



Date: February 4, 2025

To: Chairwoman Sollman- Senate Energy and Environment Committee

RE: Opposed as written- SB 550- Right to Repair Power Wheelchairs & Complex Rehab Technology

Dear Chairwoman, Sollman:

On behalf of the International Registry of Rehabilitation Technology Suppliers (iNRRTS), we respectfully write in opposition as written of SB 550— Right to Repair Wheelchairs. We oppose the bill as written, as it may unintentionally harm complex rehab patients.

iNRRTS is an international not-for-profit organization dedicated to the support, advancement, and education of professional Suppliers of CRT, which includes medically necessary customized manual and power wheelchairs, seating and positioning systems, and other adaptive equipment critical to a small and fragile population of children and adults with severe physical disabilities such as spinal cord injury, traumatic brain injury, cerebral palsy, ALS, multiple sclerosis, and spina bifida. This small subset of products is subject to strict prior authorization. It is individually configured by a team of physicians, clinicians, and appropriately credentialed Suppliers to fit the unique needs of one specific individual. The CRT evaluation, provision, and ongoing support processes are labor intensive, requiring credentialed staff and focused operational infrastructures.

Access to wheelchair repairs is critical to maintaining the health, safety, and independence of individuals with disabilities. In recent years, consumers have experienced delayed access and fewer provider options when equipment service or repair is needed. As drafted, SB 550 will not address the current challenges in providing repairs while simultaneously exposing CRT patients to serious health risks due to improper repairs or clinical parts being purchased without the proper joint evaluation by a CRT Supplier and a clinician. To this end, we would like to provide the following information for your consideration:

Unintended patient risk under HB SB 550—As currently written, this legislation would create additional risks for people with disabilities who rely on CRT power wheelchairs.

CRT power wheelchairs are prescribed by physicians and individually configured under clinical guidance from medical professionals (physical and occupational therapists) and an iNRRTS-Certified Complex Rehab Technology Supplier (CRTS®) employed by the provider. Adjustments or repairs to such equipment can significantly impact the wheelchair user's positioning and safety.



Even small maladjustments can affect the person's respiratory function, digestive function, circulatory function, functional postural support, and necessary skin pressure relief.

We believe in the importance of consumer choice and respect that some individuals wish to repair their wheelchairs independently of their wheelchair provider. These repairs can be dangerous if performed by someone without proper training; however, those who wish to seek services outside of the manufacturer's dealer network can carry out some basic adjustments and repairs safely. Therefore, ***language is needed to ensure self-repair only applies to non-clinical, non-positioning, and non-programmable items. iNRRTS has partnered with various industry stakeholders and consumer groups to pass this language in Tennessee, and we are working in other states to introduce this legislation utilizing this consumer-agreed-upon language.***

iNRRTS and our members remain committed to collaborating on policy improvements that all stakeholders can support, and that will help patients with safe, quicker service and repairs. Our suggestion would strike the appropriate balance between allowing self-repair and improving access for sensitive clinical repairs while maintaining patient safety. We strongly urge further discussion to reach an agreement among all parties and welcome the opportunity to discuss our concerns and recommendations further.

Thank you for your attention to this matter; if you have any questions, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Andrea Madsen, ATP'. The signature is written in a cursive, flowing style.

Andrea Madsen, ATP

Executive Director

International Registry of Rehabilitation Technology Suppliers (iNRRTS)

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