified by this IFB."	Does DHS have any historical data on the frequency of these exception-based transportation requests, and is there a mechanism for Brokers to invoice DHS for these trips?	DHS is not aware of any instances of exception-based transporation requests. These requests would be handled on a case-by-case basis with trip rate and invoice instructions to be determined by DHS and provided at that time.
21	Page 38, Section 2.23, G.3	"Any damage to the vehicle must be diagrammed."	Will the department accept clear digital photographs as a substitute for hand-drawn diagrams when documenting vehicle issues or points of damage?	No, DHS will not accept photographs in lieu of a diagram. Diagrams can be computer generated. And photos can be provided in addition to the diagram.
22	Page 23, Section 2.8, E	"The Broker shall verify that the Beneficiary is eligibleon the day the trip is scheduled."	Will DHS provide a daily eligibility file or make an API available so Brokers can programmatically verify trip-day eligibility?	Yes, DHS plans to supply Broker with the 834 files daily.
23	Page 34, Section 2.21, C	"Vehicles must have a fully functioning heat and air system that shall be kept at a reasonable range"	Can the department specify the acceptable temperature range for heating and cooling systems? For example, should air conditioning reduce the output temperature by 20°F below ambient temperature?	Refer to Addendum 2 and Section 2.21.C of the Revised Solicitation.
24	Official Bid Price Sheet	"Actuarial Spread"	What were the dates of the information considered in creating the actuarial rate ranges? What assumptions were included for changes in utilization? If utilization deviates significantly from the utilization assumed in the creation of the actuarial rate range, will there be an opportunity to update pricing?	Refer to the updated Bidder's Library for actuarial calculations.     Refer to Section 2.33 Rates and Payment and Section 3.6 Price Escalation. Per Title 42 CFR 438.6(c) requires that capitation rates paid by the state must be certified as actuarially sound.     Yes
25	Page 52, Section 2.31, Technology Requirements, E	"The Broker must comply with DHS/Office of Information Technology (OIT) Standard information technology requirements, as specified in Attachment J – ARDHS – OIT-Standard IT Requirements."	At what point in the process will Broker(s) be required to complete and submit Attachment J? Can the Department confirm Attachment J is not required to be submitted with the bid?	Refer to section 2.31.E of the revised solicitation.
26	Page 62, Section 3.4, A.1	"The Contractor shall be required to obtain performance bonds to protect the State's interest as follows: 1. The amount of the performance bonds shall be one hundred percent (100%) of the annual contract price, unless the State determines that a lesser amount would be adequate for the protection of the State. Such performance bond must be provided to DHS prior to signing the contract."	Will DHS consider using a similar percentage of annual valuation for bonding as is used in the current contract?	No.
27	Page 46, Section 2.30, A.	A. Unless otherwise specified herein for a particular report, the Broker shall submit all required reports by uploading the data into the NET Monitoring Contractor's portal no later than the fifteenth (15th) business day of the month following the reporting month.	Will the NET Monitoring Contractor have the capability to accept reports by "go live" date?	Yes.

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28	Page 46, Section 2.30, B. 1.	<ul> <li>B. In all reporting, the Broker shall identify the ADDT/EIDT transportation data separately from all other transportation types where applicable, as well as provide combined reports to reflect the complete services provided under the Contract.</li> <li>1. The Broker shall collaborate with the NET Monitoring Contractor to determine the format of reports.</li> </ul>	What data elements will DHS expect brokers to submit for ADDT/EIDT reporting?	Within the NET reports, a distinguishing element must be used to identify if the transportation is to or from an ADDT/EIDT facility. See Section 2.30.B of the revised solicitation.
29	Page 49, Section 2.30, K., 14.	<ul> <li>K. Status Reports</li> <li>1. During the execution of activities of the contract, Brokers shall submit monthly status reports covering activities, problems, and recommendations.</li> <li>2. Brokers shall submit status reports no later than the fifteenth working day of each month.</li> <li>3. The status report must cover any escalations handled by the Broker within the month, vehicle inspections, staff turnover, and any other activities as determined by DHS.</li> <li>4. These reports must be submitted to DHS or the NET Monitoring Contractor, as directed.</li> </ul>	What is the intent of DHS to allow brokers to submit items to DHS <b>"or"</b> the NET Monitoring Contractor?	Currently, DHS and the Monitoring Contractor receive reports as designated for each. The Broker will follow the DHS directive for which reports go to which recipient.
