

Conduct an Independent Audit:

Hire an independent entity to conduct a thorough review of the Medicaid referral processes within the ABI Waiver Program to identify any biases or unfair practices.

The audit should also evaluate the performance and quality of services provided by ABI Resources and other service providers to ensure that referrals are based on merit and the ability to meet the needs of individuals with acquired brain injuries.

Implement a Fair and Equitable Referral System:

Develop a standardized and objective referral system that ensures all service providers are evaluated based on the same criteria.

Consider incorporating a randomized component to the referral process to prevent bias and ensure a fair distribution of referrals.

Engage Stakeholders:

Create a platform for open dialogue between Medicaid officials, service providers, individuals with acquired brain injuries, and their families to discuss concerns related to the referral process.

Use feedback from stakeholders to continuously improve the referral system and address any emerging issues.

Provide Training and Education:

Offer training to Medicaid officials and other stakeholders involved in the referral process to raise awareness about potential biases and the importance of a fair and equitable system.

Educate service providers about the referral process, criteria for referrals, and steps they can take if they believe they have been treated unfairly.

Establish a Complaint and Appeal Process:

Create a clear and accessible complaint and appeal process for service providers who believe they have been unfairly marginalized in the referral process.

Ensure that complaints are thoroughly investigated and that corrective action is taken when warranted.

Promote Accountability:

Hold Medicaid officials and other stakeholders accountable for ensuring a fair and transparent referral process.

Implement consequences for individuals or entities found to be engaging in biased or unfair practices.

Regularly Review and Update Policies:

Conduct regular reviews of referral policies and procedures to ensure they remain up-to-date, fair, and transparent.

Update policies as needed to address any identified issues and to adapt to changing needs and circumstances.

Addressing the issues of transparency, bias, and unfair marginalization in Medicaid referrals within the ABI Waiver Program is essential to ensuring that all eligible individuals have equal access to high-quality services. It is imperative that service providers like ABI Resources are treated fairly and equitably in the referral process to uphold the integrity of the healthcare system and to foster trust among all stakeholders. Implementing the above steps could contribute significantly to creating a more transparent, fair, and equitable referral system, ultimately benefiting individuals with acquired brain injuries and the service providers dedicated to supporting them.

b) Paying Consumers / Financial Incentives Inducements / Medicaid Service Agency

Provider: A Medicaid service agency provider is offering financial incentives to consumers, leading to an imbalance in the competitive landscape. This kind of practice can indeed raise serious ethical, legal, and fairness concerns.

Ethical Concerns:

Conflicts of Interest: Financial incentives could create a conflict of interest, where the provider's financial gain takes precedence over the best interests of the consumer.

Bias and Unfairness: It could lead to bias in referrals, favoring certain providers over others irrespective of the quality of services they offer.

Erosion of Trust: Such practices can erode trust in the Medicaid system and healthcare providers, as consumers may question the motives behind the services they are being referred to.

Legal Concerns:

Violation of Anti-Kickback Statutes: Providing inducements to influence the referral of services covered by Medicaid can violate anti-kickback statutes, potentially leading to legal actions and penalties.

False Claims Act Violations: If such inducements lead to fraudulent billing or claims, it could result in violations of the False Claims Act.

Non-Compliance with Medicaid Regulations: Medicaid has strict guidelines and regulations to ensure fairness and prevent fraud, and engaging in such practices can result in non-compliance and potential debarment from the program.

Lack of Responsiveness to Complaints and Reports: Our persistent complaints and reports, meticulously documenting these issues, have been met with apathy. There is an alarming deficit in the investigation, redressal, and accountability mechanisms within the system.

Adverse Impacts on ABI Resources:

Financial Duress: The discriminatory practices and referral shortages have placed ABI Resources under significant financial duress, compromising our ability to maintain operational viability and deliver superior services to our clients.

Reputational Harm: The state's nonintervention and perceived partiality have led to an erosion of our reputation. This has resulted in ABI Resources being unjustly perceived as a less favorable service provider, regardless of our commitment to quality and excellence.

Demoralization of Workforce: The protracted nature of these issues has led to a pervasive sense of demoralization among our staff and stakeholders, adversely impacting the morale and efficacy of our organizational operations.

Addressing the Issue:

Regulatory Oversight: There should be strict oversight and monitoring by regulatory bodies to ensure that all Medicaid service agency providers are complying with laws and regulations.

Transparency: Increasing transparency in the referral process can help in ensuring that referrals are made based on the quality of services rather than financial incentives.

Whistleblower Protections: Encouraging whistleblowing and providing protections for whistleblowers can help in uncovering and addressing such unethical practices.

Penalties and Sanctions: Implementing strict penalties and sanctions for those found guilty of engaging in such practices can act as a deterrent.

Public Awareness: Educating consumers about the potential for such conflicts of interest and providing them with information on how to report suspicious activities can empower them to make informed decisions.

Addressing this issue is crucial for maintaining the integrity of the Medicaid program, ensuring that consumers receive the best possible care, and fostering a competitive and fair marketplace for healthcare services.

Call to Action:

I earnestly seek your prompt intervention and advocacy in ensuring this grievance is communicated to all pertinent departments within the state of Connecticut tasked with addressing such critical matters. The departments that ought to be immediately apprised of this situation include, but are not limited to:

Connecticut Department of Social Services

Connecticut Attorney General's Office

Connecticut Commission on Human Rights and Opportunities

Connecticut Office of the Healthcare Advocate

Connecticut Office of Policy and Management

I have proactively initiated complaints and have directly engaged with the Connecticut Department of Social Services. Rest assured, all communications have been meticulously documented, encompassing dates, times, and the identities of the individuals engaged in these discussions.

