Submitter:

Date: 10/23/2007

Organization:

Category:

Occupational Therapist

Issue Areas/Comments

GENERAL

GENERAL

This rule has helped fund many needed equipment for special ed. Please continue this benefit

Submitter:

Mrs. Janet Zurovski

Date: 10/23/2007

Organization:

SCCOE

Category:

Other Health Care Professional

Issue Areas/Comments

GENERAL

GENERAL

I am an audiologist who provides direct services in auditory training with Deaf/HOH students. MediCal/MAA funding is crucial to developing curriculum and relevant materials for the students I serve in our COE program. Please do not consider eliminating this program.

Page 2 of 35 October 29 2007 09:39 AM

Submitter:

Ms. Thomas Ambrosino

Organization:

City of Revere

Category:

Local Government

Issue Areas/Comments

GENERAL

GENERAL

See attachment

CMS-2287-P-396-Attach-1.DOC

CMS-2287-P-396-Attach-2.TXT

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October 29 2007 09:39 AM

Date: 10/23/2007

October 23, 2007

Centers for Medicare and Medicaid Services

Re: CMS Rule Change for Medicaid Reimbursement

Dear Sir/Madam:

I am writing to express my strong opposition to the rule change proposed by the Centers for Medicare and Medicaid Services ("CMS"), published in the Federal Register, which will restrict federal Medicaid reimbursements to municipalities for certain school-based Medicaid services. As I understand the proposed change, if adopted, CMS will no longer reimburse municipalities for certain administrative activities such as program planning, referral and monitoring, as well as certain types of transportation.

You should know that CMS's proposed rule change will have a devastating impact on communities like Revere. Our City's school department provides significant Medicaid services to our student body. The City depends upon federal reimbursement of these services to maintain its current education budget. If the federal reimbursements are restricted as proposed by CMS, the Revere School Department will suffer financially and be forced to cut other education services, including teacher positions. In light of the increasing mandates from the federal government under the No Child Left Behind Law to improve academics – mandates which already impose high costs on local school districts -- it seems incongruous that this same federal branch would seek to cut off the very funding that makes possible the required academic advances.

On behalf of the City of Revere, I implore you to reject this punitive rule change.

Sincerely,

Thomas G. Ambrosino Mayor

Submitter:

Mr. Richard Smith

Date: 10/23/2007

Organization:

North Attleboro School Department **Local Government**

Category:

Issue Areas/Comments

GENERAL

GENERAL

October 23, 2007

Edward M. Kennedy 317 Russell Senate Building Washington, DC 20510

Dear Senator Kennedy:

I am writing to express my concern regarding the proposed rule changes being proposed by the Center for Medicare and Medicaid Services (CMS) that would eliminate payment to schools and school districts for performing Medicaid administrative functions. Our staff members work diligently to process Medicare reimbursements for our community. Since 1998, our Administrative claims have totaled \$926,941, with those funds going to our town's general fund, and they are desperately needed by all of our town departments.

Our School Department assumes this administrative responsibility for the benefit of our schools and community, but is solely responsible for the payment of our employees while they are completing this important task. It is a responsibility we accept, as a percentage of the reimbursement for administrative functions annually is included in the School Department budget.

Senator, I thank in advance for your consideration of this important issue.

Very truly,

Richard A. Smith Superintendent of Schools

> October 29 2007 09:39 AM Page 5 of 35

Submitter:

Mr. Richard Smith

Date: 10/23/2007

Organization:

North Attleboro School Department

Category:

Local Government

Issue Areas/Comments

GENERAL

GENERAL

October 23, 2007

John F. Kerry 317 Russell Senate Building Washington, DC 20510

Dear Senator Kerry:

I am writing to express my concern regarding the proposed rule changes being proposed by the Center for Medicare and Medicaid Services (CMS) that would climinate payment to schools and school districts for performing Medicaid administrative functions. Our staff members work diligently to process Medicare reimbursements for our community. Since 1998, our Administrative claims have totaled \$926,941, with those funds going to our town s general fund, and they are desperately needed by all of our town departments.

