

— AN UNDERWRITING PREPARATION GUIDE

# NEMT Insurance *Readiness* Review

*A five-phase guide to help non-emergency medical transportation operators align operational reality with the stringent expectations of modern transportation underwriters.*

COMMERCIAL AUTO

GENERAL LIABILITY

PROFESSIONAL LIABILITY

ABUSE & MOLESTATION

WORKERS COMP

CYBER

EXCESS

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HOW TO USE THIS DOCUMENT

# A structured intake for *NEMT underwriting*.

*The 2026 risk landscape for non-emergency medical transportation has moved from a localized logistics challenge to a high-acuity professional liability environment. Social inflation, broker contract demands, and FMCSA filings have re-shaped underwriting expectations. The five phases below walk operators, fleet managers, and finance leads through the documentation most often requested before a quote can be issued.*

<p><b>01</b>    <b>Fleet &amp; Operational Profile</b>    p. 3</p> <p>Vehicle build history, passenger acuity mix, and operational radius.</p>	<p><b>02</b>    <b>Coverage Architecture &amp; Compliance</b>    p. 4</p> <p>Liability stack, broker requirements, and FMCSA / state filings.</p>
<p><b>03</b>    <b>Mitigation, Technology &amp; Safety Hardening</b>    p. 5</p> <p>Telematics, driver credentialing, securement, and DVIR documentation.</p>	<p><b>04</b>    <b>Operational Portfolio &amp; Layered Exposure</b>    p. 6</p> <p>SAM, cyber, workers comp, excess, and ownership structure alignment.</p>
<p><b>05</b>    <b>Loss History, Safety Culture &amp; Logistics</b>    p. 7</p> <p>Loss runs, corrective action plans, triggers, and submission timing.</p>	<p>→    <b>Ready for Your Review?</b>    p. 7</p> <p>How to send this checklist back to WHINS and start intake.</p>

**DISCLAIMER**    This checklist is educational only. Coverage availability, terms, conditions, and eligibility depend on underwriting review. Nothing in this document constitutes a binder, quote, or guarantee of coverage.

PHASE

# 01

## Fleet & Operational Profile

*The foundation of any NEMT submission is a fleet profile that goes beyond a vehicle list — underwriters in 2026 want a nuanced picture of passenger acuity, modification origin, and operational geography.*

### WHAT TO DOCUMENT

- Vehicle Schedule & Build History**

Year, make, model, VIN, and stated value for each unit. For modified vehicles, list manufacturer or certified upfitter (e.g., BraunAbility), lift capacity, interlock systems, and securement type. Non-certified modifications are a known underwriting concern.

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- Vehicle Classification Mix**

Ambulatory sedans, wheelchair-accessible vans (WAV), stretcher or gurney units, and high-capacity vans (15+). Each tier carries a different acuity profile and equipment complexity.

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- Passenger Acuity Mix**

Approximate split across dialysis, hospital discharge, ambulatory clinic, mental health, and substance-use transports. Documenting the mix supports rate credits for lower-acuity segments.

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- Operational Radius & Permits**

Garaging address, typical and maximum radius, and any interstate operation triggering FMCSA 49 CFR Part 387 (\$1.5M minimum for 1-15 passenger vans). State-specific filings such as CA CPUC TCP / PL 731 or TxDMV livery endorsements.

**WHY THIS MATTERS**  
*Underwriter perspective*

Underwriters classify and price the account based on the highest-acuity work and the riskiest equipment in the fleet. Specific build history, certified modifications, and a documented passenger mix help avoid being grouped with riskier classes — and can mean the difference between a Tier 1 admitted quote and a surplus-lines placement.

PHASE

# 02

## Coverage Architecture & Structural Compliance

*A coordinated liability stack is the only effective defense against the multi-phase exposures of NEMT – from in-transit accidents to loading-zone injuries to professional handling claims.*

### CONTRACTUAL & REGULATORY REQUIREMENTS

- Commercial Auto (CSL)**      Combined single limits aligned with broker contracts – typically \$1M to \$1.5M – and verified to be free of livery or "for-hire" exclusions. Standard ISO commercial auto forms often exclude carrying passengers for a fee unless specifically endorsed.

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- General Liability**      \$1M / \$2M minimum to meet broker contract eligibility (ModivCare, MTM, Veyo). Required to address the loading-and-unloading "curb gap" where 40–60% of NEMT claims occur.

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- Professional Liability & SAM**      Professional liability for negligent care or assistance and Sexual Abuse & Molestation (SAM) coverage for driver-passenger interaction – both increasingly required as separate endorsements.

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- Broker Contract Endorsements**      Primary & non-contributory language, waiver of subrogation, and additional insured status for the broker. Sample COIs aligned to the largest contracts you hold.

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- Regulatory Filings**      FMCSA 49 CFR Part 387 for interstate work, CA CPUC PL 731 filing for TCP holders, NY DOT, TxDMV livery, or other state-specific filings tied to your operating territory.

#### WHY THIS MATTERS

*Contractual exposure*

Broker contracts have become the de facto regulatory floor for NEMT. Missing endorsements don't just create coverage gaps – they trigger immediate contract termination and loss of trip assignments. Reviewing the full liability stack together avoids "coverage disputes" between auto and GL carriers when a claim falls between the lines.