I place my trust in your unwavering commitment to justice and fairness, confident that you will accord this matter the urgency and gravitas it demands, ensuring a

comprehensive investigation and the implementation of corrective measures. The equitable treatment of all service providers operating under the Connecticut Medicaid ABI Waiver Program is of utmost importance, and I am optimistic that your intervention will usher in a just resolution.

I am grateful for your time and thoughtful consideration of this crucial matter.

Sincerely,

David Medeiros

Best regards,

David Medeiros

David Medeiros
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11/13/2023

Subject: Formal Grievance Complaint Concerning Connecticut Medicaid ABI Waiver Program Service and Intervention Plans.

To: All pertinent departments within the state of Connecticut,

I am writing on behalf of ABI Resources, a dedicated provider of essential services to individuals with acquired brain injuries (ABI). This letter serves to formally raise a grievance and file a complaint concerning the serious issue of not receiving Medicaid Acquired Brain Injury (ABI) Waiver Program service and intervention plans from consumer-assigned care management consultants. This situation has gravely impacted the operational and financial integrity of ABI Resources.

As per the stipulations of the ABI Waiver Program, a "Service Plan" is an essential document that outlines the necessary medical and community-based services enabling individuals to live outside institutional settings. The provision of individualized service plans include measurable goals, objectives, and documentation of total service costs.

Additionally, "Intervention Plans," developed by cognitive behaviorists, are crucial in identifying and managing treatment goals and interventions for our



clients. However, despite our repeated efforts and adherence to the required protocols, we have not received these vital documents from care management. The lack of these plans has led to significant operational and financial difficulties for ABI Resources.

Sec. 17b-260a-6. Person-centered planning process (a) The service plan shall be developed based on a person-centered planning model, as described in 42 CFR 441.301(c), as amended from time to time. The individual shall lead the planning process where possible, and in accordance with section 17b-260a-11(a) of the Regulations of Connecticut State Agencies.

6) Prohibit providers of waiver services for the individual, or those who have an interest in or are employed by a provider of waiver services for the individual, from providing care management or participating in the development of the person-centered service plan;

Key Concerns and Grievances:

Non-Receipt of Essential Documents: Despite adherence to protocol, ABI Resources has not received the mandated individualized service and intervention plans, which include measurable goals and objectives for the consumers we serve. Furthermore, the necessary intervention plans developed by cognitive behaviorists, which outline treatment goals and interventions, have also not been provided by care management.

Concerns: Impact on Daily Support Staff and Program Consumers

In addition to the aforementioned issues, the absence of these critical Medicaid ABI Waiver Program plans has significantly affected our daily support staff and, consequently, the consumers of the program.

Impact on Daily Support Staff:

Lack of Clear Direction: Without structured plans, staff members struggle to provide focused and effective services, as they lack clear guidelines and objectives.

Increased Workload and Stress: The ambiguity surrounding treatment goals and methods has led to an increased workload and heightened stress levels among staff, impacting their well-being and job satisfaction.

Professional Inefficiency: Staff are unable to utilize their skills and training effectively, leading to professional dissatisfaction.

Difficulty in Tracking Progress: The absence of measurable goals makes it challenging for staff to track and report on client progress accurately.

Risk of Non-Compliance: Without proper guidelines, there is an increased risk of non-compliance with regulatory standards, potentially leading to legal and ethical issues.

Reduced Team Morale: The overall uncertainty and increased challenges have adversely affected team morale and cohesion.

Impact on Consumers of the Program:

Inconsistent Service Quality: Consumers face variability in the quality of care received, as staff members lack consistent plans to guide their services.

Slowed Progress: The absence of structured goals and interventions can slow down or hinder the progress and rehabilitation of consumers.

Reduced Confidence in Services: Consumers and their families may lose confidence in the quality and effectiveness of the services provided.

Increased Vulnerability: Consumers, particularly those with severe conditions, become more vulnerable due to the lack of tailored, goal-oriented care.

Potential for Unmet Needs: Without specific plans, some needs of consumers may remain unidentified and unaddressed, leading to gaps in care.

Emotional and Psychological Impact: The inconsistency and uncertainty in care can have adverse emotional and psychological effects on consumers.

These challenges not only make the daily responsibilities of our care providers more arduous but also critically undermine the quality of care and support we can offer to our consumers. It is imperative that these issues be addressed immediately to ensure the well-being of both our staff and the consumers who rely on our services.

Adverse Impacts on ABI Resources:

The cumulative effect of these issues has placed ABI Resources in a precarious financial and operational position.

Financial Losses: The absence of these critical documents has led to substantial financial losses, severely hampering our ability to function effectively.

Staffing Challenges: The lack of structured plans has created many challenges for our service providers and as a result, we have faced significant staffing issues, including layoffs and the challenges to maintain essential personnel.

Client Impact: Our capacity to offer consistent and high-quality services has been compromised, leading to a loss of clients and a tarnishing of our reputation.

Administrative Burden: The lack of structured plans has resulted in an increased administrative load, as we strive to manage without proper guidance.

Overall Business Impact: These compounded issues threaten the viability of ABI Resources and our mission to serve those in need.

