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Date: January 30, 2024

To the Honorable Members of the Oregon Senate Committee on Health Care:

Subject: Support for Oregon Senate Bill 549

Dear Senators,

I am writing to express strong support for Oregon Senate Bill 549, on behalf of Medicaid recipients in the state of Oregon. The bill seeks to prohibit the Oregon Health Authority (OHA) and coordinated care organizations (CCOs) from requiring prior authorization for the repair of complex rehabilitation technology (CRT). This bill is crucial for ensuring the safety, mobility, independence and function of individuals who rely on CRT for their daily activities.

Norco is a provider of CRT equipment and service/ repair to many Medicaid recipients throughout the state of Oregon. The current burden of submitting for authorization creates delay in servicing and repairing necessary equipment. Currently, when a piece of equipment breaks down (ie: power wheelchair stops working (driving/ moving) or seating stops tilting (providing pressure relief)) the Medicaid recipient would contact Norco for evaluation. Our technician would be scheduled to assess the equipment and obtain quotes from the manufacturer. Norco then works to obtain required documentation from the physician.

OHA policy requires that if a component is not assigned an appropriate code and has a MSRP over \$150.00- a request must be submitted and verified by a 3rd party reviewer for PDAC coding verification. The agency has reported to be understaffed, not set up to handle this requirement by state Medicaid and follows CMS coding guidelines for Medicare- not Medicaid. This requirement is not required by any other state Medicaid program. This review can take the 3rd part agency 1-3 weeks depending on demand.

Once the above review is completed, and the item is PDAC verified and confirmed, Norco can then submit for authorization. The state review time can vary. Once authorization is received, we can then order the parts and, once received from the manufacturer, the technician is scheduled to complete the repair. Many of the parts are costly and highly custom to each manufacturer, piece of equipment, and serial number so they can not be stocked locally.

Requiring prior authorization for CRT repairs creates unnecessary delays, putting recipients at significant safety risks. These delays result in prolonged periods where individuals are unable to use their equipment, leading to increased vulnerability to accidents and injuries. CRT is not a convenience but a necessity for performing basic tasks and maintaining independence. Any delay in repair can severely impact quality of life and overall well-being.

This bill would eliminate this delay. Without having to submit for authorization, simple repairs of basic/ stock equipment such as replacement of tubes, tires, and batteries could occur as quickly as the same day. Parts like motors, actuators, and joysticks could be ordered on the same day of the complaint or technician evaluation.

Given that most authorization requests are approved, the delay caused by the prior authorization process is unnecessary and burdensome.

The impact of these delays goes beyond personal safety and mobility. Individuals who rely on CRT use it to function independently in their daily lives, including going to work, medical appointments, family management tasks and completing essential activities of daily living. Without timely repairs for critical components such as batteries, tires, motors, actuators, and other components, these individuals are unable to commute to their jobs, resulting in lost wages and decreased productivity. Additionally, their ability to perform basic tasks such as personal care, cooking, and household chores may be compromised, leading to further frustration and dependency.

Delays in CRT repairs also create significant challenges for family management and caregiving. Many CRT users have children or other family members who depend on them. When their equipment is out of service, they may be unable to perform essential caregiving tasks, placing additional strain on their families. The need for a timely repair is crucial to maintaining a stable and supportive family environment.

Furthermore, most individuals do not have backup equipment to use while waiting for repairs. This can result in being confined to bed or experiencing severe limitations in mobility, making it difficult to manage daily life. Additionally, the availability of replacement parts can be further delayed due to manufacturer shipping times and the fact that suppliers often do not stock specialized components. These supply chain issues only exacerbate the problem, prolonging the time individuals must wait for necessary repairs.

Without the use of CRT, there is a significant risk of injury, pressure wounds, and other medical complications, including hospitalization or even death. In the case of non-functioning actuators or electronics, individuals are at increased risk of developing pressure sores due to prolonged immobility. Providing loaner equipment is not a possibility, as CRT users require highly customized components and fitting of their equipment to be safe, independent, and functional. In the case of power mobility, there is often specialty drive controls and programming that cannot be transferred to a loaner piece of equipment during the 4-6 week repair timeframe.

By eliminating the need for prior authorization, SB 549 will streamline the repair process, ensuring that individuals receive timely repairs and can continue to use their equipment safely and effectively. This change will not only enhance the safety, independent and mobility of CRT users but also reduce the administrative burden on both the users and the healthcare system.

In conclusion, I urge you to support Oregon Senate Bill 549 and help ensure that individuals who rely on complex rehabilitation technology can access timely repairs without unnecessary delays. This bill is a step towards a more inclusive and supportive healthcare system that prioritizes the safety and well-being of all its users.

If you have any questions, please do not hesitate to contact me at 208-336-1643 or email, scotti@norco-inc.com

Thank you for your consideration.

Sincerely,

Scott Ingraham, ATP Director, Complex Mobility