

**Office of Medicaid
BOARD OF HEARINGS**

Appellant Name and Address:



Appeal Decision:	Denied	Appeal Number:	2518262
Decision Date:	02/27/2026	Hearing Date:	01/15/2026
Hearing Officer:	Mariah Burns		

Appearance for Appellant:



Appearance for MassHealth:

Kelly Rayen, RN, Clinical Appeals Reviewer for
Optum



*The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Office of Medicaid
Board of Hearings
100 Hancock Street, Quincy, Massachusetts 02171*

APPEAL DECISION

Appeal Decision:	Denied	Issue:	Prior Authorization; Personal Care Attendant Services
Decision Date:	02/27/2026	Hearing Date:	01/15/2026
MassHealth's Rep.:	Kelly Rayen, RN	Appellant's Rep.:	[REDACTED]
Hearing Location:	Telephone (Quincy)	Aid Pending:	No

Authority

This hearing was conducted pursuant to Massachusetts General Laws Chapter 118E, Chapter 30A, and the rules and regulations promulgated thereunder.

Jurisdiction

Through a notice dated November 11, 2025, MassHealth denied the appellant's prior authorization request for personal care attendant (PCA) services because MassHealth determined that the appellant does not need assistance with two or more Activities of Daily Living (ADLs). *See* 130 CMR 422.403(C)(3) and Exhibit 1. The appellant filed this appeal in a timely manner on December 11, 2025. *See* 130 CMR 610.015(B) and Exhibit 2. Denial of assistance is valid grounds for appeal. *See* 130 CMR 610.032.

Action Taken by MassHealth

MassHealth denied the appellant's prior authorization request for personal care attendant services.

Issue

The appeal issue is whether MassHealth was correct in determining that the appellant does not require hands-on assistance with two or more Activities of Daily Living, disqualifying her from the

MassHealth PCA program.

Summary of Evidence

The appellant is an adult MassHealth member over the age of 65. She was assisted at the hearing by a family member. MassHealth was represented by a registered nurse and clinical appeals reviewer for Optum, which manages MassHealth's PCA program. All parties appeared at the hearing by telephone. The following is a summary of the testimony and evidence submitted at the hearing.

On or about November 3, 2025, the appellant submitted a prior authorization request for initial implementation of PCA services through her personal care management (PCM) agency, [REDACTED] requesting 17 hours and 15 minutes of weekly PCA assistance. On November 11, 2025, MassHealth denied the request after finding that the appellant does not require the necessary assistance with two or more Activities of Daily Living (ADLs). The appellant filed a timely request for fair hearing on December 11, 2025.

The appellant requested assistance with bathing, grooming (nail care, hair care, and lotion application), dressing/undressing, and bowel care, all of which MassHealth considers to be ADLs. She also requested assistance with IADLs, but those needs are not considered in an initial PCA evaluation. The appellant suffers from a number of ailments including, but not limited to, [REDACTED]

[REDACTED] The appellant's PCM agency conducted an Occupational Therapy (OT) Functional Status Evaluation prior to applying for PCA benefits. It states that the appellant's chronic conditions impact her ability to balance, bend, grasp with her right hand, reach with her right arm, and squat. The report also indicates that the appellant would benefit from use of a shower chair.

At the hearing, the appellant testified that she has not recently received OT or physical therapy treatment to help improve her symptoms. She explained that it is difficult for her to hold nail clippers or wipe herself after using the bathroom, that she can hold a hairbrush for short periods, and she can only apply lotion to her arms and front, but not her legs or back. She reported that she has never tried to use adaptive aids beyond grab bars in her shower. She expressed concern that a shower chair would not fit in her bathtub.

The MassHealth representative testified that the appellant's prior authorization request was denied not because the appellant does not require assistance with these tasks, but because there are less expensive alternatives to PCA services that the appellant has not explored. Specifically, she stated that the appellant's ability to use her hands and upper extremities, evidenced by her ability to use a walking aid and brush her teeth, indicates that there is room for symptom improvement with treatment. She stated that the appellant could use a shower chair and extended cleaning tool to bathe herself, dressing aids to assist her with donning and removing

clothing, and a toilet aid to assist with wiping. Furthermore, she testified that OT can teach strategies on how to bathe, groom, dress, and use the bathroom with independence. These adaptive aids and therapies are typically covered by MassHealth. Without evidence that those strategies have failed, the MassHealth representative explained that the appellant has not demonstrated that PCA assistance is the appropriate and least costly option to assist the appellant with her ADLs.

Findings of Fact

Based on a preponderance of the evidence, I find the following:

1. The appellant is a MassHealth member over the age of 65 who lives in the community. Exhibit 4.
2. On November 3, 2025, [REDACTED], a PCM agency, submitted a prior authorization request on the appellant's behalf for 17 hours and 15 minutes of weekly PCA services. The request specifically indicated that the appellant requires assistance with bathing, dressing/undressing, grooming (nail care, hair care, and lotion application), and bowel care. Testimony, Exhibit 5.
3. On November 11, 2025, MassHealth denied the request after finding that the appellant does not require hands-on assistance with two or more Activities of Daily Living (ADLs). Exhibit 1.
4. The appellant filed a timely request for fair hearing on December 11, 2025. Exhibit 2
5. The appellant's chronic health conditions impact her ability to balance, bend, grasp with her right hand, reach with her right arm, and squat. Exhibit 5 at 21. She utilizes grab bars in her shower but has not received OT or physical therapy and has not attempted to use other adaptive aids covered by MassHealth to manage her needs. *Id.*, Testimony.