Potential Steps to Address the Issue:

Immediate Investigation: We request a prompt investigation into this matter.

Provision of Required Plans: We urge for the immediate provision of the required service and intervention plans.

Compensation for Losses: Guidance on how to claim losses incurred due to this oversight and a discussion on potential compensatory measures are necessary.

Support and Guidance: Additional support to help navigate and rectify this situation would be invaluable.

Addressing the Issue:

We have initiated complaints and engaged directly with the Connecticut Department of Social Services. All communications have been thoroughly documented.

Call to Action:

I earnestly seek your prompt intervention and advocacy in ensuring this grievance is communicated to all pertinent departments within the state of Connecticut tasked with addressing such critical matters. The departments that ought to be immediately apprised of this situation include, but are not limited to:

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Connecticut Commission on Human Rights and Opportunities

Connecticut Office of the Healthcare Advocate

Connecticut Office of Policy and Management

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I place my trust in your unwavering commitment to justice and fairness, confident that you will accord this matter the urgency and gravitas it demands, ensuring a comprehensive investigation and the implementation of corrective measures. The

equitable treatment of all service providers operating under the Connecticut Medicaid ABI Waiver Program is of utmost importance, and I am optimistic that your intervention will usher in a just resolution.

I am grateful for your time and thoughtful consideration of this crucial matter.

Best regards,

David Medeiros

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11/15/2023

Subject: Formal Grievance and Complaint Regarding the Concealment of Public Information: Medicaid ABI Waiver Program Directory of Providers.

To: All pertinent departments within the state of Connecticut,

I am writing on behalf of ABI Resources to express our formal grievance and file a complaint regarding the handling of the Medicaid Acquired Brain Injury (ABI) Waiver Program by the Connecticut Department of Social Services (DSS). Specifically, our complaint centers on the apparent concealment of the Medicaid ABI Waiver Program Directory of Providers, a critical public resource.

Key Concerns and Grievances:

- a) Denial of Public Access to Information: The DSS managed Medicaid ABI Waiver Program Directory of Providers is public information, rightfully accessible to all. Its concealment not only violates the principles of transparency and public service but also directly impacts those in dire need of these services.
- b) Inaccessibility to Vulnerable Populations: The absence of accessible information severely restricts the ability of individuals with acquired brain

injuries, their families, and caregivers to make informed decisions regarding care and support. This lack of access is particularly detrimental, given the complex needs of this population.

- c) Increased Risk and Exploitation: Without knowledge of accredited and reputable providers, vulnerable individuals are at a heightened risk of exploitation and subpar services, which can lead to adverse health outcomes.
- d) Unnecessary Strain on Families and Caregivers: Families and caregivers, already burdened with care responsibilities, face additional challenges in finding appropriate services, contributing to increased stress and potential caregiving errors.
- e) Financial and Operational Impact on ABI Resources: As a provider, ABI Resources has suffered considerable financial losses due to decreased client engagement and an increased administrative burden. This situation stems directly from the unavailability of the provider directory, which hinders our ability to efficiently connect with potential clients.
- f) Administrative Burdens and Resource Diversion: The lack of a central, accessible directory has led to an excessive administrative load, diverting critical resources from our core mission of providing care.

Proposed Solutions and Steps to Address the Issue:

- 1) Immediate Disclosure and Accessibility: We request the immediate release of the Medicaid ABI Waiver Program Directory of Providers, ensuring it

is readily accessible to all stakeholders, particularly the public and vulnerable populations.

- 2) Commitment to Transparency: The DSS should commit to ongoing transparency in all aspects of the ABI Waiver Program, including regular updates and easy access to all program-related information.
- 3) Constructive Dialogue and Rectification: ABI Resources seeks to engage in a constructive dialogue with the DSS to discuss the implications of this concealment and explore potential avenues for rectifying the financial and operational impacts.

Addressing the Issue:

We have initiated complaints and engaged directly with the Connecticut Department of Social Services. All communications have been thoroughly documented.

Potential Steps to Address the Issue:

Immediate Investigation: We request a prompt investigation into this matter.

Provision of Required Plans: We urge for the immediate provision of the required service and intervention plans.

Compensation for Losses: Guidance on how to claim losses incurred due to this oversight and a discussion on potential compensatory measures are necessary.

Support and Guidance: Additional support to help navigate and rectify this situation would be invaluable.

Call to Action:

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Connecticut Office of Policy and Management

I have proactively initiated complaints and have directly engaged with the Connecticut Department of Social Services. Rest assured, all communications have been meticulously documented, encompassing dates, times, and the identities of the individuals engaged in these discussions.

We urge the Connecticut Department of Social Services, alongside the Attorney General's Office, the Commission on Human Rights and Opportunities, the Office of the Healthcare Advocate, and the Office of Policy and Management, to address this grievance promptly. The issue at hand not only affects ABI Resources but also speaks to the larger matter of public trust and the accessibility of crucial healthcare information.

We anticipate a constructive and swift response to this urgent matter, underscoring the importance of transparency and accessibility in public services, especially those catering to vulnerable populations.

I place my trust in your unwavering commitment to justice and fairness, confident that you will accord this matter the urgency and gravitas it demands, ensuring a comprehensive investigation and the implementation of corrective measures. The equitable treatment of all service providers operating under the Connecticut Medicaid ABI Waiver Program is of utmost importance, and I am optimistic that your intervention will usher in a just resolution.