Our School Department assumes this administrative responsibility for the benefit of our schools and community, but is solely responsible for the payment of our employees while they are completing this important task. It is a responsibility we accept, as a percentage of the reimbursement for administrative functions annually is included in the School Department budget.

Senator, I thank in advance for your consideration of this important issue.

Very truly,

Richard A. Smith Superintendent of Schools

Submitter:

Mr. William Fisher

Date: 10/23/2007

Organization:

Cape Cod Reg. Tech. High School District

Category:

Local Government

Issue Areas/Comments

GENERAL

GENERAL

The proposed changes to Medicaid/Medicare Reimbursements to schools for functions related to administrative responsibilities performed in relation to Medicaid will be devistating to local school budgets and staffing related to services essential to supporting core public healthservices to our most in need students. These proposed changes must be voted down by Congress. Schools are on the 'front lines' in provided critical public health support and information services to significant numbers of young people who can not or do not seek helath related services and education as well as important mental health resources available in schools.

Submitter:

Mr. Daniel Durgin

Date: 10/23/2007

Organization:

Tantasqua Regional School District

Category:

Academic

Issue Areas/Comments

GENERAL

GENERAL

The climination of Administrative expenditures and costs related to transportation of school age children would be devastating to many districts. It is our hope that the program will continue to support our most needy students.

Page 8 of 35 October 29 2007 09:39 AM

Submitter:

Mrs. carol gaston

Date: 10/23/2007

Organization:

humphreys county school district

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

The proposed rule that would eliminate reimbursement under the Medicaid program for the costs of school-based administrative and transportation services would severely impact services to students. It will be damaging to our ability to meet the needs of students with disabilities and all students in our school district. Since IDEA allocations have never reached their intended levels, we rely on Medicaid reimbursement to supplement IDEA funding, to ensure children with disabilities are provided free, appropriate education in the least restrictive environment.

Your support in defeating the proposed elimination of Medicaid reimbursements for school-based administration and transportation is respectfully requested and greatly appreciated.

Page 9 of 35 October 29 2007 09:39 AM

Submitter: Teri Jordan Date: 10/23/2007

Organization: Taft City School District

Category: Nurse Issue Areas/Comments

GENERAL

GENERAL

I am writing to you in response to the proposed rule CMS-2287-P. As a school nurse I am strongly opposed to this rule passing. If Medicaid reimbursement were to be disconinued the children our our school district would suffer. The money received from Medicaid is used to supplement health care services provided to the children at our schools. Without this funding we would not be able to hire transportation aides to ride the bus with children that have severe disabilities; such as tracheostomies, ventilators, and seizure disorders, these children must have an aide with them during transportation to ensure their safety on the bus. The bus drivers must have special training to transport children with severe disabilities, medicaid funds help pay for this training.

I am stongly opposed to this policy, it is a bad policy, it could result in increased costs in the long run, the money received from medicaid helps cover the cost of getting the message out to the parents of the children in the school district--important messages about health care coverage, health issues, getting children connected to health services before health issues escalate and become catastrophic.

Schools today are the primary source of information and referrals for families to a wide range fo services, including those covered by medicaid programs. Parents and children trust the school districts to provide information on housing, food, and health services.

As a nurse I know that school staff go to extraordinary ways to provide services to all children, these services go beyond the educational programs.

As someone who will help to make the decision regarding this policy please consider the damage done to children with the passage of the policy, we depend on medicaid funds to make the life of these children a little easier, allowing them access to valuable education so they can become productive members of society, so they can live a happy and healthy life, with good access to medical services thay may not be provided any other place but the school and by the school nurse. In our town we have no hospital, so we have limited health care, the parents send the child to school on a specialized bus, with a specialized transportation aide, with a note for the school nurse to please listen to the childs chest, the parent is not sure if the child is sick or not and wants to know if they need to see the doctor. This is a services that may continue without funding, but maybe it won't. Not all schools have the funds to hire a nurse, our district relies on medicaid funding to pay for health services in the district.

So once again I ask that you consider opposing proposed rule CMS-227-P. Thank you for your time and consideration.

Teri L. Jordan, BSN, RN District Nurse Taft City School District

Taft Union High School District.