Analysis and Conclusions of Law

MassHealth requires providers to obtain prior authorization before administering certain medical services. 130 CMR 450.303 and 130 CMR 420.410. PCA services fall into this category, and the regulations governing prior authorization for such services are found at 130 CMR 422 et seq. MassHealth will authorize coverage of PCA services when:

- (1) The PCA services are authorized for the member in accordance with 130 CMR 422.416.
- (2) The member's disability is permanent or chronic in nature and impairs the member's functional ability to perform [Activities of Daily Living (ADLs)] and

[Instrumental Activities of Daily Living (IADLs)] without physical assistance.¹

(3) The member, as determined by the PCM agency, requires physical assistance with two or more of the ADLs as defined in 130 CMR 422.410(A).

(4) The MassHealth agency has determined that the PCA services are medically necessary.

130 CMR 422.403 (C). ADLs are defined at 130 CMR 422.410(1) as follows:

(A) Activities of Daily Living (ADLs). Activities of daily living include the following categories of activities. Any number of activities within one category of activity is counted as one ADL

(1) mobility: physically assisting a member who has a mobility impairment that prevents unassisted transferring, walking, or use of prescribed durable medical equipment;

(2) assistance with medications or other health-related needs: physically assisting a member to take medications prescribed by a physician that otherwise would be self-administered;

(3) bathing or grooming: physically assisting a member with bathing, personal hygiene, or grooming;

(4) dressing: physically assisting a member to dress or undress;

(5) passive range-of-motion exercises: physically assisting a member to perform range-of motion exercises;

(6) eating: physically assisting a member to eat. This can include assistance with tube-feeding and special nutritional and dietary needs; and

(7) toileting: physically assisting a member with bowel or bladder needs.

in addition to meeting those categorical criteria, all PCA services must be medically necessary for prior authorization to be approved. A service is determined to be medically necessary if:

(1) it is reasonably calculated to prevent, diagnose, prevent the worsening of, alleviate, correct, or cure conditions in the member that endanger life, cause suffering or pain, cause physical deformity or malfunction, threaten to cause or to aggravate a handicap, or result in illness or infirmity; and

(2) there is no other medical service or site of service, comparable in effect, available, and suitable for the member requesting the service, that is more conservative or less costly to the MassHealth agency. Services that are less costly to the MassHealth agency include, but are not limited to, health care

¹ ADLs include assistance with mobility, medications, bathing or grooming, dressing or undressing, passive range of motion, and toileting, while IADLs include household services (such as laundry, shopping, and housekeeping), meal preparation and clean-up, transportation, and other special needs codified in the regulations. 130 CMR 422.410(A) and (B).

reasonably known by the provider, or identified by the MassHealth agency pursuant to a prior-authorization request, to be available to the member through sources described in 130 CMR 450.317(C), 503.007...

...Medically necessary services must be of a quality that meets professionally recognized standards of health care, and must be substantiated by records including evidence of such medical necessity and quality.

130 CMR 450.204(A)-(B). An appellant bears the burden of proof at fair hearings “to demonstrate the invalidity of the administrative determination.” *Andrews v. Division of Medical Assistance*, 68 Mass. App. Ct. 228, 231 (2006). The fair hearing decision, established by a preponderance of evidence, is based upon “evidence, testimony, materials, and legal rules, presented at hearing, including the MassHealth agency’s interpretation of its rules, policies and regulations.” 130 CMR 610.085(A).

In this case, the appellant contends that she requires PCA assistance with four Activities of Daily Living: bathing, grooming, dressing/undressing, and bowel care. Although she credibly reports that she is unable to perform these activities without some kind of assistance, she has not received occupational therapy that would a) recommend adaptive aids such as a shower chair, dressing tools, and sanitary wipes that would be less costly alternatives to PCA assistance, b) teach the appellant how to perform these activities on her own, and/or c) determine that the appellant’s needs are beyond the assistance that adaptive aids can provide. Where such an assessment has not been completed, and where the OT assessment conducted in support of this prior authorization request indicates that adaptive aids would be useful for the appellant, I find that the appellant has not demonstrated that she meets the medical necessity criteria for PCA assistance, namely, that she requires hands-on assistance with two or more ADLs. Additionally, there are less costly alternatives that may assist the appellant in living independently that have not been ruled out. Therefore, I find no error with MassHealth’s decision to deny the appellant’s prior authorization request for PCA services.

For the foregoing reasons, the appeal is hereby DENIED.

Order for MassHealth

None.

Notification of Your Right to Appeal to Court

If you disagree with this decision, you have the right to appeal to court in accordance with Chapter 30A of the Massachusetts General Laws. To appeal, you must file a complaint with the Superior Court for the county where you reside, or Suffolk County Superior Court, within 30 days of your receipt of this decision.

Mariah Burns
Hearing Officer
Board of Hearings

MassHealth Representative: Optum MassHealth LTSS, P.O. Box 159108, Boston, MA 02215