

August 7, 2024



*Recognizing persons with intellectual developmental disabilities
for their potential, not their limitations.*

Texas Health and Human Services Commission:

The reimbursement rates and methodologies must be revised to accurately reflect the true costs of providing essential services for Texans with Intellectual and developmental disabilities (IDD).

The existing rates are insufficient to recruit and retain DSPs, supervisors, quality assurance staff, and nurses. This results in a severe workforce shortage that destabilizes care for individuals with IDD and compromises service quality. With fewer workers familiar with the complex rules, regulations, and billing requirements associated with IDD services, the standard of care diminishes significantly.

The current rates and the assumptions behind them have imposed unsustainable cost burdens on providers, negatively impact the retention and recruitment of DSPs, nurses, and other essential staff, and threaten the viability of our service system. This situation endangers the IDD population and risks the health and safety of our state's most vulnerable residents.

Given that Texas does not credential DSPs, but still requires certain expertise and experience to ensure the health and safety of people with IDD living in group homes, compensation should be modeled on state-supported living centers (SSLCs), where staff qualifications and responsibilities are similar. This is especially crucial since community group homes have fewer backup staff for assistance in crises or routine maintenance compared to SSLCs.

I write today to urge the Texas Health and Human Services Commission (HHSC) to adjust the Home and Community-based Service (HCS) and Intermediate Care Facility (ICF) rates and their associated methodologies. Currently, these rates significantly undervalue the true costs of delivering services to people with intellectual and developmental disabilities (IDD) across the state, including the crucial contributions of front-line direct service professionals (DSPs). HHSC's present methodology for calculating wage reimbursements for community-based DSPs in Texas threatens to exacerbate the ongoing workforce crisis, thereby neglecting many of our most vulnerable Texans.

As a concerned Texan, I implore you to take immediate action to address these critical issues with current rates and rate methodology. It is essential to better support community-based services and the DSPs who provide indispensable care for many of our fellow Texans who cannot care for themselves.

Sincerely,

A handwritten signature in blue ink that reads "Lora Butler".

Lora Butler

President, CEO