Page 10 of 35 October 29 2007 09:39 AM

Submitter:

Date: 10/23/2007

Organization:

Category:

Government

Issue Areas/Comments

GENERAL

GENERAL

I support the Medicaid administrative matching funds for school districts as these dollars have helped small rural regional systems provide critically health promotion, prevention and early intervention services to students and their families who otherwise would receive it.

October 29 2007 09:39 AM

Submitter:

Mrs. Kathleen Hosterman

Organization:

Brookfield Elementary School

Category:

Academic

Issue Areas/Comments

GENERAL

GENERAL

There are many resources that are available to low income towns that are already stretched beyond their ability to provide for many of their citizens. If we further deplete these funds, it will just become a bigger concern for the state government and more resources will be drained on a higher level. The funds are currently being given back to the people who need them. Leave the funds where they are and are being used for those who truly need them.

Kathleen Hosterman Brookfield Principal Date: 10/23/2007

Date: 10/23/2007

Submitter:

Mr. Richard Zinkus

Wales Elei Academic

Organization:
Category:

Wales Elementary School

Issue Areas/Comments

GENERAL

GENERAL

The Elimination of Reimbursement under Medicaid for School Administration Expenditures and Costs Related to Transportation of School-Age Children between Home and School would deal a devastating blow to many area school departments. We rely on these funds to help support various health programs in our schools along with employees performing these services. The administrative match has provided critically needed resources for health promotion, prevention and early intervention services. Please do not discontinue this funding as it is imperative to an overall successful school operation. Thank you for your attention to this very important matter.

Page 13 of 35 October 29 2007 09:39 AM

Submitter:

Mr. Steven Bliss

Date: 10/23/2007

Organization:

Tantasqua Regional School District

Category:

Academic

Issue Areas/Comments

GENERAL

GENERAL

Matching funds are critically important to our school district and to districts across the Commonwealth in trying to meet students' needs concerning health and wellness. Elimination of such funds would prove enormously distressing to our system and would serve to reduce and in some instances eliminate student services.

October 29 2007 09:39 AM

Page 14 of 35

Submitter:

Ms. Mary Shide-Hartje

Date: 10/23/2007

Organization:

Santa Clara County Office of Education

Category:

Speech-Language Therapist

Issue Areas/Comments

GENERAL

GENERAL

Please do not eliminate this program. It generates money for therapy equipment for our students with special needs. Thank you for reading this.

Page 15 of 35 October 29 2007 09:39 AM

Date: 10/23/2007

Submitter:

Ms. Rachel Norton

 ${\bf Organization:}$

Ms. Rachel Norton

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

I am writing to strongly object to the proposed rule. School districts are already struggling to make ends meet for their special education programs because the Federal government has never fully funded its obligations under IDEA. Now you want to take away Medicaid reimbursements as well, which means the neediest children (who are the ones qualifying for Medicaid in the first place) will receive even less support for the Federal government.

Page 16 of 35 October 29 2007 09:39 AM

Submitter:

Mrs. Jennifer Anderson

Organization:

Bend-LaPine School District

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

Our school and its childern CANNOT be without the FAN (Family Access Network) program. This service provides for our most needy families the blessings of food, clothing, medical services, dental service and eye exams. I personally have spent hundreds of hours devoted to community service in our county and I know first hand of the countless donations that this precious program secures for our most needy youth and their families. My students CANNOT learn when their basic needs are not met. Scores of families, on a yearly basis, seek and receive crucial help from this amazing program. PLEASE lead with compassion and empathy by giving thorough consideration to the negative impacts this elimination will create. This struggling generation and their future can be given hope by maintaining or improving the funding of the FAN program. PLEASE DO NOT CUT even a small fraction of funding that is currently available to the FAN(Family Access Network) program. Passionately submitted for consideration by Jennifer Anderson, Science Teacher for 17 years in the Bend-LaPine Schools and community member for 35 years.

