

Order in Discussion	Issue	Summary of Supporting Source	Context for Concerns	Action Requested of HHSC	Recommendation to HHSC	Source	APA Citation
1	<b>Cost-effectiveness and resource optimization</b>	Group services are more cost-effective, optimize resource use, and reduce costs.	Group settings provide efficient use of resources, addressing budget constraints and staffing shortages.	Group services optimize resource use and are more cost-effective, addressing budget constraints and staffing shortages effectively.	Retain group settings for cost-effectiveness and optimal resource use.	CMS	CMS (n.d.). Medicaid and School-Based Services.
2	<b>Impact on Federal Funding and State Budget</b>	SHARS is federally funded, and significant program changes can impact federal funding levels.	Drastic changes to SHARS, such as the removal of group billing, could lead to a decrease in federal funding. This may necessitate increased state funding to cover the gap, putting additional financial pressure on school districts.	Drastic changes to SHARS could reduce federal funding, necessitating more state funds or causing schools to fall further behind financially. Maintaining group billing practices is essential to ensure stable funding and financial stability for school districts.	Maintain current group billing practices to ensure stable federal funding and avoid increased financial burdens on the state and school districts.	SHARS	
3	<b>CMS mandate to decrease administrative burdens</b>	CMS emphasizes the need to decrease administrative burdens to facilitate efficient service delivery.	The removal of group settings will increase administrative burdens on schools by eliminating a full area of reimbursement and complicating documentation processes for Personal Care Services (PCS).	Removing group settings increases administrative burdens, complicating billing and documentation. CMS guidelines aim to reduce these burdens.	Adopt the flexibilities outlined by CMS to streamline billing processes and maintain group settings to reduce administrative burdens. Simplify interim billing documentation to ensure efficient service delivery.	CMS, OIG	Centers for Medicare & Medicaid Services. (2023). Delivering Service in School-Based Settings: A Comprehensive Guide to Medicaid Services and Administrative Claiming.; Office of Inspector General (2018). Reducing Administrative Burdens.
4	<b>Access to Services</b>	HHS and CMS released a guide to help schools expand access to Medicaid-covered health services.	Removing group settings for PCS will limit access to these services for students in Texas, as schools face challenges in providing individualized services due to resource constraints.	Maintaining group settings aligns with federal strategies to not reduce access.	Implement strategies from the federal guide to not reduce access to PCS by maintaining group settings.	HHS	U.S. Department of Health and Human Services. (2023). Biden-Harris Administration Takes Action to Help Schools Deliver Critical Health Care Services to Millions of Students.
5	<b>Importance of Least Restrictive Environment (LRE) and Inclusive Education</b>	Emphasizes that LRE encompasses the entire student experience, including social interactions and typical school activities, and highlights the importance of providing experiences similar to typically developing peers.	Removing group supports can conflict with LRE principles, reducing students' access to inclusive settings. This can limit social interactions, peer learning, and overall educational experiences, impacting both the philosophical foundation and practical application of inclusive education.	LRE is not just about physical location but includes providing experiences similar to typically developing peers. Removing group supports conflicts with LRE principles and limits inclusive settings. Maintaining group settings ensures compliance with federal mandates, supports holistic development, and promotes social interactions and peer learning.	Maintain group settings to ensure alignment with LRE principles, providing equitable experiences and supporting holistic development. This approach aligns with federal mandates and best practices, promoting social interaction and peer learning.	IDEA, TIES Center	IDEA (n.d.). Individuals with Disabilities Education Act. Retrieved from <a href="https://sites.ed.gov/idea/">https://sites.ed.gov/idea/</a> ; TIES Center (n.d.). Benefits of Inclusive Education. Retrieved from <a href="https://www.tiescenter.org/">https://www.tiescenter.org/</a>