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11/16/2023

Subject: Formal Complaint and Request for Immediate Clarification on
Unauthorized Care Management Consultation Services in ABI Waiver Program 1.

To: All pertinent departments within the state of Connecticut,

Connecticut Department of Social Services and Relevant Oversight Bodies

I am writing on behalf of ABI Resources to express grave concerns and urgently seek detailed clarification on practices we have observed within the Medicaid Acquired Brain Injury (ABI) Waiver Program, particularly in ABI Waiver Program 1. Our complaint specifically focuses on what appears to be an unauthorized provision of care management consultation services in Program 1, a practice traditionally and explicitly designated for Program 2 under existing guidelines. This letter outlines our observations, the potential negative impacts on our business operations and our consumers, and our urgent requests for resolution

Key concerns and grievances:

1. Unauthorized Consultation Services: The core of our concern lies in the apparent provision of care management consultation services to consumers in ABI Waiver Program 1. This practice is not authorized under the current program guidelines and represents a significant breach of protocol,



raising serious concerns about compliance and oversight within the program.

2. Lack of Clarity and Transparency in Program Administration: The sudden and unexplained introduction of these services in Program 1 has created an atmosphere of confusion and uncertainty. We seek immediate and detailed clarification from the Department on whether there have been any recent changes to the scope or administration of ABI Waiver Program 1 that would authorize such services.
3. Improper Recommendations for Program Transitions: Additionally, we have noted instances where care managers are inappropriately advising Program 1 consumers to transition to Program 2. This advice, given without proper authority or assessment, potentially disrupts the tailored care plans crucial for the recovery of individuals with acquired brain injuries.

In-Depth Analysis of Impact on ABI Resources and Consumers:

1. Operational and Strategic Challenges: The introduction of potentially unauthorized services has disrupted our strategic planning and operational execution. It has forced us to reevaluate our service delivery models and resource allocation, potentially leading to inefficiencies and diminished care quality.
2. Risk to Consumer Trust and Quality of Care: The ambiguity surrounding these services risks damaging the trust that consumers and their families have in the system. It raises concerns about the appropriateness of care

provided, which is essential for effective recovery and rehabilitation in ABI cases.

3. Market Imbalance and Competitive Disadvantage: This situation creates an unfair market environment. Providers adhering to the guidelines may be at a disadvantage compared to those who are offering these additional, potentially unauthorized services. This not only affects our competitive position but also skews the overall market dynamics in ABI care services.

Specific Requests for Resolution and Enhanced Transparency:

1. Comprehensive Investigation and Clear Communication: We request an immediate, comprehensive investigation into the provision of care management consultation services in ABI Waiver Program 1, accompanied by clear communication on any policy adjustments.
2. Immediate Enforcement of Compliance: We urge the prompt enforcement of existing program guidelines and the cessation of any unauthorized practices.
3. Proactive Support and Guidance for All Stakeholders: We advocate for the development of support and guidance initiatives for both service providers and consumers to navigate these changes effectively, ensuring everyone is fully informed about their rights and the services available.
4. Corrective Measures for Non-Compliance: Implementation of corrective actions, including disciplinary measures, against entities found in violation of program rules, to maintain the integrity and effectiveness of the program.

Conclusion:

ABI Resources is deeply committed to providing high-quality care within the ABI Waiver Program framework. The current situation, marked by potential unauthorized practices, poses significant challenges to our operations and the well-being of our consumers. We trust that the Connecticut Department of Social Services and relevant oversight bodies will address these issues with the urgency and thoroughness they demand, ensuring the program's integrity and efficacy. We look forward to a swift, detailed, and transparent response to this critical issue.

Call to Action:

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We anticipate a constructive and swift response to this urgent matter, underscoring the importance of transparency and accessibility in public services, especially those catering to vulnerable populations.

I place my trust in your unwavering commitment to justice and fairness, confident that you will accord this matter the urgency and gravitas it demands, ensuring a comprehensive investigation and the implementation of corrective measures. The equitable treatment of all service providers operating under the Connecticut Medicaid ABI Waiver Program is of utmost importance, and I am optimistic that your intervention will usher in a just resolution.

I am grateful for your time and thoughtful consideration of this crucial matter.

Best regards,

David Medeiros

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11/16/2023

Subject: Formal Complaint Regarding Unethical Practices and Possible Kickback Schemes in ABI Waiver Program.

To: All pertinent departments within the state of Connecticut,

I am David Medeiros from ABI Resources, and I present this document to voice our serious concerns about certain activities within the Medicaid Acquired Brain Injury (ABI) Waiver program. These activities, which appear to breach ethical standards and potentially violate Medicaid regulations, require immediate scrutiny and action.

Examination of the ABI Waiver Program's Framework:

The ABI Waiver Program, established under sections 17b-260a-1 to 17b-260a-17 of the Connecticut State Agencies regulations, is designed to offer nonmedical, home, and community-based services to eligible individuals with an ABI. This program emphasizes the need for cost-effective services, personalized care, and adherence to strict qualifications for providers, ensuring that the services provided meet the highest ethical and professional standards.