October 29 2007 09:39 AM

Date: 10/23/2007

Submitter:

Ms. L Loubsky

Date: 10/24/2007

Organization:

Mohawk Trail School District

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

The decision to change regulations at this level should come from the legislature not be made without their input. It is a critical change that will jeopardize children's access to needed services and in some communities serve as a tipping point for the viability of our schools and towns financially. These reimbursements serve many children and removing reimbursement will do them a disservice. Let the law be considered at the legislative level. Many of our state and federal mandates require schools to provide services which are not funded at any level. It would be the straw that breaks some town and district backs to lose medicaid reimbursement in this climate of chronic educational underfunding and exponential rises in costs of fuel, benefits, and special education. Please leave the rules in place until there is greater public and legislative voice in the process. Change resulting in this financially monumental decision should be legislated.

October 29 2007 09:39 AM

Date: 10/24/2007

Submitter:

Patricia Adelmann

 ${\bf Organization:}$

Patricia Adelmann

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

I am appalled that the schools' administration cost for medicare would be eliminated. All schools are struggling with little funding to provide educational services. If the funding for medicare administrative costs is eliminated, the children who need medical services will be neglected. The schools do not have the resources.

Sincerely,

Patricia N. Adelmann

Page 19 of 35 October 29 2007 09:39 AM

Submitter:

Mrs. Jean Phelps

Date: 10/24/2007

 ${\bf Organization:}$

Coastal Educational Collaborative

Category:

Other Government

Issue Areas/Comments

GENERAL

GENERAL

The proposed rule changes that would eliminate payment to schools and school districts for performing Medicaid administrative functions would heavily impact the school districts that comprise them membership of our Educational Collaborative.

Our schools and school districts are expected to be deeply impacted by the proposed rule changes in the Medicaid program. If as CMS maintains that schools/school districts do not have the authority to conduct Medicaid administrative activities, and therefore is proposing that schools/school districts should no longer be eligible for federal matching funds for school employees performing such services. Our local education organizations will be affected deeply by this proposed rule because federal Medicaid matching funds supports core public health staff in the schools, especially nurses, OTs, Pt's and SPlang therapists as well as mental health professionals serving some of the most needy students. Without these supports these students will most likely end up being placed in more restrictive and much more costly private special education school placements. In several districts, the administrative match has provided critically needed resources for health promotion, prevention and early intervention services.

October 29 2007 09:39 AM

Submitter:

Dr. Diana minton

Date: 10/24/2007

Organization: Category: Ipswich Public Schools
Local Government

Issue Areas/Comments

GENERAL

GENERAL

We are a small school system which depends on every dollar to provide services for the children we serve and educate. It would be a serious loss for us to have the funds from medicaid pulled from our funding sources. The service is provided as would be provided in a hospital. Only the site of the service changes! Our providers by certification and can provide these services, to children, in either setting. Actually when a person is in their home the services are frequently provided by agencies such as Visiting Nurses at the home site. The place of the service is not relevant to providing the service. Thus a school is equally able to provide such service. Location should not be a controlling factor.

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Submitter: Mr. Terry Wiggin Date: 10/24/2007

Organization: Dracut Public Schools
Category: Local Government

Issue Areas/Comments

GENERAL

GENERAL

To whom it may concern,

I would like to register the Dracut Public Schools opposition to proposed changes in 42 CFR Parts 431,433, and 440 that would eliminate Medicaid reimbursements to schools for certain transportation and administrative costs. As noted in the Federal Register (Volume 72, No. 173, Page 51398) CMS has previously recognized that schools and school districts may perform activities that provide support for the Medicaid State Plan. The word may is somewhat disingenuous as we are required by federal law to provide these services. School districts like Dracut across the country have no option to not provide these services.

For a child to receive these services, the child must be able to get to the location where the services are provided. What the proposed change says is that if a child gets these services in a clinical setting transportation will still be reimbursed, but if the IDENTICAL services are provided in a school setting, which may in fact be more beneficial to the child, transportation will not be reimbursed. You are in effect creating yet another unfunded mandate and increasing the local tax burden, which in turn limits funds available for direct education. This proposed change is plainly a mechanism for the federal government to reduce its obligation to children requiring these services.