30	Page 49, Section 2.30, K., 14.	<ul> <li>K. Status Reports</li> <li>1. During the execution of activities of the contract, Brokers shall submit monthly status reports covering activities, problems, and recommendations.</li> <li>2. Brokers shall submit status reports no later than the fifteenth working day of each month.</li> <li>3. The status report must cover any escalations handled by the Broker within the month, vehicle inspections, staff turnover, and any other activities a determined by DHS.</li> <li>4. These reports must be submitted to DHS or the NET Monitoring Contractor, as directed.</li> </ul>	Would DHS prefer all documents be submitted to the NET Monitoring Contractor to minimize confusion?	Currently, DHS and the Monitoring Contractor receive reports as designated for each. The Broker will follow the DHS directive for which reports go to which recipient.
31	Page 49-50, Section 2.30, M., 14.	<ul> <li>M. Driver Reports</li> <li>1. The Broker shall provide the DHS NET Monitoring Contractor with a roster of drivers two (2) weeks before the service start date.</li> <li>2. Driver's name (include at a minimum: <ul> <li>a. Driver's name (including maiden and/or previously used names).</li> <li>b. Driver's date of birth.</li> <li>c. Arkansas driver's license number.</li> <li>d. Date of hire.</li> <li>e. Date of discharge.</li> </ul> </li> <li>4. The Broker shall ensure the roster is: <ul> <li>a. Updated immediately so that in-house records accurately reflect additions and deletions in personnel.</li> <li>b. Submitted to DHS the fifteenth working day of the calendar month following the end of the reporting month.</li> </ul> </li> </ul>	Has DHS removed the Broker's requirement to submit to the NET Monitoring Contractor actual driver and attendant compliance documents such as driver records, criminal background checks, FBI checks, adult and child maltreatment checks, and state driver's license, etc., since it is not listed in this section or elsewhere in the IFB?	Refer to Addendum 2 and Section 2.30.M.5 of the Revised Solicitation.
32	Exhibit 2-ADDT-EIDT-Transportation-Databook- Jan-2022-Dec-2024	Trips Column	Could DHS provide historical call data for the past three (3) years that aligns with the data provided in Exhibit 2?	Refer to the Bidder's Library for all available data.

33	710-25-049 Solicitation (Page 42, section 2.27, C)	Operators shall always be available while transportation services are in progress (i.e., from the time of first pick-up until the time of last drop-off for the day). DHS may request to modify hours of operation, and the Broker shall abide by any modification.	Could DHS please confirm if call center services may be subcontracted to a 3rd party? If yes, please confirm only onshore services are permitted.	Yes call center services may be subcontracted. Yes, only onshore (within the United States) services are permitted.
34	Exhibit 1-SFY24-Transportation -Databook- excluding-EIDT-ADDT-2025	NET Services by Region	Could DHS please provide historical trip data from January 2022 through June 2023?	Refer to Exhibits 1 and 2 of the bidder's library.
35	710-25-049 Solicitation (Page 29 Section 2.16 D)	The Broker is required to advise Beneficiaries of scheduling requirements, including the two (2) exceptions stated above in 2.16 (C), and Broker contact information shall be provided by the Broker through the distribution of OHS-approved communication tools such as the Beneficiary Handbook, brochures, and posters. Other means of communication, such as text or email, may also be approved.	Could DHS please confirm that both email and chat are currently communication options used today? If yes, please provide any utilization data for the last year.	Yes, text and email are currently used by vendors in some regions. Utilization data is not readily available.
36	710-25-049 Solicitation (Page 15, section 2.4, C)	The Broker's central business office shall be fully operational on the Contract start date and shall have the capability to receive Beneficiary reservations ten (10) business days prior to the Contract start date.	Will DHS please confirm that the brokers call center may be located outside of the central business office and may include work from home employees?	Yes, call center may be located outside of the central business office and may include work from home employees, but all employees must reside within the United States.
37	710-25-049 Solicitation (Page 7, section 1.8, A)	This contract shall be a multiple contract award. DHS plans to award contracts to seven (7) respondents, one (1) respondent for each seven (7) regions.	Will DHS please confirm whether a broker submitting bids for multiple regions is eligible to be awarded more than one region?	Yes. Award of a region will go to the lowest bidder, and if a broker is the lowest bidder for multiple regions, that broker will be awarded multiple regions. Refer to Section 1.18.A.1 of the Revised Solicitation.
