



BRECKENRIDGE VILLAGE

15062 CR 1145 | Tyler, Texas 75704
Office: (903) 596-8100 | Fax: (903) 596-8104 | BreckenridgeVillage.com

Public Comment for Texas HHSC Rate Hearing: ICF/IID

Members of the Texas Health and Human Services Commission,

My name is Melissa Perkins, and I am the Executive Director of Breckenridge Village, a licensed ICF/IID facility in Tyler, TX. I am writing to express my concerns and highlight the importance of adequate funding for ICF/IID services.

The ICF/IID program plays a crucial role in providing necessary and specialized care for individuals with intellectual disabilities, many of whom require 24-hour support and supervision. These facilities not only ensure the safety and well-being of residents but also enhance their quality of life through tailored care plans and community engagement.

However, the current rates of reimbursement are insufficient to cover the actual costs of providing these essential services. This financial strain has led to staff shortages, limited resources, and in some cases, the closure of facilities, which directly impacts the level of care residents receive.

It is vital that the rates are adjusted to reflect the true costs of care, including fair wages for direct support professionals, who are the backbone of these facilities. They work tirelessly to support residents, often under challenging conditions, and they deserve to be compensated fairly for their dedication and hard work.

Furthermore, adequate funding is necessary to maintain and improve the infrastructure of these facilities, ensuring a safe and nurturing environment for residents. Without proper funding, we risk compromising the quality of care and the health and safety of some of our most vulnerable citizens.

I am also encouraging the Commission to review and adequately adapt the outdated rate methodology, which does not account for inflation or increased costs. This failure results in inadequate funding for necessary services and resources. Providers in Texas NEED the reimbursement rate adjusted to cover the costs associated with unfunded mandates such as the DOL overtime threshold and increased costs due to federal and state regulatory requirements.



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In addition to the points listed above, I want to leave you with some data to absorb. The low reimbursement rates have a direct impact on the most vulnerable citizens of Texas by way of abuse, neglect and exploitation. Statistics on abuse, neglect, and exploitation of adults with developmental disabilities in Texas reveal significant concerns! According to the Texas Department of Family and Protective Services (DFPS), in fiscal year 2022, there were approximately 16,000 allegations of abuse, neglect, and exploitation of adults with disabilities investigated by Adult Protective Services (APS). **Of these, a substantial portion involved individuals with developmental disabilities.**

Here are some key statistics:

1. Abuse: Cases of physical, emotional, and sexual abuse remain a critical issue. Physical abuse is the most frequently reported type, followed by emotional and sexual abuse. Many cases go underreported due to the victim's inability to communicate or fear of retaliation.
2. Neglect: Neglect is often the most common type of maltreatment reported. It includes failure to provide necessary care, leading to physical harm or deterioration of the individual's health.
3. Exploitation: Financial exploitation is also a significant issue, where individuals with developmental disabilities are taken advantage of financially, often by caregivers or family members.
4. Confirmed Cases: The DFPS reported that, of the thousands of allegations made, around 30-40% were confirmed after investigation, which shows the seriousness of the issue.
5. Risk Factors: The risk of abuse, neglect, and exploitation is heightened in institutional settings, though it also occurs in home and community-based settings. Isolation, dependence on caregivers, and communication barriers increase vulnerability.

These statistics underscore the need for ongoing vigilance, training for caregivers, and robust protective measures to safeguard this vulnerable population. This highlights the need to recruit and retain qualified staff.

Additionally, a significant percentage of direct care workers in Texas rely on government assistance programs due to low wages and inadequate benefits. Nationally, it's estimated that around 45-50% of direct care workers, which includes those working in home care, nursing homes, and other settings, depend on some form of public assistance, such as Medicaid, food stamps (SNAP), or housing assistance. Texas, with its generally lower wages for these positions, likely reflects or exceeds this national trend.



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For example:

- Medicaid: A large proportion of direct care workers are eligible for and receive Medicaid due to their low-income levels.
- SNAP (Food Stamps): Many direct care workers also qualify for food assistance, as their earnings often fall below the federal poverty line.
- Housing Assistance: The high cost of living, especially in urban areas, leads many workers to seek housing subsidies.

In Texas specifically, while exact numbers can vary, it's likely that the percentage is in line with, or higher than, the national average given the state's minimum wage laws and cost of living challenges. These statistics highlight the economic challenges faced by those in critical caregiving roles and underline the need for wage reform.

My goal in providing the information above is to provide another perspective when reviewing the reimbursement rates. The low rates have a direct (negative) impact on both residents and staff, but in addition to that, these low rates are directly and indirectly increasing costs for the Commission as well. State government directly pays out millions of dollars by way of assistance but indirectly is spending millions of dollars investigating these extremely high abuse and neglect cases, as well as oversight for providers unable to meet standards due to workforce shortages. By increasing rates three things will happen: Texans needing services will be safer and able to live life abundantly; Texas providing services will be fulfilled and able to make ends meet with less reliance on government assistance programs, and state government will be able to spend money on more focused and positive outcome programs as good stewards of taxpayer dollars.

I urge the Commission to consider the long-term impacts of underfunding these essential services, not just for us but for you too. By investing in the ICF/IID program, we are not only supporting the individuals who reside in these facilities but also affirming our commitment to the well-being and dignity of all Texans with intellectual disabilities.

Thank you,

Melissa Perkins
Mp8675@breckenridgevillage.com