

July 8, 2024

Cecile Erwin Young
HHS Executive Commissioner
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HHSC Medicaid Medical and Dental Policies
MCDMedicalBenefitsPolicyComment@hhsc.state.tx.us

Reference: MCD Medical Benefits Policy Comment on School Health and Related Services (SHARS) program

Dear Commissioner Young and MCD Medical Benefits Team,

Thank you for the opportunity to provide comments on the proposed policy changes for the School Health and Related Services (SHARS) program. These changes impact over 900 school districts across Texas, affecting the essential medical services provided to students with disabilities. We appreciate the support and hard work of the Texas Health and Human Services Commission (HHSC) and the Texas Education Agency (TEA) on behalf of our state, our schools, and the students we serve.

Public education's primary responsibility lies in meeting children's academic needs. However, unmet healthcare needs can impair students' ability to attain their full academic potential. Schools have a unique opportunity to provide direct medical services to students with disabilities, seeing them more frequently than traditional medical settings, and addressing healthcare needs with less disruption to the educational program. SHARS provides much-needed funds that allow districts to support the diverse health-related needs of our most vulnerable students despite rising healthcare costs.

As the state agency overseeing SHARS, HHSC must establish and maintain a program that meets federal requirements, serves the students we all care about, and allows schools to maintain the integrity of both the educational and Medicaid programs. We urge HHSC and TEA to work closely with school districts to create guidelines that meet federal standards while recognizing the diversity of schools across our state and the need for flexibility in aligning school Medicaid requirements with school operations.

To that end, the Texas Association of School Administrators (TASA), the Texas Association of School Boards (TASB), the Texas Association of School Business Officials (TASBO), and the Texas Council of Administrators of Special Education (TCASE) have compiled our input on the proposed SHARS policy changes, detailed in the attached spreadsheet. Our primary concerns and recommendations are as follows:

1. Increased Administrative Burden

The proposed changes significantly increase the administrative burden on districts. Implementing and complying with these changes will require substantial additional time and resources, diverting focus

from direct student services. Maintaining streamlined processes as emphasized in the current SHARS Handbook and federal guide aligns with federal guidelines and ensures practical implementation.

2. Transparency and Stakeholder Participation

HHSC should ensure transparency in the policy-making process by involving stakeholders such as school staff, parents, and experts. Establishing a SHARS advisory group can provide valuable insights and foster collaboration, ensuring the development of practical and effective policies.

3. Reductions in Personal Care Services (PCS) Funding

The proposed policy changes introduce substantial cuts to PCS funding, which will have a detrimental impact on the ability of schools to provide necessary care for students with disabilities. PCS funding is critical for supporting students' daily living activities and ensuring they can fully participate in their educational programs. The reductions in PCS funding will not only unnecessarily limit the services available to students but also place additional strain on already stretched school resources. It is imperative to maintain adequate PCS funding to ensure that all students receive the care they need to succeed academically and thrive in their school environments.

4. Modifications to Documentation Requirements

Proposed documentation requirements, such as specific start and end times for each personal care service, are impractical and overly burdensome. Maintaining practical documentation standards that align with federal guidelines and school operations is crucial to avoid unnecessary administrative work.

5. Training and Resource Allocation

Allocating resources for effective training of school staff on new policies will ensure preparedness and compliance without disrupting educational activities. Proper training and resource allocation are essential to the successful implementation of any new policy changes.

6. Comprehensive Service Provision

Policies should include a broader range of functional skills and activities, ensuring that all necessary services are covered. This includes maintaining current group billing policies and allowing flexibility in billing practices to accommodate the diverse needs of students and schools.

7. Clarification of Policy Changes

Clear communication about the differences between current and proposed policies is essential. This includes detailed definitions of terms and comprehensive inclusion of functional, cognitive, and behavioral limitations to avoid confusion and ensure compliance.

The detailed spreadsheet attached provides a comprehensive overview of our specific input on the proposed changes. Each item is carefully analyzed, and our stance is supported by references to federal guidelines and practical considerations from other states.

We appreciate the opportunity to provide input. If you have any questions, please feel free to contact me.

Sincerely,



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Enclosures: Detailed Spreadsheet of SHARS Policy Comments

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