Just as the child must be able to get to and from the services, someone has to hire and evaluate staff providers, negotiate contracts with other service providers, deal with parents who want to discuss these services, process payments to staff and contracted providers. To pretend that direct services can be provided without associated administrative costs is unrealistic, ignorant, or both. It is easy to put the term administrative into this discussion and play on a perception that such costs are always to high. I again would suggest that it is the unfunded mandates that create this problem, and this change would again create such a situation.

Mcdicaid is a good and valuable program that benefits many children. Yes, school districts receive a PARTIAL reimbursement to cover THE TOTAL COST of providing medical services to children in need of these services. The Dracut Public Schools opposes any change in that mission.

Respecfully Submitted

Terry L. Wiggin, RSBA Dracut Public Schools School Administrator

Page 22 of 35 October 29 2007 09:39 AM

Submitter:

Mr. Daniel Marenda

Date: 10/24/2007

Organization:

Spring Valley C. C. School District 99

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

Please do not do anything to further erode federal funding for schools, especially for students with disabilities. The government has not lived up to its 20 years old promise to special education at the 40 % level and the elimination of reimbursement under Medicaid for schools would further harm those students. It would also cause school districts to divert some of its funding for regular education to cover this shortfall in funding for the special programs which are mandated (and needed) but not funded. I fail to see how members of Congress can be so crass or uninformed when it comes to taking care of the children in this great country!

Date: 10/24/2007

Submitter: Ms. Cynthia Krackovic

Organization: Seven Hills Charter Public School

Category: Other Health Care Provider

Issue Areas/Comments

GENERAL

GENERAL

Eliminating Medicaid Reimbursement to schools/school districts already working under extremely tight budgets would deeply impact the ability of schools to provide critically needed resources for health promotion, prevention and early intervention services. If the Medicaid program questions the "authority" to conduct services, maybe the rule change should be such that it clarifies the authority of the schools/school districts in providing those services.

Page 24 of 35 October 29 2007 09:39 AM

Submitter:

Mr. Marty Ricconi

Date: 10/24/2007

Organization:

L.E.A.S.E.

Category:

Health Care Professional or Association

Issue Areas/Comments

GENERAL

GENERAL

Please stop efforts to reduce the administrative claiming and transportation claiming for school children. The funding is absolutely critical to providing important services to our schools. The 27 school districts I represent have no replacement for this funding and are experiencing increasing deficit budgets to provide the mandated services now. Please support medical services to children.

Page 25 of 35 October 29 2007 09:39 AM

Submitter:

Elizabeth Tolson

Date: 10/24/2007

Organization: Category:

Holbrook Public Schools Other Health Care Provider

Issue Areas/Comments

GENERAL GENERAL

I am concerned about the potential withdrawal of medicaid funds from the public schools. We have more and more students coming to school with medical/health needs that require nursing and therapy care. It is unjust to preclude schools from reimbursement for such services which are clearly health related. Schools have become much more than academic providers as we include larger numbers of students with special needs. In an effort to be an inclusive school community, it is essential that these students' needs are met within the school setting. Often these needs are solely health related. By providing health services, we are giving students access to education in the least restrictive setting. Schools need to be reimbursed for this. I am strongly urging legislators to reconsider this initiative of withdrawing medicaid funding from the public schools.

> October 29 2007 09:39 AM Page 26 of 35

Date: 10/24/2007

Submitter : Organization :

J Wingler

J Wingler

Category:

Individual

Issue Areas/Comments

iosac mi cas, comi

GENERAL

GENERAL

Education funding in general is too low. How does our government expect the exceptional needs students to receive the services they need? Government(federal and state) need to look at other areas for cuts. Education of any kind should be priority. Does it really take 10 people in 1 office to change a light bulb?

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Submitter:

Dr. Les Olson

Date: 10/24/2007

Organization:

Stoneham Public Schools

Category:

Local Government

Issue Areas/Comments

GENERAL

GENERAL

The comment in Table II on page 51402 of the Federal Register regarding the proposed amendment is incorrect. The cost shift will not be from the Federal Government to the States but from the Federal Government to local school districts. To the degree that we are unable to pick up this cost, this will result in a direct loss of service to other students as we will be forced to reduce other budgets to provide the required services.

