

To whom it may concern;

The Stavros Center for Independent Living works closely with The Massachusetts Rehabilitation Commission's Home Modification Program. This program is a deferred loan at a low interest rate for homeowners with disabilities. The modifications are meant to increase home accessibility in order to make the environment as barrier free as possible. The maximum loan is \$30,000.

In some cases constructing a ramp into someone's home is technically infeasible and in those cases the homeowner has no choice except to install a platform lift to gain access to his/her home. This installation of a residential platform lift currently requires a licensed elevator installer, as well as a structural engineer to sign off on the pad. It then needs to be inspected by a licensed elevator inspector and then inspected every 5 years at additional cost. Considering the lack of licensed elevator inspectors in the state and the costs of the platform lift, Stavros recommends using someone other than a licensed elevator installer to certify the installation. For example, this person could be a certified inspector or town inspector with platform lift certification training.

A platform lift is not nearly as complicated as an elevator, is more like an appliance and doesn't require an elevator shaft. These additional requirements drive up the costs of modification for the homeowner. It also drives up the costs for the total modification. Currently The Home Modification loan program has a cap of \$30,000 which with the new Stretch Laws and the Lead Remediation and licensing is not an adequate amount to address other access issues within the home. Typically homeowners with disabilities who require access into the home also require, at a minimum, bathroom modifications. Between the inflated costs of the platform lift and the costs of an accessible bathroom \$30,000 simply is not enough. We recommend the funding cap be raised to \$40,000. We also recommend eliminating the need for a licensed elevator installer as well as a structural engineer.

Other changes in the law could be;

1. No permit required or at least no cost for it.
2. No tax for cost of lift.
3. No inspection cost.

In addition The Home Modification Loan Program also requires all contractors to be lead certified. The lead certification, in most cases, is unnecessary and if required for the job, most contractors will just higher a sub-contractor who is licensed anyway. Any home built after 1978 does not require lead inspection.

Finding a lead certified contractor is more difficult and thins the field for otherwise good quality small contractors to participate in the Home Mod Program. Getting these certifications is time consuming and expensive for the contractor and he/she may rarely or ever need it... The homeowner is trying to make the loan program's money stretch as far as possible. These additional costs drive up the expenses for the state and the homeowner gets fewer modifications but spends more money. This was not the intention of the Home Modification Loan Program.

Furthermore The Home Modification Loan Program's required documentation would best serve the homeowner if it was more streamlined and the waiting period for the contractor to be reimbursed was shortened. Contractors are often waiting months for payment to start the job and complete it. This makes it more difficult for contractors to pay themselves and the subcontractors. The onerous paperwork as well as the delayed payments adds to the difficulty of finding a smaller experienced and qualified contractor. This leaves the field open to larger contractors with deep pockets that have expensive overhead costs. Again in these cases the homeowner gets less for his/her money as the contractor does less work.

We hope you can make these regulatory changes. We believe these changes will make the Home Modification Loan Program more user-friendly, more economical, reduce state resources and create better results for the constituency the program was designed for.