38	710-25-049 Solicitation (Page 27, section 2.12, C)	For all other NET transportation (non EIDT/ADDT) services, the Broker may offer alternative means of transportation, which may include: a. Not-for-profit agencies. b. Transit authorities. c. Licensed transportation network carriers (TNC), such as Uber, Lyft, or Taxi.	Given the rural characteristics of Arkansas, which can present unique challenges in securing adequate transportation for health.care access, would DHS consider permitting the awarded NEMT broker to utilize its own on-demand Transportation Network Company (TNC)? This TNC is specifically designed to serve rural areas and employs a driver recruitment model that has effectively engaged traditional healthcare workers seeking supplemental income. This model has been successful in other state programs, particularly during transitions in brokers.	Yes, this model is acceptable as long as all requirements are met and DHS pre-approves this arrangement.
39	710-25-049 Solicitation (Page 2, section 1.3, C)	The term of this contract shall be for one (1) year. The anticipated starting date for the contract is November 1, 2025.	Would DHS please confirm if the expectation is for NEMT services (first ride) under this contract to begin on the anticipated start date of November 1, 2025?	The contract is anticipated to begin on November 1, 2025 so that brokers have time for implementation activities, such as hiring drivers, submitting policies to DHS for review and approval, etc. Actual transportation services begin on January 1, 2026.

				Yes. Transportation providers and others hired by a broker to	
40	710-25-049 Solicitation (Page 17, section 2.4, J)	Broker shall maintain and monitor its capacity to meet transportation needs of all Beneficiaries, including the capacity of all subcontractors, to ensure it is sufficient to provide adequate access to all NET services covered under the contract for all Beneficiaries in the Broker's service region(s), including those with limited English proficiency or physical, intellectual or developmental disabilities.		provide direct services as part of this solicitation are considered subcontractors. Vendors should include known planned subcontractors on the Proposed Subcontractors Form (Response Packet page 4). This will not prevent vendors from adding additional subcontractors at a later time and complying with Section 2.29.	
41	Exhibit 2 DTT Utilization Excel Workbook	Mode of Transportation	Would DHS please provide trip data by level of service or mode of transports? Please provide mileage or average distance by mode of transports.	Refer to the Bidder's Library for all available data.	
42	Page 55, Section A, Paragraph 3, Solicitaion PDF	The PMPM rates that are submitted by the bidder shall be within the range listed on each region's official bid price sheet	Could DHS please provide criteria on how is the price range for PMPM rates determined, and what factors are considered?	Refer to Addendum 2 and Exhibits 3 & 4 of the bidder's library.	
43	Page 55, Section B, Paragraph 1, Solicitaion PDF	A data book (See Exhibits 1 and 2 in the bidder's library) is provided for informational purposes only to assist bidders in understanding the Beneficiary and service utilization from a historical perspective.	Could DHS please confirm if the trip data provided are Paid trips?	While DHS pays for trips on a capitation basis, not per trip, these are the trips used to develop rates.	
44	Page 56, Section D, Paragraph 5, Solicitaion PDF	OHS reserves the right to deduct Medicaid fee adjustments from the Broker's monthly invoice prior to payment.	Could DHS please explain how is the broker going to be notified for this fee adjustment and provide examples of a deduction of a Medicaid fee adjustment ?	Adjustments will show on the 820 monthly capitation file.	
45	Exhibit -1-SFY-Transportation-Data Book	Membership Data	Could DHS please provide information regarding the change in membership from 7/2023 to 6/2024. In each region there is about a 10% membership loss- Do you anticipate any more membership losses ?	Membership has stabilized since the end of the unwind; DHS does not forsee further membership losses.	
46	Exhibit -1-SFY-Transportation-Data Book	Unique Riders	Could DHS please provide unique riders data by month ?	Refer to the Bidder's Library for all available data.	
47	710-25-049-Solicitation Page 13, section 2.2, F	For verification purposes the Prospective Contractor shall submit a Letter of Bondability from an admitted Surety Insurer with bid submission. The letter must unconditionally offer to guarantee, to the extent of one hundred percent (100%) of the annual contract price, the Prospective Contractor's performance in all respects of the terms and conditions of this IFB and the resultant contract.	Historical and current NEMT experience shows on average, Surety Bonds cover 60-90 days of an NEMT programs annual contract value. Would DHS be open to reducing the required Surety Bond duration to a more reasonable timeframe/value? Otherwise, could DHS please provide a rationale for the Surety Bonds to cover a full 12 months of contract value?	No.	
