Alliance of Nurses for Healthy Environments
Bringing Science and Passion to the Environmental Health Movement

March 4, 2025

Support: LD 582 - An Act to Require Health Insurance Carriers to Provide Coverage for Blood Testing for Perfluoroalkyl and Polyfluoroalkyl Substances

The Alliance of Nurses for Healthy Environments (ANHE) appreciates the opportunity to support LD 582.[1] With nurse members in all 50 states, including Maine, ANHE is the only national nursing organization focused solely on the intersection of health and the environment.

Nurses consistently see evidence of the health harms of toxic environmental exposures in our everyday work and are often the "eyes and ears" of the care teams in which we work. The ubiquitous nature of PFAS contamination underscores the need to curb all pathways of PFAS exposure and sources of pollution. Children, low income communities, communities of color, tribal, and rural communities are disproportionately impacted and more susceptible to the health impacts of PFAS contamination.

PFAS are associated with health outcomes including:

- decreased antibody responses (in adults and children),
- dyslipidemia (in adults and children),
- decreased infant and fetal growth, and
- increased risk of kidney cancer (in adults) [2]

Determining treatment for PFAS exposure begins with assessing a patient's level of exposure including a patient history and blood tests. Blood serum tests are a necessary part of assessing a patient's level of current PFAS exposure. However, these tests frequently remain uncovered by insurance plans. Many private Maine insurers leave patients to cover the full cost of the blood serum test unless the deductible has been reached. The $600 per person cost of the serum test currently prevents PFAS impacted Mainers from assessing their exposure.

Neighboring states like New Hampshire have already required that health insurers cover PFAS blood testing.[3,4,5] The blood serum test for PFAS provides an assessment of

[1] 132nd Maine Legislature. *An Act to Require Health Insurance Carriers to Provide Coverage for Blood Testing for Perfluoroalkyl and Polyfluoroalkyl Substances.* https://legislature.maine.gov/backend/App/services/getDocument.aspx?documentId=110344

[2] National Academies of Sciences, Engineering, and Medicine (NASEM). (2022). *Guidance on PFAS Exposure, Testing, and Clinical Follow-Up*. The National Academies Press. https://doi.org/10.17226/26156.

[3] New Hampshire Insurance Department. PFAS FAQs: The purpose of this FAQ is to provide consumers with information regarding insurance coverage of medical testing for Per- and Polyfluoroalkyl Substances (PFAS). https://www.insurance.nh.gov/pfas-faqs#:~:text=PFAS%20testing%20is%20required%20to,both%20individual%20and%20group%20markets.

[4] Anthem. (March 1, 2021). Coverage for PFAS and PFC blood tests for New Hampshire residents. *Provider news, New Hampshire*. https://providernews.anthem.com/new-hampshire/articles/coverage-for-pfas-and-pfc-blood-tests-for-new-hampshire-residents-7061

[5] General Court of New Hampshire. (2020). HB 1264: *extending the commission on the seacoast cancer cluster investigation, setting the maximum contaminant levels for certain perfluorochemicals in drinking water, establishing a per and polyfluoroalkyl substances fund and programs and making an appropriation therefor, requiring insurance coverage for PFAS and PFC blood tests, and expanding the statute governing ambient groundwater quality standards.* https://gc.nh.gov/bill_status/legacy/bs2016/bill_status.aspx?lsr=2641&sy=2020&sortoption=billnumber&txtsessionyear=2020&txtbillnumber=HB1264

current exposure and can help impacted families make lifestyle changes to prevent future exposure. The inability to order requested and medically indicated tests is a huge barrier for clinicians in practice and patients in the community.

This legislation, LD 532, is not a new mandate, rather it only clarifies an existing mandate. Under current state and federal law, insurers must cover the full cost of a list of 10 Essential Health Benefits including preventative health care and chronic disease management. The PFAS blood serum test is essential to accessing both preventative care and chronic disease management since it allows clinicians to identify and manage risk. High levels of PFAS exposure reinforce the importance of regular screening, allowing for early detection and treatment of PFAS linked diseases.

The National Academy of Sciences Engineering and Medicine (NASEM) recommends PFAS blood serum tests for at-risk populations including communities with documented exposure, people living near farms where sludge may have been spread, people with an occupational exposure risk including firefighters & people living near landfills, incinerators, airports, and military bases.[6]

In Maine, the following exposure areas have been identified:

- at least 82 farms with documented PFAS contamination [7]
- PFAS levels above the state's interim safe drinking water standard were found in over 600 private drinking wells [8]
- at least 25 of Maine's schools and daycare facilities had water supplies above Maine's interim drinking water standard of 20 parts per trillion [9] (suggesting that 6,650 children and young adults currently enrolled at those schools have been exposed to high levels of PFAS while at school)
- 43 impacted schools [10,11] with a total of 9,550 children exposed to drinking water above the Environmental Protection Agency's (EPA) draft drinking water standards. The EPA's drinking water standards are lower than Maine's regulatory requirements for PFAS. While the total number of people previously exposed from these impacted schools would be hard to calculate, the elevated levels of PFAS in drinking water

[6] See citation 2 (NASEM, 2022).
[7] Miller, K. (January 22, 2025). State officials report progress, challenges identifying PFAS on farms as testing continues. *Maine Public.* https://www.mainepublic.org/health/2025-01-22/state-officials-report-progress-challenges-identifying-pfas-on-farms-as-testing-continues
[8] Overton, P. (June 17, 2024). Hundreds of Maine households are stranded in PFAS limbo. *Portland Press Herald.* https://www.pressherald.com/2024/06/16/about-500-stranded-in-forever-chemical-limbo-but-may-not-even-know-it/#:~:text=The%20state's%20sludge%20investigation%2C%20which%20began%20in,above%20the%20EPA's%20new%204%2D4%2D10%20ppt%20limit.

[9] Defend Our Health. (January 17, 2023). Defend Our Health discovers more than 6,500 Maine school children exposed to PFAS. https://defendourhealth.org/news/defend-our-health-discovers-more-than-6500-maine-school-children-exposed-to-pfas/#:~:text=According%20to%20the%20newly%20reported%20data%20from,total%2C%206%2C650%20currently%20enrolled%20children%20and%20young
[10] Maine Senate Democrats. (March 28, 2023). Sen. Brenner introduces legislation to expand health care coverage for PFAS blood testing. https://www.mainesenate.org/sen-brenner-introduces-legislation-to-expand-health-care-coverage-for-pfas-blood-testing/
[11] Maine Department of Health and Human Services. (2023). PFAS Compounds in parts per trillion (ppt). Maine Public Water Systems https://www.maine.gov/dhhs/mecdc/environmental-health/dwp/cet/documents/pfasResults.pdf

warrants supporting clinicians and patients with the capacity to order insurance-covered blood serum tests for PFAS with as few barriers as possible.

The need for blood testing for PFAS is clear. The Alliance of Nurses for Healthy Environments (ANHE) urges the Maine legislature to require insurer-covered access to the PFAS blood serum test in order to adequately support the health of those in Maine.

Sincerely,

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