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Submitter:

Mr. John Mc Fadden

Date: 10/24/2007

Organization:

Blue Hills Regional Vocactional Technical School

Category:

Other Government

Issue Areas/Comments

GENERAL

GENERAL

The Blue Hills Regional School District opposes this regulative change as it imposes additional costs on our district communities that should be absorbed by Medicaid. The revenues from Medicaid are used to offset costs imposed by the Federal and State laws concerning the educational needs of Special Needs students. Imposition of this change would shift the costs from Medicaid to local funding sources and would add an unnecessary additional financial burden to already strapped communities struggling to meet their educational requirements. Also, whereas the Federal Government's contribution is the least of the three primary contributors to public education; namely, the community contribution, the individual state funding and federal grants and medicaid reimbursement, this action further reduces federal contribution toward education at a time when more not less is needed and should be expected. Further, this proposed action is regressive in that it would impact all student's in an adverse manner to some degree. This docket item should be rescinded.

Submitter:

Mr. John Young

Date: 10/24/2007

Organization:
Category:

Rhode Island Department of Human Services State Government

Issue Areas/Comments

GENERAL

GENERAL

See Attachement

CMS-2287-P-422-Attach-1.PDF



Department of Human Services
DIVISION OF HEALTH CARE QUALITY,
FINANCING AND PURCHASING
600 New London Avenue
Cranston, R.I. 02920

October 23, 2007

Centers for Medicare & Medicaid Services Department of Health and Human Services Attention: CMS-2287-P Mail Stop S3-14-22 7500 Security Boulevard Baltimore, MD 21244

Reference: File Code CMS-2287-P

To Whom It May Concern:

The Rhode Island Department of Human Services is pleased to submit these comments on the *Proposed Rule* published in the *Federal Register* on September 7, 2007 that would eliminate reimbursement under Medicaid for school administration expenditures and costs related to transportation of school-age children between home and school.

For the record, the State of Rhode Island recognizes the authority of the Secretary of the U.S. Department of Health and Human Services under Section 1903(a)(7) of the Social Security Act (Act) to determine what is "necessary for the proper and efficient administration of the State Plan." The specific statutory language is as follows:

"(7) subject to section 1919(g)(3)(B), an amount equal to 50 per centum of the remainder of the amounts expended during such quarter as found necessary by the Secretary for the proper and efficient administration of the State plan.

Current Federal regulations at 42 CFR 433.15(b)(7) also provide in this regard:

"(7) All other activities the Secretary finds necessary for proper and efficient administration of the State plan: 50 percent. (Section 1903(a)(7).) (See also §455.300 of this subchapter for FFP at 90 percent for State Medicaid fraud control units under section 1903(a)(6).)"

The *Proposed Rule* proposes to add a § 433.20 to the regulations that would have the effect of totally eliminating Federal financial participation (FFP) for "administrative activities by school employees, school contractors, or anyone under the control of a public or private educational institution." The sole explanation given is:

". . . the Secretary has determined that such activities can only be properly conducted, overseen and appropriately allocated to Medicaid when conducted by employees of the State or local Medicaid agency."

This is complete reversal of ten years of Federal policy, as the following brief chronology shows:

- August 1997 Health Care Financing Administration (HCFA) issued Medicaid and School Health: A Technical Assistance Guide. The document stated: "Title XIX of the Act provides for the availability of FFP for state's claims for administrative expenditures that are found to be necessary by the Secretary for the proper and efficient administration of the Medicaid state plan." The guide delineated "Guiding Principles of Administrative Claiming".
- May 21, 1999 HCFA issued a State Medicaid Director Letter (SMDL) addressing three school-based claiming issues: (1) use of a bundled rate to pay for medical services provided to Medicaid-eligible children; (2) State claiming for school health-related transportation services for children with Individualized Education Plans (IEPs); and (3) State claiming for school health-related administrative activities. With respect to the latter, HCFA indicated that a "guide is expected to be published this Summer".
- February 2000 HCFA issued a draft Medicaid School-Based Administrative Claiming Guide inviting comments.
- November 2002 The Centers for Medicare & Medicaid Services (CMS) issued a revised draft *Medicaid School-Based Administrative Claiming Guide* inviting comments.
- May 28, 2003 Cover memorandum from the Centers for Medicare & Medicaid Services sent distributing the *Medicaid School-Based Administrative Claiming Guide*.