	Below questions added June 30, 2025				
48			We are deeply concerned that these changes will negatively impact individuals who attend ADDT/EIDT programs and rely on NET services for their daily transportation to the program. Will there be any change for ADDT and EIDT providers provide their own transportation and bill Medicaid for it?	There will be no impact for ADDT/EIDT who elect to provde their own transportation to beneficiaries and directly bill Medicaid under Provider type 24, using procedure code A0120.	
49			Will anything change for providers who rely on brokers for their clients' daily transportation to and from day treatment, i.e., will anything about that process change ?	Nothing will change for ADDT that rely on brokers for transportation, they will still rely on them as before.	

50	https://humanservices.arkansas.gov/announce ments/non-emergency-medical-transportation- services/	Solicitation Documents	As of June 26, 2025, several of the revised solicitation documents—specifically Solicitation Revision 1, Performance- Based Contracting Revision 1, and the Revised Response Packet—are returning a "404 Not Found" error and cannot be viewed or downloaded. Given this issue, would the state consider granting an extension to the submission deadline to ensure all vendors have adequate time to review and respond to the updated materials?	Host issue resolved as of 11am June 26, 2025. Links now function correctly. Refer to Addendum 3.
51	710-25-049 Attachment J – ARDHS OIT Standard IT Requirements	New Submission Requirement not originally listed	Given the addition of a new submission requirement containing over 70 IT-related questions, would the state consider granting an extension to the proposal submission deadline to ensure all vendors have sufficient time to thoroughly review and respond to the new documentation?	This document is no longer required with bid submission. Refer to Addendum 3.
52	710-25-049 Written Questions and Answers	Response to Written Questions, On or About June 20, 2025	Given that responses to vendor questions were not released until the evening of June 24, 2025, would the state consider granting an extension to the proposal submission deadline to ensure vendors have adequate time to incorporate the information and provide accurate, comprehensive responses?	
53	Pages 38-39, section 2.23 D. and F.	D. The Broker shall comply with announced and unannounced inspections of vehicles and vehicle maintenance records by the DHS Monitoring Contractor. F. The NET Monitoring Contractor shall also inspect each vehicle at least once annually, with random inspections throughout the year.	NET Monitoring Contractor actual vehicle documents, Broker licensing, and certifications documents, etc., since it is not	Must keep records onsite and be able to produce for inspection and any audits or investigations. Licensing and certifications are listed as requirements in this section. Also refer to Section 2.22 and 2.30.S.
54	Pages 52-53, section 2.30 N. 15.	<ul> <li>N. Vehicle Reports</li> <li>1. The Broker shall provide the DHS NET Monitoring Contractor with a listing of all vehicles placed in service for performance of obligations under this Contract before the provision of service start of operations.</li> <li>2. The list shall include, for each vehicle: <ul> <li>a. Name of Transportation Provider.</li> <li>b. Manufacturer and model.</li> <li>c. Model year.</li> </ul> </li> <li>d. Vehicle Identification Number.</li> <li>e. Type of vehicle (minibus, wheelchair van).</li> <li>f. Last date of inspection and service of the vehicle.</li> <li>3. The roster must be updated to reflect vehicle additions and deletions.</li> <li>4. The updated roster shall be submitted by the fifteenth working day of the month following the end of the reporting month and must include, but is not limited to, the following documentation for each vehicle: <ul> <li>a. Manufacturer, make, and model year.</li> <li>b. Vehicle Identification Number (VIN).</li> <li>c. Odometer reading at the time the vehicle entered service under this contract and current odometer reading</li> <li>d. Type of vehicle - examples include, but are not limited to: minibus, wheelchair van, or NET van.</li> <li>e. Capacity (number of passengers).</li> <li>f. License plate number.</li> <li>g. Insurance certifications.</li> <li>i. Arkansas Department of Finance and Administration-issued registration permit and a vehicle stamp.</li> <li>h. Special equipment (lift, etc.).</li> <li>i. Last inspection and/or service of the vehicle.</li> </ul> </li> </ul>	NET Monitoring Contractor actual vehicle documents, Broker licensing, and certifications documents, etc., since it is not	Must keep records onsite and be able to produce for inspection and any audits or investigations. Licensing and certifications are listed as requirements in this section. Also refer to Section 2.22 and 2.30.5.