Conflicts Arising from Service Provision:

Dual Service Conflict:

In the context of the ABI Waiver Program, a significant conflict has emerged due to an agency providing both Clinical Behavioral Therapy (CBT) and daily non-medical services to the same group of consumers. This situation raises several concerns:

Therapeutic Recommendations Overlapping with Financial Interests:

There is an apparent alignment of therapeutic recommendations with the agency's financial interests. The agency uses the platform of CBT sessions to recommend additional non-medical services that it also provides. This practice suggests a dual benefit for the agency, where it gains financially from both therapy sessions and the subsequent non-medical services.

Influence on Consumer Choice:

The dual role of the agency potentially influences consumer choice, where therapeutic sessions, which should be neutral and solely in the interest of the Consumer's health, may be used to steer consumers towards additional services provided by the same agency. This situation can lead to biased recommendations that may not always be in the best interest of the consumer.

Cycle of Service Provision and Financial Gain:

There is a creation of a cycle wherein the agency, through its provision of CBT, identifies or creates a need for additional services, fulfills these needs through its non-medical services arm, and consequently benefits financially. This cycle raises questions about the objectivity of the service recommendations and the potential for unnecessary or excessive services being provided.

Potential for Overutilization of Services:

This overlap in services could lead to overutilization, where consumers receive more services than are necessary, leading to increased costs for the Medicaid program.

Ethical Implications:

The practice blurs the lines between therapeutic need and financial gain, potentially compromising the ethical standards expected in healthcare and social service provision.

These concerns necessitate a thorough examination to ensure that services provided under the ABI Waiver Program are free from conflicts of interest, maintain the highest ethical standards, and truly serve the best interests of the consumers.

Manipulative Consumer Steering and Personnel Poaching:

Directing Consumer Choices:

The conduct of the agency's Clinical Behavioral Therapy (CBT) providers has raised significant concerns regarding the manipulation of Consumer choices. This issue manifests in several ways:

Targeted Referrals:

CBT providers are reportedly channeling consumers towards the agency's own non-medical services. This practice goes beyond the realm of impartial medical advice, as it systematically directs consumers to services that benefit the agency financially, rather than based on the unbiased assessment of Consumer needs.

Influence on Consumer Decision-Making:

This approach potentially undermines the autonomy of consumers in making informed decisions about their care. By directing consumers towards specific services, there's a risk that consumers are being provided a narrowed view of available options, influenced more by the agency's financial interests than by Consumer welfare.

Questionable Ethical Practices:

The behavior of these CBT providers raises ethical questions, particularly regarding the integrity of their recommendations. It potentially violates the principle of acting in the best interests of the Consumer, a cornerstone of healthcare and therapeutic professions.

Unfair Competitive Tactics:

The agency's practices extend beyond Consumer manipulation, affecting the broader operational dynamics within the industry:

Staff Poaching:

Reports indicate that the agency has engaged in poaching staff from other providers. This action not only disrupts the operations of other agencies but also indicates a strategic approach to weaken competition and consolidate the agency's position in the market.

Disruption of Industry Standards:

Such tactics contribute to an uneven playing field, where ethical providers adhering to fair hiring practices are disadvantaged. This behavior can lead to a destabilization of the market, with one agency gaining undue advantage and influence.

Impact on Service Quality:

The poaching of staff may lead to a shortage of skilled professionals in other agencies, potentially affecting the quality of care and services provided to consumers across the industry.

These practices of manipulative Consumer steering and personnel poaching call for an in-depth review to ensure that the ABI Waiver Program operates in a fair, ethical, and competitive environment, where Consumer welfare and industry standards are upheld.

Indicators of Potential Kickback Arrangements:

Referral for Incentives:

The relationships and interactions among the service provider, Clinical Behavioral Therapy (CBT) professionals, and care management consultants reveal possible mechanisms of kickback arrangements. This is characterized by:

Questionable Referral Patterns:

There appears to be a consistent pattern where CBT professionals and care management consultants funnel consumers to specific services offered by the agency. This pattern suggests a systematic approach to referrals that may not be solely based on Consumer needs but rather on underlying incentives.

Financial Incentives for Referrals:

The possibility that CBT professionals and care management consultants receive financial or other forms of incentives for directing consumers to the agency's services is a major concern. Such incentives could significantly compromise the

integrity of Consumer referrals, with decisions potentially driven by personal gain rather than Consumer welfare.

Cyclical Billing and Service Utilization:

The referral system seems to create a cyclical pattern of billing and service utilization, where Consumer needs are continuously identified and serviced within the same agency network, fostering an environment of repeated financial gain for the agency.

Impact on Medicaid Expenditures:

If these practices are occurring, they could lead to increased and potentially unnecessary Medicaid expenditures. Consumers may be receiving more services than medically necessary, or services that could be more effectively provided elsewhere, leading to inflated costs borne by the Medicaid program.

Ethical and Legal Implications:

Such kickback arrangements, if confirmed, would not only breach ethical standards but also could contravene legal statutes governing Medicaid and healthcare services. Kickbacks in healthcare are illegal and undermine the principle of fair competition and the integrity of patient care.

The existence of these indicators necessitates a thorough investigation to ascertain the presence of kickback arrangements and to evaluate their impact on the Medicaid program's ethical standards and financial integrity. It is imperative to ensure that all practices within the ABI Waiver Program align with legal and ethical guidelines, safeguarding the program's integrity and the wellbeing of its beneficiaries.

Impact on ABI Resources:

Revenue Reduction

Consumer Diversion Impact:

ABI Resources has experienced a significant downturn in revenue, which can be directly attributed to the diversion of consumers towards the agency in question. This diversion likely results from the alleged unethical steering and manipulative practices, leading to a reduced Consumer base for ABI Resources.

