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ABI Waiver Program

ABI Program Services – Cognitive Behavioral Services Description:

Individual interventions designed to increase an individual's cognitive and behavioral capabilities and to further the individual's adjustment to successful community engagement including:

- Comprehensive assessment of cognitive strengths and liabilities, quality of adjustment and behavioral functioning
- Development and implementation of cognitive and behavioral strategies
- Development of a structured cognitive/behavioral intervention plan
- Ongoing or periodic consultation with the waiver participant, support system and providers concerning cognitive and behavioral strategies and interventions specified in the cognitive/ behavioral intervention plan
- Ongoing or periodic assistance with training of the waiver participant, support system and providers concerning cognitive behavior strategies and interventions
- Periodic reassessment and revision as needed, of the cognitive/behavioral intervention plan.

This service is performed within the context of the individual's person-centered team, in concert with the case manager. Cognitive/behavioral programs may be provided in the individual's home or in the community in order to reinforce the training in a real-life situation.

The service will be delivered utilizing two procedure codes, one for in person face to face visits that include the participant, providers and/or supporters. A quarterly, in person meeting with the waiver participant is required for this service.

The second procedure code is for non-face-to-face service that includes development of the cognitive behavioral plan and phone or other types of interactions with participants, providers or supporters.

Provider Qualifications: **Agency:** CARF certification in Brain Injury, or JCAHO, or Accreditation for Behavioral Health Care; Employ individual who meet qualifications below.

Individual: Professional licensed as any of the following with at least three years of experience in cognitive/behavioral programming for people with a brain injury, delivered in community settings:

- | | | |
|----------------------|----------------|-----------------------|
| • Behavior Analysts | • Occupational | • Educational |
| • Psychologists | therapists | Psychologists |
| • Neuropsychologists | | • Speech therapists |
| | | • Physical therapists |

Training requirement (if not proven as part of educational record):

Attend the **ABI Basic Information Session** and pass the associated quiz with a grade of 80 or higher.

- Provider will have completed an approved training program(s) concerning acquired brain injury and person-centered planning, given by a state agency, the fiduciary, community providers, Brain Injury Alliance of CT, or an Independent Living Center prior to providing services to a ABI Waiver Program participant.

Connecticut State Department of Social Services

(DSS)

[CT.gov Home](#) / [Department of Social Services](#) / [DSS](#) DSS Commissioner Barton Reeves Announces New Leads to DSS Policy Team

Press Releases

07/12/2023

DSS Commissioner Barton Reeves Announces New Leads to DSS Policy Team



The State of Connecticut Department of Social Services

FOR IMMEDIATE RELEASE

July 12, 2023

Contact: Giovanni Pinto

(860) 424-5382

COMMISSIONER BARTON REEVES ANNOUNCES NEW LEADS TO DSS POLICY TEAM

(HARTFORD, CT) – Commissioner Andrea Barton Reeves is excited to announce the addition of two long-time public servants to lead the Department of Social Services' (DSS) Policy Team.

- **Dr. Mehul Dalal** - will serve as the Chief Policy Advisor
- **Joel Norwood** - will serve as the Deputy Chief Policy Advisor

"Dr. Dalal and Mr. Norwood will make invaluable additions to the DSS Policy Team, offering a breadth of knowledge spanning decades of community-based services involving the health and human service needs of our most vulnerable populations.

For the last three-and-a-half years, Dr. Dalal served as the Community Services Administrator for the City of New Haven and guided the city through their COVID-19 pandemic response, launched their mental health response team – COMPASS, and established the state's first municipal Office of Violence Prevention, among other feats.

Mr. Norwood has been with DSS for over a decade as a staff attorney and has worked to improve Medicaid expansion coverage, COVID-19 flexibilities, and coverage of autism spectrum disorder services. In addition, he led the agency's negotiations in a multi-billion-dollar settlement agreement with the state's private hospitals.

I am excited for the privilege to facilitate collaborative work between Dr. Dalal and Mr. Norwood as I know the both of them will utilize their expertise to craft meaningful policies that will provide high-quality services to Connecticut families," **Commissioner Barton Reeves** said.

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Fw: Subject: Comprehensive Inquiry: Referral Process, Provider List, and Care Manager's Role

ABI RESOURCES 860 942-0365 <aabiwr@live.com>

Fri 3/24/2023 10:25 AM

To: ABI Resources HIPAA Secure Correspondence www.CTBRAININJURY.com <abi@ctbraininjury.com>; LAURA C (ABI SUPPORT SUPERVISOR) <laura.c@ctbraininjury.com>; CHRISTINE G (ABI SUPPORT SUPERVISOR) <christine.g@ctbraininjury.com>

All the best,
David Medeiros CBIS



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ABI Resources Connecticut home-based supported living and community care services for the MFP, ABI and PCA Waivers.

