

March 5, 2025

Senator Donna Bailey  
Representative Kristi Mathieson  
Committee On Health Coverage, Insurance and Financial Services  
100 State House Station  
Augusta, ME 04333

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

Dear Senator Bailey, Representative Mathieson and members of the HCIFS Committee:

On behalf of Harvard Pilgrim Health Care, a Point32Health company, I am writing to express our opposition to LD 582 - An Act to Require Health Insurance Carriers to Provide Coverage for Blood Testing for Perfluoroalkyl and Polyfluoroalkyl (PFAS) Substances. Harvard Pilgrim is a leading not-for-profit health and well-being organization that currently serves approximately 50,000 Maine fully insured commercial members. We are committed to providing high-quality and affordable health care, improving the health and wellness of our members, and creating healthier communities across the country.

If passed, LD 582 would require commercial insurance coverage, without cost share, of medically necessary blood testing for PFAS substances as recommended by a provider and in accordance with clinical guidelines established by the National Academies of Sciences, Engineering, and Medicine. PFAS substances are also known as forever chemicals that are used in a wide variety of products and industrial processes. PFAS chemicals have a widespread presence in the environment and have infiltrated the food and water supply. Due to their significant presence, PFAS chemicals can accumulate in the body and be found in blood streams.

While PFAS blood testing can tell you how much PFAS is present in one's body, the test ultimately has no clinical utility. There are currently no treatments to reduce PFAS levels. PFAS blood testing results cannot be used in the clinical management of an individual, nor can they help predict future health problems. Testing can also potentially lead to false positive results, resulting in additional unnecessary testing and treatments. A requirement to cover expensive, unnecessary testing that provides no clinical utility will only increase costs for consumers at a time when the cost of health care is already stretching budgets.

The Agency for Toxic Substances and Disease Registry states that PFAS blood tests are "most useful when they are part of a scientific investigation or a health study. A scientific investigation can show:

- The range of blood PFAS levels in community members.
- How the levels vary among different populations."<sup>1</sup>

If the committee finds value in PFAS blood testing results, we would recommend amending the bill to turn it into a public health screening program funded by the state.

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<sup>1</sup> <https://www.atsdr.cdc.gov/pfas/blood-testing/index.html>

Harvard Pilgrim appreciates the opportunity to provide comments on LD 582. For the reasons described above, we respectfully urge you find LD 582 Ought Not to Pass. If you have any questions, please contact me at any time.

Sincerely,

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