PHASE

# 03

## Mitigation, Technology & Safety Hardening

*Underwriting in 2026 is prospective, not retrospective. Documented technology, training, and equipment standards shift the conversation from an address to a managed, measurable risk.*

### WHAT TO DOCUMENT

- Video Telematics & AI Dash Cams**

Fleet-wide adoption of AI-enabled cameras (Motive, Samsara, Lytx, Netradyne) with documented coaching workflow for harsh braking, tailgating, and near-miss events. Sample driver safety scorecards and coaching logs.

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- Driver Credentialing**

Pre-hire screening with 3–7 year MVR lookback, zero-tolerance DUI/DWI policy, monthly OIG/LEIE exclusion checks, and ongoing PASS (Passenger Assistance, Safety, Sensitivity) and CTS (Certified Transport Specialist) training. Drivers age 25+ with two years livery or healthcare experience preferred.

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- Securement & Equipment**

4-point securement systems meeting WC18 / WC19 standards (Q'Straint, Sure-Lok), slip-resistant antimicrobial flooring, lift-deployment lockouts, and routine securement-equipment inspection records.

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- Maintenance & DVIRs**

Daily Vehicle Inspection Reports captured electronically, with at least 90 days of digital inspection history available, plus scheduled preventive maintenance records.

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- Dispatch & EVV**

Dispatch and scheduling platform (e.g., NEMT Cloud Dispatch) with Electronic Visit Verification — geofenced and timestamped trips that produce a digital audit trail for both insurance and Medicaid review.

#### WHY THIS MATTERS

*Pricing & eligibility*

Carriers actively reward operators who can demonstrate predictive, technology-driven safety. Telematics adoption can produce premium credit; documented securement standards and clean DVIRs unlock access to admitted markets. Without this evidence, the file often defaults to surplus-lines pricing — historically meaningfully higher than admitted equivalents.

PHASE

# 04

## Operational Portfolio & Layered Exposure

*High-value NEMT operations rarely sit on a single line of business. Reviewing the full portfolio together produces a stronger underwriting result and avoids fragmented coverage.*

### WHAT TO REVIEW

- Sexual Abuse & Molestation (SAM)**

Driver-passenger interaction policies, GPS tracking on all vehicles, and background screening that goes beyond standard criminal records. SAM is a frequent broker requirement and is excluded from most standard GL forms.

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- Cyber & HIPAA**

Cyber liability with HIPAA-aligned safeguards (MFA, encryption, VPN), Business Associate Agreements (BAAs) with dispatch and tech vendors handling PHI, and a written incident response plan.

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- Workers' Compensation**

Statutory coverage with documented return-to-work program, physical abilities testing for lifting roles, and class-code accuracy across drivers, dispatch, and admin staff.

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- Excess / Umbrella Liability**

\$5M to \$10M excess limits over auto and GL — increasingly considered a baseline defense against social inflation and nuclear verdict exposure for multi-passenger or high-acuity incidents.

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- Inland Marine & HNOA**

Inland marine for gurneys, wheelchairs, and medical equipment carried on vehicles. Hired & non-owned auto for admin or dispatch staff using personal vehicles for company business.

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- Ownership Structure**

Named insured aligned with the legal entity that owns the vehicles and holds broker contracts (LLC, corporation, family office). Mismatches are a common cause of claim denial and underwriting delay.

#### WHY THIS MATTERS

*A layered approach*

A fragmented program — different brokers for auto, GL, workers comp, and cyber — creates gaps in limits, coordination, and billing. Reviewing the full portfolio together lets the carrier see the total risk, apply multi-policy credits, and structure excess that actually attaches over the underlying limits.

PHASE

# 05

## Loss History, Safety Culture & Logistics

*A clean, well-organized submission improves your odds of a favorable quote in a market that has become increasingly selective. The narrative around prior losses matters as much as the loss runs themselves.*

### DOCUMENTS & QUESTIONS TO BE READY FOR

- 5-Year Loss Runs**      Currently valued loss runs (within 90 days) for auto, GL, professional, workers comp, and any specialty lines. Include "no loss" letters for years without claims.

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- Corrective Action Plans (CAPs)**      For any significant loss, a brief narrative explaining what happened, what was learned, and what training, equipment, or process changes were implemented to prevent recurrence.

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- Trigger & Timing**      What prompted this review — non-renewal, large premium increase, new broker contract, fleet expansion, or claim event — and target effective date with 60-90 days of lead time.

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- Operational Evidence**      Current MVRs (all drivers), training certifications, custom safety manual, vehicle photos (clear, four-elevation), and sample broker COIs and contracts.

### NEXT STEP

## Ready for your *NEMT coverage review?*

Send this checklist and your current declarations pages to our specialized NEMT advisory team. We coordinate the underwriting review across the leading NEMT carriers — including National Interstate, Lancer, and Tokio Marine — to position your operation for a competitive, contract-compliant program.

CALL DIRECT

**818.233.0825**

SEND DOCUMENTS

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