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From: ABI RESOURCES 860 942-0365 <aabiwr@live.com>

Sent: Wednesday, March 22, 2023 1:08 PM

To: erin.kane@ctcommunitycare.org <erin.kane@ctcommunitycare.org>

Subject: Re: Subject: Comprehensive Inquiry: Referral Process, Provider List, and Care Manager's Role

Dear Erin,

I am writing to express our deepening concerns over the lack of response to ABI Resources' inquiry regarding Connecticut Community Care's referral process. As a provider of services to the brain injury population, we are committed to ensuring that individuals with disabilities have full access and receive the care and services they need to thrive.

We recognize that you and your team may be facing many challenges, and we urge you to prioritize ABI Resources' inquiry. The lack of communication is raising serious doubts about the reliability of information and responsiveness of your organization, and this is creating significant new concerns.

We cannot overemphasize the importance of ensuring that Medicaid consumers of the above programs have full and complete access to ABI Resources services.

We are committed to working together with you and your organization to improve the lives of individuals with disabilities. We urge you to respond to our inquiries and to work with ABI Resources to address any concerns or issues that may arise.

Thank you for your attention to this matter, and we look forward to hearing from you soon.

Sincerely,

David Medeiros



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From: ABI RESOURCES 860 942-0365 <aabiwr@live.com>

Sent: Friday, March 17, 2023 5:43 AM

To: erin.kane@ctcommunitycare.org <erin.kane@ctcommunitycare.org>

Subject: Subject: Comprehensive Inquiry: Referral Process, Provider List, and Care Manager's Role

Dear Erin,

Thank you for your prompt and informative response to my inquiry about Connecticut Community Care's referral process. I appreciate the detailed explanation you provided and the clarification on the provider selection criteria.

I understand that Amy Dumont from DSS will be able to address my questions regarding documentation and eligibility. I look forward to her input on these matters.

In the meantime, I have some additional questions for you. Can you please elaborate on the electronic randomization process used for provider selection when a client does not indicate a preference? I am curious to learn more about how the system works to ensure a fair distribution of referrals. I have a few additional questions to help me better understand the referral system:

Provider List:

- a. Approximately how many agency providers are currently in the Connecticut Community Care referral system? Understanding the number of providers in the system will give me a better idea of the diversity and range

of options available to clients.

- b. Who provides Connecticut Community Care with the list of agency providers included in the referral system? Is there a specific department or organization responsible for maintaining and updating the list of providers?
- c. How often is the list of agency providers updated? Is there a regular schedule or is it updated on an as-needed basis?
- d. How may we ensure that ABI Resources is listed within the system for all areas and services? May I see how ABI Resources is listed within your system?

Electronic System:

- a. What is the name of the electronic system used for randomizing provider selection when a client does not indicate a preference?
- b. Can you please elaborate on the electronic randomization process used for provider selection to ensure a fair distribution of referrals?
- c. Who is responsible for managing the referral system and ensuring its smooth operation? Is there a specific department or organization responsible for maintaining and updating the list of providers?
- d. Could you please elaborate on how the selected provider is presented to the care manager? Additionally, how is this selection subsequently presented to the client? Are there specific steps or protocols followed to ensure clients are fully informed and understand their options?

Regarding the role of care managers in the process:

- a. What is the care manager's role in presenting agency providers, such as ABI Resources, to clients during the referral process?
- b. How do they ensure that clients are well-informed and make the best choice based on their needs and preferences?
- c. Do all care managers have access to the electronic system used for provider selection? If so, are they able to operate the system independently, or is there a specific protocol they must follow? Could you please elaborate on the level of involvement and autonomy care managers have when utilizing the electronic system during the referral process?

I want to take a moment to emphasize how much we value the information you have provided and will continue to provide about Connecticut Community Care's referral process. This knowledge not only helps ABI Resources better navigate and understand the system, but it also enables us to more effectively serve the brain injury population.

By comprehending the intricacies of the referral process, we can work closely with care managers, adapt our services to meet clients' specific needs, and ensure that clients are presented with the most accurate and relevant information about ABI Resources. This collaborative approach is essential in empowering clients to make informed decisions about their care, which ultimately contributes to better outcomes for those affected by brain injuries.

Once again, thank you for your ongoing assistance and dedication to helping us serve the brain injury community more effectively.

Understanding the involvement of care managers in the process will help us better collaborate with them and support clients effectively. Your insights are greatly appreciated, I look forward to your response and any additional insights you can provide on this topic.

All the best,
David Medeiros



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9 months -- Care Management Neglect of Historical Information Sharing with CBT Behaviorist for ABI Waiver Program Survivor EB

ABI RESOURCES 860 942-0365 <aabiwr@live.com>

Fri 9/1/2023 6:47 AM

To: Commis DSS <commis.dss@ct.gov>; Amy Dumont <amy.dumont@ct.gov>

Cc: ABI RESOURCES 860 942-0365 <aabiwr@live.com>

Date: August 31, 2023

To: Connecticut Department of Social Services (DSS)

From: ABI Resources

The ABI Waiver Program aims to assist individuals with Acquired Brain Injuries, facilitating their integration into community settings and ensuring they lead self-directed lives. Central to this program's success is the transparent exchange of information by Care Management to all involved professionals.