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6	<b>Impact of accommodating audiology for Section 504 on SHARS group offerings</b>	While the inclusion of audiology for Section 504 is a positive change, it is extremely rare and does not compare to the significant impact of removing group offerings in SHARS.	The rare inclusion of audiology services under Section 504 should not overshadow the substantial loss and impact associated with the removal of group services in SHARS, which affects a much larger population of students needing diverse support.	Accommodating audiology services under Section 504 is laudable but rare. The removal of group offerings in SHARS will have a far greater impact, affecting a larger number of students who rely on diverse support. We must maintain group offerings in SHARS to ensure comprehensive support for a much larger population of students needing diverse support.	Maintain group offerings in SHARS while accommodating audiology services for Section 504 to ensure comprehensive support for all students.		
7	<b>Historical context of TEA's one-size-fits-all standard</b>	TEA's unofficial target led to the denial of services due to compliance-driven practices.	Historical example of how one-size-fits-all standards can negatively impact practices.	The historical 8.5% target set by TEA led to the denial of services for many students. We should avoid similar one-size-fits-all standards and maintain group settings.	Avoid setting similar one-size-fits-all standards by maintaining group supports for PCS to prevent negative impacts on students' opportunities.	Houston Chronicle, OSEP	Rosenthal, B. (2016). Denied: How Texas keeps tens of thousands of children out of special education. Houston Chronicle; Office of Special Education Programs. (2018). Texas report. Retrieved from <a href="https://www.houstonchronicle.com/denied/">https://www.houstonchronicle.com/denied/</a>
8	<b>Flexibilities for States</b>	The CMS guide provides states with new flexibilities to improve the delivery and funding of school-based health services.	Removing group settings increases the documentation and billing complexity for schools, hindering service provision.	Adopting CMS flexibilities can simplify billing and support under-resourced schools, improving efficiency and effectiveness.	Adopt the new flexibilities and guidance from CMS to maintain group settings for PCS. Simplify billing procedures and provide support for under-resourced schools to participate in Medicaid and CHIP programs, ensuring efficient service delivery.	CMS	Centers for Medicare & Medicaid Services. (2023). Delivering Service in School-Based Settings: A Comprehensive Guide to Medicaid Services and Administrative Claiming.
9	<b>Increased stakeholder demand for individual services when those may not always be in the best interest of the student</b>	Emphasizes the importance of aligning services with LRE and best practices, which support peer interactions and group services for better social and educational outcomes.	With the removal of group settings, individual services may become the expected norm, which can conflict with LRE principles and best practices. This shift can limit students' access to inclusive environments and place additional demands on staffing resources.	Removing group settings may lead to an increased demand for individual services, conflicting with LRE principles and straining staffing resources.	Recommend that HHSC maintain group settings for PCS to ensure alignment with LRE and best practices. This will promote inclusive practices, prevent the normalization of individual services, and manage staffing resources efficiently.	IDEA, TIES Center	Individuals with Disabilities Education Act. (n.d.). Retrieved from <a href="https://sites.ed.gov/idea/">https://sites.ed.gov/idea/</a> ; TIES Center. (n.d.). Benefits of inclusive education. Retrieved from <a href="https://www.tiescenter.org/">https://www.tiescenter.org/</a>
10	<b>Removing group supports hinders student development</b>	Emphasizes benefits of inclusive education and group settings for individuals with disabilities.	Group settings promote social interaction, peer learning, and life skills, essential for holistic development.	Group settings promote social interaction, peer learning, and life skills, essential for holistic development. Removing group supports can lead to increased isolation for students with disabilities.	Retain group supports to ensure holistic development and avoid increased isolation for students with disabilities.	TIES Center	<a href="https://www.tiescenter.org/">TIES Center (n.d.). Benefits of Inclusive Education. Retrieved from https://www.tiescenter.org/</a>

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11	<b>Normalization principle and its relevance to group supports</b>	Describes the principle of normalization, advocating for experiences as normal as possible for individuals with disabilities.	Promoting inclusion in typical school activities and routines is essential for students with disabilities.	The principle of normalization advocates for experiences as normal as possible for individuals with disabilities. Group supports promote inclusion in typical school activities and routines.	Retain group opportunities to ensure the necessary support for students.	Wolfensberger	Wolfensberger, W. (1972). The principle of normalization in human services. Retrieved from <a href="https://archive.org/details/principleofnorma00wolf/page/n9/mode/2up">https://archive.org/details/principleofnorma00wolf/page/n9/mode/2up</a>
12	<b>Successful implementation in other states (Colorado)</b>	Colorado has successfully implemented group settings for PCS.	Other states' successful models provide evidence that group supports are beneficial and sustainable.	Colorado's successful implementation of group PCS demonstrates its benefits and sustainability. We should maintain our group offering and address concerns with compliance directly.	Consider adopting practices from successful models in other states to retain group supports for PCS.	Colorado Medicaid	Colorado Medicaid (n.d.). Personal Care Services. Retrieved from <a href="https://hcpf.colorado.gov/shs-man">https://hcpf.colorado.gov/shs-man</a>
13	<b>Training and competency verification</b>	Need for clear, reasonable training requirements that ensure provider competency without undue burdens.	Current training requirements introduce additional complexities.	Current training requirements are complex. Allowing school districts to determine training guidelines can ensure competency without undue administrative burdens.	Align training and competency guidelines with federal recommendations to avoid unnecessary administrative tasks.	CMS	Centers for Medicare & Medicaid Services. (2024). Training and Competency Guidelines.
14	<b>Documentation requirements</b>	Requirement for documenting specific start and end times for each PCS activity is impractical and burdensome.	Adds unnecessary administrative work and does not align with CMS recommendations for documentation flexibility.	Specific start and end time documentation for each PCS activity is impractical. Removing this requirement can streamline processes.	Remove the requirement for specific start and end times per procedure to streamline documentation processes.	CMS	Centers for Medicare & Medicaid Services. (2024). Documentation Requirements.
15	<b>Lack of subject matter experts at HHSC</b>	HHSC lacks true subject matter experts in education and medical services in the school in this area, leading to misaligned policies and implementations.	Policies and implementations do not align with the needs of the program served.	Involving knowledgeable individuals in planning and decision-making can ensure practical and well-aligned policies. The need for a state-mandated advisory group is clear.	Involve knowledgeable individuals in planning and decision-making processes to ensure practical policies. The need for a state-mandated advisory group is clear.	HHSC	
16	<b>State's delayed release of policy changes impacting timely compliance</b>	State delays in policy release create compliance challenges for schools.	Late releases of policy changes hinder schools' ability to adapt and comply in a timely manner.	State delays in policy release create compliance challenges. Adequate time and clear communication for program changes are essential for effective participation and compliance.	Provide adequate time and clear communication for policy changes to ensure schools can respond and comply effectively.	State	