



STATE OF WISCONSIN
Division of Hearings and Appeals

In the Matter of

██████████
██████████
██████████

DECISION
Case #: MPA - 220762

PRELIMINARY RECITALS

Pursuant to a petition filed November 7, 2025, under Wis. Stat., §49.45(5), to review a decision by the Division of Medicaid Services (DMS) to deny Medical Assistance (MA) authorization for a bariatric hospital bed, a hearing was held on December 23, 2025, by telephone.

The issue for determination is whether the requested hospital bed was shown to be medically necessary.

PARTIES IN INTEREST:

Petitioner:

██████████
██████████
██████████

Respondent:

Department of Health Services
201 E. Washington Ave.
Madison, WI 53703

By: Written submission of Shelby Westover, COTA
Division of Medicaid Services
PO Box 309
Madison, WI 53701-0309

ADMINISTRATIVE LAW JUDGE:

Brian C. Schneider
Division of Hearings and Appeals

FINDINGS OF FACT

1. Petitioner is a 77-year-old resident of Grant County who is eligible for MA.
2. Petitioner weighs more than 310 pounds. He was hospitalized for three months in early 2025 after he hurt his back. At both the hospital and follow-up rehab hospital he was placed in a large-sized bariatric bed. When he left the rehab hospital he weighed 312 pounds.

3. On April 30, 2025, a semi-electric hospital bed and Hoyer lift were delivered to petitioner's residence, paid by Medicare. The bed was twin-size.
4. On August 25, 2025, National Seating and Mobility requested prior authorization for a heavy-duty, extra-wide fully electric hospital bed with a capacity of 350-600 pounds (a mattress also was requested but that request later was withdrawn), PA no. [REDACTED]. The request included no information on the bed that was provided in April, 2025.
5. The DMS requested information on the current bed and also noted that petitioner's 312-pound weight was well below the requested bed's capacity. The provider responded that petitioner's current weight could not be determined, and it did not provide any specifics concerning the current bed, noting only that petitioner "almost rolls off the edge of the standard bed."
6. By a notice dated October 15, 2025, the DMS denied the requested bed as not proven to be medically necessary as there was a lack of justification why the current bed was inappropriate, petitioner's weight was below the requested bed's standard, and because he already had a bed covered by Medicare.

DISCUSSION

For a piece of medical equipment, or a component of the equipment, to be covered by MA, it must meet certain criteria. As with any medical assistance service, the DMS must consider, among other things, the medical necessity of the service, the appropriateness of the service, the cost of the service, the extent to which less expensive alternative services are available, whether the service is an effective and appropriate use of available services, and if it is solely for the convenience of the recipient or caregivers. Wis. Admin. Code, §DHS 107.02(3)(e)1, 2, 3, 6, 7, and 8. As with all prior authorization requests, it is the provider's obligation to justify the provision of the service. Admin. Code, §DHS 107.02(3)(d)6.

In this case, the DMS consultant was able to ascertain that petitioner was provided a semi-electric hospital bed covered by Medicare in April, 2025. It thus was puzzling why a new bed was being requested just four months later. The consultant returned the request three times to find out the specifications of the current bed and whether petitioner met the criteria for the heavy-duty bed that was requested. The National Seating representative did not provide the requested information, so the request was denied.

At the hearing petitioner reported that the bed provided in April was just twin-sized, and that petitioner barely fits in it. The bed was provided without input from petitioner or his family, and without prior demonstration of its appropriateness. Testimony was that he has gained weight now, but the exact weight still is not known. His caregiver struggles with the manual crank used to raise him.

While I appreciate petitioner's testimony, the decision comes back to the requirement that the requesting MA provider must justify the need for the bed. From the information provided by DMS Consultant Westover, the National Seating representative seemed to be hesitant to provide the requested information, making me wonder what company provided the bed that they are now seeking to replace. Because the provider did not justify the medical necessity of the requested hospital bed in light of petitioner just recently being provided one, I must affirm the denial here. It could very well be true that the current bed is inadequate and possibly even unsafe, but there is no evidence from the provider backing those possibilities. At this point the provider, or another equipment provider, can file a new authorization request showing that the current bed is inadequate, but I cannot conclude that the denial of this request was incorrect.

CONCLUSIONS OF LAW

The requesting provider did not prove the medical necessity of the requested hospital bed.

THEREFORE, it is ORDERED

That the petition for review is hereby dismissed.

REQUEST FOR A REHEARING

You may request a rehearing if you think this decision is based on a serious mistake in the facts or the law or if you have found new evidence that would change the decision. Your request must be **received within 20 days after the date of this decision**. Late requests cannot be granted.

Send your request for rehearing in writing to the Division of Hearings and Appeals, 4822 Madison Yards Way, 5th Floor North, Madison, WI 53705-5400 **and** to those identified in this decision as "PARTIES IN INTEREST." Your rehearing request must explain what mistake the Administrative Law Judge made and why it is important or you must describe your new evidence and explain why you did not have it at your first hearing. If your request does not explain these things, it will be denied.

The process for requesting a rehearing may be found at Wis. Stat. § 227.49. A copy of the statutes may be found online or at your local library or courthouse.

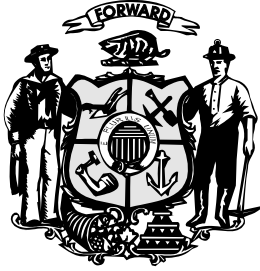
APPEAL TO COURT

You may also appeal this decision to Circuit Court in the county where you live. Appeals must be filed with the Court **and** served either personally or by certified mail on the Secretary of the Department of Health Services, 201 E. Washington Ave., **and** on those identified in this decision as "PARTIES IN INTEREST" **no more than 30 days after the date of this decision** or 30 days after a denial of a timely rehearing (if you request one).

The process for Circuit Court Appeals may be found at Wis. Stat. §§ 227.52 and 227.53. A copy of the statutes may be found online or at your local library or courthouse.

Given under my hand at the City of Madison,
Wisconsin, this 5th day of January, 2026

\s _____
Brian C. Schneider
Administrative Law Judge
Division of Hearings and Appeals



State of Wisconsin\DIVISION OF HEARINGS AND APPEALS

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The preceding decision was sent to the following parties on January 5, 2026.

Division of Medicaid Services