



## Advocating for Simplified Documentation of Personal Care Services (PCS) under SHARS

### Introduction

The current PCS documentation requirements under SHARS are complex and burdensome for providers, detracting from the quality of care delivered to students with disabilities. We propose a more practical, common-sense approach to PCS documentation that maintains compliance while reducing the administrative load on providers. Our goal is to advocate for a documentation process that supports care rather than hinders it.

### Current Challenges

- **Complexity:** Providers must document PCS for each student without any overlap in service times, even when care is naturally provided in group settings.
- **Administrative Burden:** Detailed, minute-by-minute tracking and differentiation between tasks for multiple students significantly increases workload, impacting the time available for direct care.

### Current Policy

The [current policy](#) states:

- A provider may perform PCS for more than one student per day as long as each student's care is based on their individualized education program (IEP) and needs. PCS may be provided in a group setting, but the time that the provider assists one student must not overlap with the time that the provider works with another student. PCS must be provided to one student at a time but may be provided to multiple students one after the other.
- PCS may be provided at the same time as another SHARS-eligible service if the student is receiving assistance with ADLs and IADLs from a PCS provider while receiving the SHARS-eligible service from another provider. PCS may not be billed for activities that are included in the other SHARS-eligible service that is performed by the same provider.
- Only the time spent on authorized PCS tasks for each student is eligible for reimbursement.
- Service logs for PCS must include all elements of a SHARS service log and both:
  - A description of the specific PCS task.
  - A record of the total billable minutes for each ADL and IADL provided. The total billable minutes for PCS are determined by combining the total billable minutes for each ADL and IADL performed.
- Note: The total billable minutes for PCS that are performed by a PCS provider cannot exceed the PCS provider's total number of hours at the place of service.

### Proposed Simplified Documentation Approach

1. **Unified Documentation with Individual Accountability:**
  - **Proposed Language Change:**  
*"A provider may perform PCS for multiple students throughout the day, ensuring each student's care aligns with their individualized education program (IEP) and specific needs. PCS may be provided in a group setting, and services can be documented in aligned time blocks (e.g., morning, midday, afternoon) that support group routines and activities, with individualized notes on specific deviations or unique needs per student."*

- **Simplification Proposal:**  
Document PCS tasks within structured time blocks rather than tracking each minute separately for each student. This allows providers to focus on the overall provision of care and note individual adjustments as necessary, reducing the administrative burden while maintaining compliance.
  - **Rationale:** This approach acknowledges the structured, routine nature of special education settings and supports efficient, compliant documentation without sacrificing individualized care.
2. **Flexibility in Overlapping Services:**
- **Proposed Language Change:**  
*"PCS may be documented in group settings where natural overlaps occur, as long as the PCS provider clearly indicates the individualized nature of support within the group activity. Documentation should reflect the care provided without requiring exact minute-by-minute distinctions for each task or student."*
  - **Simplification Proposal:**  
Allow for PCS tasks to be documented flexibly in group settings, emphasizing the individualized nature of support rather than strict time separation. This reduces unnecessary segmentation of services and aligns with the real-world delivery of care.
  - **Rationale:** This flexibility respects the practical dynamics of special education classrooms, allowing providers to focus on care delivery rather than on artificial divisions of time and tasks.
3. **Simplified Service Log Requirements:**
- **Proposed Language Change:**  
\*"Service logs for PCS must include:
    - A description of the specific PCS tasks performed.
    - A record of the total billable minutes for each activity, grouped by task categories (e.g., toileting, hygiene, feeding) within structured time blocks.
    - Individual notes for any unique requirements or variations in care."\*
  - **Simplification Proposal:**  
Simplify service logs by focusing on key elements and recording time in broader blocks rather than exact minute tracking. This approach allows providers to document effectively without excessive administrative tasks, ensuring compliance while aligning with natural care routines.
  - **Rationale:** Focusing on essential elements allows for accurate, manageable documentation that aligns with the flow of the school day and IEP goals.
4. **Adopt a Philosophy of "Documentation that Supports Care":**
- **Proposal:**  
*"Encourage HHSC to adopt a philosophy that prioritizes documentation practices which support and reflect the care provided, rather than overly burdensome processes that may impede service delivery. The goal is to maintain clarity and accountability while ensuring that providers can focus their efforts on direct care and student support."*
  - **Simplification Proposal:**  
Shift the focus of documentation to be a tool that enhances care rather than a barrier. Simplified, practical documentation will help providers deliver better care by reducing time spent on paperwork.

- **Rationale:** Simplified, practical documentation will lead to better compliance, reduced errors, and more direct care time, ultimately benefiting the students who rely on these services.

### **Supporting Example**

A detailed schedule of a typical day in the life of a special education teacher provides a real-world example of how PCS tasks are integrated naturally into group settings and routines. This example underscores the need for a documentation approach that reflects these practical realities rather than imposing overly detailed requirements.

### **Proposed Simplified Policy Language for PCS under SHARS**

#### **Revised Policy Language:**

- A provider may perform PCS for multiple students throughout the day, ensuring that each student's care aligns with their individualized education program (IEP) and specific needs. PCS can be provided in a group setting, with documentation that reflects care within structured time blocks (e.g., morning, midday, afternoon). Each block should include individualized notes for specific deviations or unique needs per student, rather than requiring documentation of each minute separately.
- PCS tasks may be documented in group settings where natural overlaps occur, as long as the individualized nature of support for each student is clearly noted. This approach recognizes the practical realities of special education classrooms and allows providers to document care without needing to distinguish exact minutes spent on each student individually.
- PCS may be provided concurrently with other SHARS-eligible services as long as the PCS tasks are distinct and not duplicative of activities included in the other SHARS-eligible service performed by the same provider. Documentation should clearly identify PCS tasks as separate when provided alongside other services.
- Only the time spent on authorized PCS tasks for each student is eligible for reimbursement. However, these tasks should be recorded within time blocks that reflect the natural flow of the school day, rather than minute-by-minute tracking.
- Service logs for PCS must include:
  - A description of the specific PCS tasks performed for each student.
  - A record of the total billable minutes grouped by task categories (e.g., toileting, hygiene, feeding) within structured time blocks, capturing the main activities performed.
  - Individual notes for any unique requirements or variations in care, to ensure clear accountability while maintaining a manageable documentation process.
- The total billable minutes for PCS tasks should not exceed the provider's total number of hours at the place of service. Documentation should focus on the overall provision of care rather than overemphasizing detailed segmentation of every task or minute.

#### **Philosophy Statement:**

- Adopt a philosophy of "documentation that supports care," prioritizing practical and efficient documentation practices that reflect and enhance the care provided. This approach aims to reduce administrative burdens and enable providers to focus on delivering high-quality, individualized support to students.

## **Conclusion**

Simplifying PCS documentation under SHARS will reduce administrative burdens, improve care quality, and maintain the integrity of individualized support for students. We urge HHSC to consider these recommendations for a common-sense approach that supports providers and enhances service delivery.

Questions may be directed to HHSC and TEA SHARS staff or TASB School Medicaid Services Division Director, Karlyn Keller Ed.D. at [karlyn.keller@tasb.org](mailto:karlyn.keller@tasb.org).

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