Report of the Meeting:

During a recent team meeting for ABI Waiver Program survivor EB from Griswold, CT, the CBT behaviorist highlighted the following concern:

In the past 9 months of providing weekly therapy services to EB since January, the behaviorist did not receive any historical behavioral or background information about EB from Care Management.

The absence of information from Care Management poses questions about the necessity and justification of the weekly ABI Waiver behavioral services being provided and billed to Medicaid. How can a behaviorist deliver effective services without prior knowledge or specific directives?

During this meeting, the Care management explained they had no information about the consumer but would look at the client's records next week when they go to the office, the behaviorist then approached ABI Resources for past and current medical and therapeutic data. However, ABI Resources provides non-medical/therapeutic support, potentially complicating the behaviorist's request.

The Cognitive Behavioral therapist raised concerns to the consumer and team about the consumer's lead medical rehab doctor's abilities and prescriptions. Such concerns have unsettled the consumer, making them contemplate seeking a new prescriber and potentially not adhering to their medication regimen. Notably, EB has been with their current doctor for over 15 years.

Implications:

Program Integrity: ABI Waiver care management consultation services are built on organization thorough information sharing and communication. A lapse in this

regard undermines the quality of care as well as concerns for Care management consultation service billing that may not be provided.

Consumer Safety: Operating without a complete background can endanger the consumer, therapist, and service providers.

CBT Medication Concerns: Uncertainties regarding EB's medication necessitate immediate investigation and resolution.

Concerns Raised:

Clarity is required on the interventions the CBT behaviorist has employed with EB since January. The obstacles created by the missing historical data and the highlighted medication worries are urgent.

Request for Action:

Immediate Sharing of Information: Care Management must swiftly relay all pertinent historical details about EB to the CBT behaviorist and ABI Resources.

Audit of Care Management Protocols: An assessment should be initiated to discern the cause of this neglect and avert similar oversights for other clients.

Training: Provide comprehensive training for Care Management consultation services and behavioral providers to ensure an understanding of the roles and capacities of each associated organization.

Contact CMS: Initiate a thorough investigation into the consumer's ABI Waiver Program service plan and to ascertain if other consumers are experiencing similar.

Ensuring the concerns detailed herein are swiftly addressed is critical to preserving safety as well as the integrity and purpose of the ABI Waiver Program.

We urge Connecticut DSS to prioritize this matter and ensure proper measures are taken to rectify the situation. Lastly, ABI Resources requests follow-up information as to how the Department of Social Services has addressed this.

Sincerely,

David Medeiros

ABI Resources

RE: Commissioner regarding Medicaid ABI Waiver 1:

Dumont, Amy E <Amy.Dumont@ct.gov>

Tue 8/29/2023 10:06 AM

To: ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>; DSS, Commis <Commis.DSS@ct.gov>; ABI Resources HIPAA Secure Correspondence www.CTBRAININJURY.com <ABI@CTBRAININJURY.COM>

Good morning David! There has been no change in policy or program guidelines. Pursuant to section 17b-260a-11(a)(1) of the Department's ABI Waiver Operational Policy effective July 1, 2016, "[t]o the extent feasible, the individual shall lead the person-centered planning process. If the individual has a legal representative, the legal representative may participate in the planning process, making decisions for the individual, as necessary to ensure the best interests of the individual." As such, there may be, and often are, circumstances in which an individual, or an individual's representative, in consultation with the care manager, decide not to attend a particular meeting. This decision remains in the discretion of the individual and/or their representative, as part of the person-centered planning process, rather than that of any providers who may also be participating in a meeting.

Please let me know if you have any additional questions.

Amy

Amy Dumont, LCSW
Interim Director/Program Manager
CT Department of Social Services
Community Options Unit
55 Farmington Avenue
Hartford CT 06105-3725
Tel: 860 424-5173
Fax: 860 424:4963
amy.dumont@ct.gov

From: ABI RESOURCES 860 942-0365 <AABIWR@LIVE.COM>

Sent: Monday, August 28, 2023 11:58 AM

To: DSS, Commis <Commis.DSS@ct.gov>; ABI Resources HIPAA Secure Correspondence www.CTBRAININJURY.com <ABI@CTBRAININJURY.COM>

Cc: Dumont, Amy E <Amy.Dumont@ct.gov>

Subject: Re: Commissioner regarding Medicaid ABI Waiver 1:

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Subject: Immediate Attention Required: Clarification on Medicaid ABI Waiver 1 Meeting Protocols

Dear Commissioner [Commissioner's Last Name],

I hope this message finds you in good health and high spirits. I am reaching out with great urgency concerning the email sent by Mr. David Medeiros on behalf of ABI Resources. Our correspondence addresses pivotal concerns regarding the Medicaid ABI Waiver 1 meeting protocols.

Given the importance and the potential ramifications of the matter at hand, we stress the importance of a swift and comprehensive response to our query. The inclusion or exclusion of consumers in their respective Medicaid ABI