Financial Viability Threatened:

The reduction in revenue poses a threat to the financial viability and sustainability of ABI Resources, impacting our ability to provide quality care and services to our consumers.

Operational Cost Surge:

Increased Marketing Expenditures: In an effort to counteract the loss of consumers and to rebuild our Consumer base, ABI Resources has had to significantly increase our investment in marketing. These additional expenses are necessary to communicate our commitment to ethical practices and quality care to the community.

Legal and Consultation Fees:

Addressing these unethical practices and exploring legal avenues for recourse has led to increased spending on legal consultations and related services. These expenditures are essential for navigating the complexities of the situation and seeking justice, but they also divert resources from other operational areas.

Consumer Relationship Erosion:

Loss of Trust and Business: The most profound impact has been on our established Consumer relationships. The manipulative practices of the agency in question have led to a loss of trust among our consumers, as they are steered away from ABI Resources. This erosion of trust is deeply concerning, as it undermines the long-standing relationships we have built based on care, integrity, and ethical service provision.

Reputation Damage:

The wider implications of these practices in the industry have led to a tarnished reputation, not just for the agency in question, but for service providers in general, including ABI Resources. Restoring our reputation in the wake of these events is a significant challenge, requiring substantial effort and resources.

The cumulative effect of these impacts on ABI Resources is profound, affecting not just our financial stability but also our reputation and, most importantly, our ability to serve our consumers effectively. It is imperative that these issues are addressed comprehensively to restore the integrity of service provision within the ABI Waiver Program and to protect agencies like ours that are committed to ethical practices.

Formal Requests Thorough Examination and Compliance Review:

Comprehensive Investigation:

We formally request a complete and thorough examination of the outlined practices. This investigation should encompass all entities involved, including the service provider, CBT professionals, and care management consultants.

Medicaid Compliance Review:

A detailed review of Medicaid compliance is crucial to determine if these practices violate Medicaid regulations and standards.

Application of Corrective and Disciplinary Measures:

Immediate Corrective Action: Upon confirmation of these practices, we strongly advocate for swift implementation of corrective measures to address and rectify the identified issues.

Disciplinary Proceedings:

We also call for appropriate disciplinary actions against any parties found to be complicit in these unethical practices, in accordance with legal and regulatory guidelines.

Review and Revision of Policies and Oversight:

Policy Overhaul:

A comprehensive review and subsequent revision of existing policies within the ABI Waiver Program is necessary. This review should focus on closing loopholes that allow for such unethical practices and ensuring robust safeguards against future violations.

Enhanced Oversight Mechanisms:

We propose the establishment or enhancement of oversight mechanisms within the ABI Waiver Program to ensure ongoing compliance with ethical and legal standards.

In Closing:

The concerns we have raised in this document, if validated, point towards serious ethical lapses and potential legal infractions concerning Medicaid regulations. The very foundation of the ABI Waiver program, along with the trust placed in it by its beneficiaries, relies on prompt, effective, and transparent action from the Connecticut Department of Social Services.

We appreciate your attention to this urgent and significant matter and hope for a swift resolution that upholds the principles of justice and integrity.

Call to Action:

I earnestly seek your prompt intervention and advocacy in ensuring this grievance is communicated to all pertinent departments within the state of Connecticut tasked with addressing such critical matters. The departments that ought to be immediately apprised of this situation include, but are not limited to:

Connecticut Department of Social Services

Connecticut Attorney General's Office

Connecticut Commission on Human Rights and Opportunities

Connecticut Office of the Healthcare Advocate

Connecticut Office of Policy and Management

I have proactively initiated complaints and have directly engaged with the Connecticut Department of Social Services. Rest assured, all communications have been meticulously documented, encompassing dates, times, and the identities of the individuals engaged in these discussions.

We urge the Connecticut Department of Social Services, alongside the Attorney General's Office, the Commission on Human Rights and Opportunities, the Office of the Healthcare Advocate, and the Office of Policy and Management, to address this grievance promptly. The issue at hand not only affects ABI Resources but also speaks to the larger matter of public trust and the accessibility of crucial healthcare information.

We anticipate a constructive and swift response to this urgent matter, underscoring the importance of transparency and accessibility in public services, especially those catering to vulnerable populations.

I place my trust in your unwavering commitment to justice and fairness, confident that you will accord this matter the urgency and gravitas it demands, ensuring a comprehensive investigation and the implementation of corrective measures. The equitable treatment of all service providers operating under the Connecticut Medicaid ABI Waiver Program is of utmost importance, and I am optimistic that your intervention will usher in a just resolution.

I am grateful for your time and thoughtful consideration of this crucial matter.

Best regards,

David Medeiros

David Medeiros

ABI Resources , CEO, Director, Team Member

ABI Resources



Comprehensive Strategic Report for Enhancing the Connecticut Medicaid ABI Waiver Program

This comprehensive report outlines a strategic framework for enhancing the Connecticut Medicaid Acquired Brain Injury (ABI) Waiver Program. It encompasses a wide range of strategies, initiatives, and considerations aimed at improving the program's effectiveness and responsiveness to the needs of its beneficiaries. Below is a detailed compilation of the strategies discussed, organized into specific focus areas.

