

Policy Change Concern Summary

Concern	Recommendation	Reasoning
<b>Administrative Burden</b>	Maintain streamlined processes as emphasized in the current SHARS Handbook and federal guide. Involve multiple stakeholders in the policy change process.	Increased administrative burdens detract from direct services to students and complicate compliance, making it difficult for school districts to manage resources effectively.
<b>Financial Impact</b>	Conduct a thorough impact analysis before implementing changes to understand and mitigate potential financial consequences.	Significant financial impacts can undermine the ability of districts to provide essential services to students, particularly those with disabilities who rely on SHARS for critical support.
<b>Lack of Subject Matter Experts at HHSC</b>	Establish a state-required advisory group consisting of representatives from small, mid-sized, and large schools, providers from each type of service, a parent of a child with disabilities and Medicaid, a TEA representative, an association representative, and a vendor representative.	Involving individuals with actual knowledge of the program in the planning and decision-making processes ensures that policies and implementations are practical and aligned with school district needs.
<b>Transparency and Stakeholder Input</b>	Improve transparency by documenting and sharing specific changes. Involve parents, school staff, subject matter experts, and communities in the creation of SHARS-related rules and regulations. Provide clear reasons for changes and support them with evidence. Ensure audits and feedback from the state offer specific reasons for disallowed items.	Districts want to comply correctly and need to understand not only what is happening but also why. Lack of transparency and shifting requirements contribute to audit issues and distrust.
<b>Comment Period</b>	Extend the feedback period to at least 30-45 days, allowing districts adequate time to review and provide meaningful feedback.	The current timeline is inadequate and does not consider the operational realities of school districts. This issue has been ongoing, such as the release of settlement offers for cost reports in December when schools are historically closed for two weeks. Involving stakeholders is essential for creating practical and effective policies.
<b>Personal Care Services (PCS)</b>	Ensure clear definitions and comprehensive inclusion of physical, functional, cognitive, and behavioral limitations. Remove the term "medical" from the definition of PCS to accurately reflect the nature of the services provided. Clearly differentiate PCS from instructional services to avoid confusion. Align PCS standards with federal requirements to prevent unnecessary reductions in services and funding.	Clear definitions are essential for understanding and compliance. Aligning standards with federal guidelines ensures that unnecessary cuts are avoided, thus preventing harm to schools and ensuring comprehensive service provision.
<b>ADLs and IADLs</b>	Include a broader range of activities and ensure flexibility and inclusivity in the list of activities. Ensure behavioral and functional supports are included as children have disabilities requiring medical support in all realms.	The removal of certain activities appears arbitrary and requires further input from school districts and families. Clear definitions ensure all necessary activities are covered and understood.
<b>Group PCS Billing</b>	Maintain the current policy allowing group PCS billing to reflect staffing realities and ensure flexibility in service provision. Recognize that providing services in a group setting is often more effective and less restrictive for students, supporting their need for least restrictive supports.	The prohibition of group PCS billing negatively impacts schools that are already struggling with staff shortages. This requirement has no basis in federal guidelines and fails to support the best practices for student services.
<b>Documentation Requirements</b>	Eliminate excessive requirements for frequent evaluations and detailed documentation. Maintain essential documentation practices that align with federal guidelines, reducing unnecessary administrative work.	Forcing schools to document each specific personal care service separately would require staff to spend more time documenting than delivering services, which is not in the best interest of students. Bundling services for billing purposes should simplify, not complicate, the documentation process.
<b>Training and Competency Verification / Licensed Health Care Practitioners</b>	Align training and competency guidelines with federal recommendations to avoid unnecessary administrative tasks. Allow LEAs, as the contractor with the state, to meet these requirements in-house through their expertise. Modify the requirement to permit other qualified personnel within the schools to fulfill these roles, not just licensed health care practitioners.	Aligning training and supervision requirements with federal guidelines reduces administrative burdens. Allowing schools to utilize their in-house expertise ensures practicality and efficiency.
<b>Interim Claiming and Timed Units</b>	Implement practical billing practices aligned with current policies and federal guidelines to avoid punitive measures.	Given staffing issues in schools, this standard is problematic and unrealistic. This requirement is not new but remains a problem, showing the state's continued imposition of impractical standards.
<b>Nurse-Delegated Tasks</b>	Provide clear definitions and practical guidelines that align with nursing requirements outside of schools. Allow other types of nurses, not just RNs, to fulfill the roles in school settings. Trust in licensed staff's judgment and reduce the administrative burden.	Many schools do not have nurses due to staffing challenges, and these standards could exclude them from the program through no fault of their own. Setting standards appropriate for school settings is crucial for maintaining program participation.
<b>Implementation Timeline</b>	Provide a clear and realistic implementation timeline, ensuring districts have sufficient time to prepare and comply with new policy changes.	Earlier this year, districts were informed they could no longer include bus monitors as part of the program with less than a week's notice and no guidance, causing significant disruption. Consistent short notice for major changes is impractical and unfair to districts.
<b>SHARS Improvements</b>	The SHARS Program can be enhanced by streamlining processes, increasing transparency, and involving stakeholders in policy decisions, ensuring efficient and effective student services.	The proposed SHARS policy changes present significant challenges that could negatively impact school districts, educators and students.