



March 4, 2022

Oregon Department of Human Services  
Vocational Rehabilitation  
Attention: Robin Brandt  
Policy Analyst  
500 Summer Street NE, E-87  
Salem, Oregon 97310-1018

**RE: OAR 582-070-0025**

Dear Ms. Brandt:

The National Mobility Equipment Dealers Association (“NMEDA”) is a non-profit trade association dedicated to expanding opportunities for people with disabilities to safely drive and/or be transported in vehicles modified with mobility equipment to fit their unique and specific needs. As the national trade association for the automotive mobility industry, NMEDA and its members possess distinct subject-matter expertise and have demonstrated a long-standing commitment to improving transportation options for individuals seeking to enhance their independence, mobility, and quality of life through automotive mobility solutions.

NMEDA’s mission is to promote, and to assist with the establishment and maintenance of, the highest quality and safest vehicle modification and adaptive equipment installation outcomes for the disabled driving community. With that mission in mind, NMEDA submits this comment in response to the Vocational Rehabilitation (“VR”) Program’s proposed changes to Oregon Administrative Rule 582-070-0025. The italicized quotations included in this comment refer to the proposed language changes published in the Notice of Proposed Rulemaking.

(a) *“ASE Certified Mechanic” means a mechanic who has fulfilled the voluntary requirements for certification by the U.S. National Institute for Automotive Excellence.*

VR is encouraged to consider more specific – and mobility-related – vendor selection criteria for individuals and/or businesses performing vehicle modifications and/or automotive mobility equipment installations for VR program participants. Please see the attached Best Practices document (*Recommended Practices for Driver Rehabilitation & Vehicle Modifications: Guidelines for Vocational Rehabilitation*) for additional information. Please also see the attached submissions from the California Department of Rehabilitation (CAVR), Georgia Vocational Rehabilitation Agency (GVRA), and North Carolina Vocational Rehabilitation Services (NCVR), three of over thirty states that require or strongly recommend Quality Assurance Program (QAP) accreditation for dealers providing services to VR program participants.

**National Mobility Equipment Dealers Association**

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- (b) *“Qualified Occupational Therapist” (QOT) means an individual with specialized training and experience to complete a qualified vehicle modification evaluation and must have at least one of the following current certifications:*
- a. *Occupational Therapy Credential/Licensed by Oregon (OTR/L);*
  - b. *Certified Driver Rehabilitation Specialist (CDRS);*
  - c. *Driver Rehabilitation Specialist – allied health specialist (DRS); or*
  - d. *Association for Driver Evaluation (ADED).*

As indicated during the March 1 Zoom hearing, the Association for Driver Rehabilitation Specialists (ADED) is seeking clarification regarding the above language. Please see the attached comment submission from ADED (*ADED Comment*) for clarification regarding the Association’s credentials.

*(e) The Program shall not approve funding for technologies considered experimental or unproven by the Federal Trade Commission’s Bureau of Consumer Protection; that lack National Mobility Equipment Dealers Association (NMEDA) approval; or that have not undergone crash testing.*

As indicated during the March 1 Zoom hearing, NMEDA reviews and accepts for compliance to certain Federal Motor Vehicle Safety Standards the vehicle conversions posted at [www.nmeda.org/consumer-resources/safety-reviewed-vehicles-components/safety-reviewed-vehicle-conversions/](http://www.nmeda.org/consumer-resources/safety-reviewed-vehicles-components/safety-reviewed-vehicle-conversions/). Safety-reviewed component parts are posted at [www.nmeda.org/consumer-resources/safety-reviewed-vehicles-components/safety-reviewed-components/](http://www.nmeda.org/consumer-resources/safety-reviewed-vehicles-components/safety-reviewed-components/).

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NMEDA appreciates the opportunity to comment on the proposed changes to Oregon Administrative Rule 582-070-0025. This information is submitted with the intent of improving program participants’ experiences with – and Oregon VR’s delivery of – driver rehabilitation, vehicle modification, and related services. We hope to function as both a resource and a partner moving forward.

Thank you for your consideration.



Amy Schoppman  
Director of Government Relations  
National Mobility Equipment Dealers Association