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Transformative Pathways: A Comprehensive Framework for the Connecticut Medicaid ABI Waiver Program

1. **Enhancing Care Transition and Discharge Planning:** Ensure smooth transitions for consumers with effective discharge planning and coordination with community services.
2. **Implementing Consumer-Driven Evaluation Models:** Incorporate consumer feedback directly into the evaluation process for continuous service adaptation.
3. **Prioritizing Mental Health and Cognitive Therapies:** Focus on mental health services and provide access to specialized mental health providers.
4. **Strengthening Advocacy for Policy Changes and Funding:** Engage in advocacy for beneficial policies and funding, collaborating with advocacy groups.
5. **Embracing a Culture of Compassion and Respect:** Promote a culture of compassion and respect within the program, ensuring respectful engagement with consumers and families.
6. **Advancing Technological Integration and Telehealth Services:** Utilize technology to enhance care delivery, including telehealth and innovative rehabilitation techniques.
7. **Building Resilient Support Systems for Consumers and Families:** Establish resilient support networks and provide family education and support programs.
8. **Developing Comprehensive Wellness Programs:** Implement holistic wellness initiatives and customized plans for physical, mental, and emotional health.
9. **Fostering Peer Support and Mentorship:** Facilitate peer support groups and mentorship programs for shared experiences and mutual support.
10. **Enhancing Accessibility to Emergency and Urgent Care Services:** Ensure quick access to emergency services and train staff in emergency response.
11. **Promoting Sustainable Practices and Environmental Health:** Incorporate sustainable practices in operations and educate on environmental health.
12. **Ensuring Continual Legal and Ethical Compliance Training:** Provide ongoing legal and ethical compliance training and updates on developments.
13. **Prioritizing Nutrition and Dietary Health:** Offer nutritional support services and education on healthy eating.
14. **Establishing a Robust Feedback and Complaint Resolution System:** Set up effective feedback mechanisms and a transparent complaint resolution process.
15. **Enhancing Physical Therapy and Rehabilitation Services:** Provide access to advanced rehabilitation services and innovative techniques.
16. **Integrating Art and Creative Therapies:** Incorporate creative therapies like art and music for alternative therapeutic avenues.
17. **Promoting Career and Vocational Training for Consumers:** Offer vocational rehabilitation and form partnerships for job opportunities.
18. **Advancing Accessibility in Technology and Infrastructure:** Enhance technology accessibility and improve infrastructure for physical access.

19. Expanding Mental Health First Aid Training: Provide mental health first aid training and awareness programs.
20. Strengthening Respite Care Services: Enhance respite care options and develop diverse models.
21. Encouraging Active Lifestyle and Physical Wellness: Promote physical activity programs and wellness education.
22. Advancing Research in ABI Treatments and Care Strategies: Invest in ABI research and collaborate with experts.
23. Cultivating Community Awareness and Inclusion Initiatives: Conduct awareness campaigns and inclusion initiatives for community integration.
24. Enhancing Emergency Preparedness and Response Capabilities: Provide comprehensive emergency preparedness training and develop response protocols.
25. Promoting Sustainable Practices and Environmental Health: Implement eco-friendly initiatives and educate on environmental health.
26. Building Resilient Support Systems for Consumers and Families: Create strong support networks and provide family education and support programs.
27. Developing Comprehensive Wellness Programs: Implement holistic wellness programs and individualized wellness plans.
28. Fostering Peer Support and Mentorship: Facilitate peer support groups and mentorship programs for shared experiences.
29. Enhancing Accessibility to Emergency and Urgent Care Services: Ensure quick access to emergency services and train staff in emergency response.
30. Promoting Sustainable Practices and Environmental Health: Incorporate sustainable practices and educate on environmental health.
31. Ensuring Continual Legal and Ethical Compliance Training: Regularly provide legal and ethical compliance training.
32. Prioritizing Nutrition and Dietary Health: Provide nutritional support services and education on healthy eating.
33. Establishing a Robust Feedback and Complaint Resolution System: Set up effective feedback mechanisms and a transparent complaint resolution process.
34. Enhancing Physical Therapy and Rehabilitation Services: Provide access to advanced rehabilitation services and innovative techniques.
35. Integrating Art and Creative Therapies: Incorporate creative therapies for therapeutic benefits.
36. Promoting Career and Vocational Training for Consumers: Offer vocational rehabilitation services and partnerships with employers.
37. Advancing Accessibility in Technology and Infrastructure: Enhance technology accessibility and improve infrastructure.
38. Expanding Mental Health First Aid Training: Provide mental health first aid training and awareness programs.
39. Strengthening Respite Care Services: Enhance respite care options and develop diverse models.