The preamble to the *Proposed Rule* only acknowledges the 1997 Technical Assistance Guide and the 2003 Claiming Guide. The preamble fails to acknowledge the collaboration between what has historically been a Federal-State partnership that led to the final Claiming Guide. The *Proposed Rule* belies that historical partnership and the agreements between the States and Federal Government to claim FFP for school-based administrative costs under Title XIX.

¹ Federal Register, 72(173), September 7, 2007, 51398.

Rule 2287-P seeks to cut more than \$4 billion in funding that currently supports essential health-related services. The proposed cuts will ultimately increase local taxpayer costs for federally mandated services and will result in cuts of local education programs and healthcare services for school children. The proposed cuts will also lead to increased Medicaid expenditures due to increased emergency room use and the late detection of preventable medical conditions. Therefore, The Rhode Island Department of Human Services joins child welfare advocates throughout the country in opposing the changes set out in Rule 2287-P. We respectfully request that CMS withdraw the rule and continue reimbursement at current levels.

Sincerely

John R. Young Deputy Director

Division of Health Care Quality, Financing, and Purchasing Rhode Island Department of Human Services

Date: 10/24/2007

Submitter:

Ms. Jennifer White

 ${\bf Organization:}$

Ms. Jennifer White

Category:

Individual

Issue Areas/Comments

GENERAL

GENERAL

Please reconsider eliminating the Medicaid Program for School Administration Expenditures. There are numerous functions that the school's professionals need to do to effectively give health services to students. These items are not covered in the Direct Service Claiming. These include several meetings, discussions with parents, developing special programs, Medicaid outreach, translating to students and families about health services, just to name a few. School depend on this reimbursement to give students the free and public education they deserve and that is mandated by the Federal Government. Thank you.

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Submitter:

Mrs. Carrie Turner

Date: 10/24/2007

Organization:

Raytown C-2 School District

Category:

Academic

Issue Areas/Comments

GENERAL

GENERAL

SDAC monies are extremely beneficial to the services our students receive. We provide mental health professional support for students and families within our community due to the medicaid funding available for school districts. These supports will no longer be available if funding is cut.

Page 32 of 35 October 29 2007 09:39 AM

Submitter:

Date: 10/24/2007

Organization:

Category:

Academic

Issue Areas/Comments

GENERAL

GENERAL

If schools are required by the federal government to meet the needs of ALL children then the federal government should be required to provide reimbursement for services that a child needs at school to help them succeed. Our schools and teachers go above and beyond to meet the needs of children and funding should stop being taken away, including medical funding. Our special education students WILL be left behind if this reimbursement funding is taken away. I am trusting our country's leaders to do the right thing and continue this program.

Page 33 of 35 October 29 2007 09:39 AM

Date: 10/24/2007

Submitter:
Organization:

Ms. Ann Bradshaw

Mashpee Public Schools

Category:

Academic

Issue Areas/Comments

GENERAL

GENERAL

I am writing to express my grave concerns about the proposal to reduce Medicaid reimbursement for services provided in public schools. School districts and municipalities depend on the Medicaid reimbursement funds to support the diverse needs of special education students. A reduction in the reimbursement will not decrease our responsibility to provide these services. The funds will have to be taken from general education.

Page 34 of 35 October 29 2007 09:39 AM

Submitter: Date: 10/24/2007

Organization:

Category: Speech-Language Therapist

Issue Areas/Comments

GENERAL

GENERAL

PLEASE eliminate billing of Medicaid for direct medical services also! If the federal government transferred the \$453 billion spent reimbursing direct medical services over to increasing the percentage of IDEA that is funded, everyone would win. There would be therapists who could then focus their time actually helping the children vs. completing Medicaid paperwork when the therapists or children never see a dime of the funds.

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