



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120
<http://www.puc.pa.gov>

December 10, 2025

A-6428469
A-2025-3059020

GUARDIAN NEMT LLC
1558 WELSH ROAD
LANSDALE PA 19446

RE: Application of Guardian NEMT LLC

To Whom It May Concern:

On December 2, 2025, the application of Guardian NEMT LLC, at A-2025-3059020, as a motor carrier was accepted for filing and docketed with the Public Utility Commission. In order for the Commission to proceed with the application, additional information is required.

Please forward the information to the Secretary of the Commission at the following address **within ten (10) working days** from the date of this letter.

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

ALL Parties to proceedings pending before the Commission are advised to open and use an e-filing account through the Commission's website, OR you may submit your filing by mail. If a filing contains confidential or proprietary material, the filing is required to be submitted by overnight delivery.

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, Edward Garbrah, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

Failure to comply with this request within 10 working days from the date of this letter will result in the denial of the application.

Please direct any questions to David Canzoneri, Bureau of Technical Utility Services at (717) 346-9738. Faxed or emailed filings are **not** accepted.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure

Docket No. A-2025-3059020
Guardian NEMT LLC

Request for Information

- 1.) You failed to adequately answer all aspects of question #5 of the Verified Statement of Applicant. **Please review Title 52 Pa Code §29.501-509 Driver Regulations to see what is required of motor carriers.**
 - a. Your system for conducting criminal background checks; **(Title 52 Pa Code §29.505 – Criminal History)**
 - i. You failed to answer what type of things in a prospective driver’s criminal background check would disqualify them from employment? Please provide a policy that complies with the regulation found at Title 52 Pa Code §29.505(a)(3).
 - ii. You failed to answer how you will maintain records (record retention) of the criminal background checks performed? Please provide a policy that complies with the regulations found at Title 52 Pa Code §29.505(a)(4).
 - b. Your system for conducting driver license/history checks; **(Title 52 Pa Code §29.504 – Driver History)**
 - i. You failed to answer how driver license/history checks be performed?
 - ii. You failed to answer how you will maintain records (record retention) of such checks? Please provide a policy that complies with the regulations found at Title 52 Pa Code §29.504(a)(3).

PLEASE PROVIDED A THOROUGH TYPED RESPONSE TO THESE QUESTIONS ON A SEPARATE SHEET OF PAPER

Guardian NEMT, LLC

December 10, 2025

Docket No. A-2025-3059020

Response to Request for Information

Driver Regulations Compliance Policies

a. System for Conducting Criminal Background Checks

(52 Pa. Code §29.505 – Criminal History)

i. Disqualifying Criminal History (Compliant with §29.505(a)(3))

Guardian NEMT, LLC will maintain a written criminal background check policy that complies with 52 Pa. Code §29.505. A criminal background check will be conducted before hiring and every two years thereafter. The following criminal offenses automatically disqualify an individual from employment as a driver:

1. Any sexual offense, including but not limited to rape, sexual assault, indecent exposure, or any offense requiring registration under Megan's Law.
2. Any violent felony or misdemeanor, including assault, aggravated assault, kidnapping, robbery, homicide-related offenses, or any crime involving physical harm or the threat of harm to another person.
3. Any offense involving fraud, theft, forgery, burglary, identity theft, or financial exploitation within the past seven (7) years.
4. Any DUI/DWI conviction within the past seven (7) years, or multiple DUI/DWI convictions at any time.
5. Any offense involving the illegal use, sale, manufacture, or distribution of controlled substances within the past seven (7) years.
6. Any offense involving endangering the welfare of children, the elderly, or individuals with disabilities.
7. Any offense that, in the judgment of management, demonstrates that the applicant may pose a safety risk to passengers, especially passengers who are elderly, mobility-impaired, or medically fragile.

If a background check reveals any disqualifying offense, the applicant will not be hired nor permitted to operate vehicles for the company.

This policy fully complies with 52 Pa. Code §29.505(a)(3) regarding the evaluation and disqualification of criminal history.

ii. Record Maintenance for Criminal Background Checks (Compliant with §29.505(a)(4))

Guardian NEMT, LLC will maintain a record-retention system compliant with 52 Pa. Code §29.505(a)(4). The following procedures apply:

1. All criminal background checks will be stored in a secure, password-protected digital file system, accessible only to authorized management personnel.
2. Paper copies, if generated, will be stored in a locked filing cabinet in a restricted-access office.
3. Records will be retained for a minimum of three (3) years after the driver's employment ends, as required.
4. Each file will include:
 - The completed background check results
 - The date of review
 - The name of the reviewer
 - A signed acknowledgment that the review was performed in accordance with §29.505
5. Records will be available for inspection by the Pennsylvania Public Utility Commission upon request.

This process ensures continuous compliance with 52 Pa. Code §29.505(a)(4).

b. System for Conducting Driver License / Driver History Checks

(52 Pa. Code §29.504 – Driver History)

i. How Driver License / Driver History Checks Will Be Performed

Guardian NEMT, LLC implements the following procedures in full compliance with 52 Pa. Code §29.504:

1. Pre-employment:

- We obtain a PennDOT Driver History Record (MVR) for every applicant.
- The MVR is reviewed for suspensions, revocations, moving violations, DUI/DWI history, and accident history.

2. Ongoing Monitoring:

- Driver history checks are repeated annually for every driver.
- Additional checks are performed immediately if we receive reports of unsafe driving, accidents, or violations.

3. Disqualifying driving history includes:

- Any license suspension or revocation within the past three (3) years
- Three (3) or more moving violations within the past 24 months
- Any DUI/DWI conviction within the past seven (7) years
- Hit and run, reckless driving, or vehicular assault
- Repeated at-fault accidents or any history suggesting unsafe driving or inability to transport vulnerable passengers safely

Only applicants and drivers who meet safe-driving standards and maintain a valid driver's license will be permitted to operate company vehicles.

ii. Record Maintenance for License/History Checks (Compliant with §29.504(a)(3))

To comply with 52 Pa. Code §29.504(a)(3), the following record-retention policy is in place:

1. All MVR and license-check documentation will be stored securely in digital driver files, with backups maintained.
2. Paper files, if used, will be stored in a locked, restricted-access filing system.
3. Records will be retained for at least three (3) years, including:
 - The full Motor Vehicle Record
 - The date the record was obtained
 - Name of the manager who reviewed it

- Notes regarding compliance with §29.504

4. Records will be immediately available to the PA PUC for inspection upon request.

This satisfies the record-keeping requirements of §29.504(a)(3).