



June 10, 2025

Senator Pavel Payano, Chair
Joint Committee on Consumer Protection
& Professional Licensure
State House, Room 413-B
Boston, MA 02133

Representative Tackey Chan, Chair
Joint Committee on Consumer Protection
& Professional Licensure
State House, Room 42
Boston, MA 02133

RE: April 29th Joint Committee on Consumer Protection & Professional Licensure Legislative Hearing – Wheelchair Repair (H1278 and S210)

Dear Chair Payano and Chair Chan,

On behalf of the Massachusetts Association of Health Plans and our 13 member health plans and one behavioral health organization, providing health insurance coverage to nearly 3 million Massachusetts residents, we appreciate the opportunity to share feedback on the following bills before your Committee that will raise costs for small businesses and their employees. Health care affordability is the number one challenge facing individuals and small businesses in this state, driven by ever-increasing prices for prescription drugs, hospitals and providers. Without action to address the key cost drivers, the Commonwealth cannot make health care more affordable.

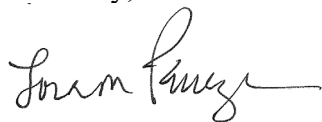
MAHP member plans are deeply committed to meeting the health care needs of their members. This includes robust coverage for the purchase, rental, and repairs of medically necessary Durable Medical Equipment (DME), like wheelchairs. In some cases, prior authorization is required and is used to ensure that the repair is clinically appropriate, that the equipment is still suitable and safe for member use, and that the equipment is not beyond its useful life and should not be replaced instead. Prior authorization also helps prevent unnecessary or excessive repairs and ensures that the repairs are more cost-effective for the consumer than replacement. Finally, prior authorization verifies that the repair provider is licensed and in-network, that the vendor is using safe and appropriate parts and that the repair complies with manufacturer standards. Prior authorization for wheelchair repairs is not a barrier to care; rather, it is a particularly important clinical and financial safeguard for high-cost repairs or repairs involving complex power wheelchairs.

As such, we are concerned with provisions in House Bill 1278, *An Act relative to wheelchair repair requirements and consumer protection*, which would eliminate health plans' ability to conduct prior authorization for all wheelchair repairs. While we understand the desire to reduce delays for wheelchair users, especially for minor repairs, we caution against an outright ban on prior authorization. According to publicly available data, the median cost of wheelchair repairs is approximately \$150, with typical out-of-pocket repair costs ranging between \$50 and \$620. Given this, a more balanced policy would be to prohibit prior authorization only for repairs costing less than \$1,000, consistent with existing MassHealth policy and as envisioned in Senate Bill 210, *An Act expanding wheelchair warranty protections for consumers with disabilities*.

At a time when health care costs are rising at an unsustainable pace, straining employers, consumers, and the state budget, legislation that increases health care spending – by eliminating prior authorization altogether - is the antithesis of affordability. We urge the Committee to take a more thoughtful approach that balances timely access to repairs with needed clinical and financial oversight.

Thank you for the opportunity to share our concerns. Please do not hesitate to contact me for additional information or to discuss these bills further.

Sincerely,

A handwritten signature in black ink, appearing to read "Lora M. Pellegrini", with a long horizontal flourish extending to the right.

Lora M. Pellegrini, President and CEO
Massachusetts Association of Health Plans