40. Encouraging Active Lifestyle and Physical Wellness: Promote physical activity and wellness education.
41. Advancing Research in ABI Treatments and Care Strategies: Invest in ABI research and collaborate with experts.
42. Cultivating Community Awareness and Inclusion Initiatives: Conduct awareness campaigns and promote community inclusion.
43. Enhancing Emergency Preparedness and Response Capabilities: Improve emergency preparedness and response protocols.
44. Promoting Sustainable Practices and Environmental Health: Implement eco-friendly initiatives and educate on environmental health.
45. Building Resilient Support Systems for Consumers and Families: Establish strong support networks and family education programs.
46. Developing Comprehensive Wellness Programs: Implement holistic wellness initiatives and customized wellness plans.
47. Fostering Peer Support and Mentorship: Facilitate peer support groups and mentorship programs.
48. Enhancing Accessibility to Emergency and Urgent Care Services: Ensure quick access to emergency services and train staff.
49. Promoting Sustainable Practices and Environmental Health: Incorporate sustainable practices and educate on environmental health.
50. Ensuring Continual Legal and Ethical Compliance Training: Provide ongoing legal and ethical training.
51. Prioritizing Nutrition and Dietary Health: Offer nutritional support services and healthy eating education.
52. Establishing a Robust Feedback and Complaint Resolution System: Set up feedback mechanisms and a complaint resolution process.
53. Enhancing Physical Therapy and Rehabilitation Services: Provide advanced rehabilitation services and innovative techniques.
54. Integrating Art and Creative Therapies: Incorporate creative therapies like art and music.
55. Promoting Career and Vocational Training for Consumers: Offer vocational rehabilitation and partnerships for job opportunities.
56. Advancing Accessibility in Technology and Infrastructure: Enhance technology accessibility and infrastructure.
57. Expanding Mental Health First Aid Training: Provide mental health first aid training and awareness programs.
58. Strengthening Respite Care Services: Enhance respite care options and develop diverse models.
59. Encouraging Active Lifestyle and Physical Wellness: Promote physical activity programs and wellness education.
60. Advancing Research in ABI Treatments and Care Strategies: Invest in ABI research and collaborate with experts.

61. Cultivating Community Awareness and Inclusion Initiatives: Conduct awareness campaigns and promote community inclusion.
62. Enhancing Emergency Preparedness and Response Capabilities: Improve emergency preparedness and response protocols.
63. Promoting Sustainable Practices and Environmental Health: Implement eco-friendly initiatives and educate on environmental health.

Fw: Medicaid ABI Waiver Program 1, ABI Waiver Program 2, and the Money Follows the Person (MFP) program.

vgiannelli@alliedgroup.org <Office365@messaging.microsoft.com>

Fri 10/13/2023 2:15 PM

To: AABIWR@LIVE.COM <AABIWR@LIVE.COM>;

Cc: Valerie Giannelli <vgiannelli@alliedgroup.org>; Nicole Simmons <nsimmons@alliedgroup.org>; mflagg@alliedgoup.org <mflagg@alliedgoup.org>;

Hi David,
Please see below.
Val

From: Amy Dumont <Office365@messaging.microsoft.com>

Sent: Friday, October 13, 2023 1:54:38 PM

To: Valerie Giannelli <vgiannelli@alliedgroup.org>

Cc: Amy Dumont <Amy.dumont@ct.gov>

Subject: Re: Medicaid ABI Waiver Program 1, ABI Waiver Program 2, and the Money Follows the Person (MFP) program.

We added BCBA in 7/19 as a service provider under the CBT definition for ABI 1 and 2. I do not know about MFP as that is not a waiver. BCBA's are licensed in CT under CT General Statutes 20-185k and 20-185l. I am not sure what else he needs. His agency does not employ CBT's.

Amy

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

Sent: Friday, October 13, 2023 1:25 PM

To: Valerie Giannelli <vgiannelli@alliedgroup.org>

Cc: Nicole Simmons <nsimmons@alliedgroup.org>; Marihonor Flagg <mflagg@alliedgroup.org>; ABI RESOURCES 860 942-0365 <AABIWR@live.com>

Subject: Re: Medicaid ABI Waiver Program 1, ABI Waiver Program 2, and the Money Follows the Person (MFP) program.

Hello Valerie and ACR, checking on the status of this

10/11/2023

Subject: Confirmation: Service Qualification for ABI Waiver Programs and MFP

Dear Val,

Please forgive my confusion as ABI may be receiving conflicting information.

I'd like to expressly confirm, referencing the details from your email about the information Kathy Bruni DSS provided to ACR: the service qualification was added to both ABI waivers 1 and 2, as well as MFP, during the *pending* renewal in November/December 2019.

Is the following correct?

- This change was definitively approved for all three waivers in that year, 2019.
- ACR then added this description in 2019 per DSS directives.

Thank you for your diligence in ensuring clarity and accuracy and clearing up my confusion.

Warm regards,
David Medeiros
ABI Resources

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

Sent: Wednesday, October 11, 2023 11:36 AM

To: Valerie Giannelli <vgiannelli@alliedgroup.org>

Cc: Nicole Simmons <nsimmons@alliedgroup.org>; marihonor Flagg <mflagg@alliedgroup.org>; ABI RESOURCES 860 942-0365 <AABIWR@live.com>

Subject: Re: Medicaid ABI Waiver Program 1, ABI Waiver Program 2, and the Money Follows the Person (MFP) program.

10/11/2023

Subject: Confirmation: Service Qualification for ABI Waiver Programs and MFP

Dear Val,

Please forgive my confusion as ABI may be receiving conflicting information.

10/15/23, 5:30 AM

Fw: Medicaid ABI Waiver Program 1, ABI Waiver ... - ABI RESOURCES 860 942-0365

I'd like to expressly confirm, referencing the details from your email about the information Kathy Bruni DSS provided to ACR: the service qualification was added to both ABI waivers 1 and 2, as well as MFP, during the *pending* renewal in November/December 2019.

Is the following correct?

- This change was definitively approved for all three waivers in that year, 2019.
- ACR then added this description in 2019 per DSS directives.

Thank you for your diligence in ensuring clarity and accuracy and clearing up my confusion.

Warm regards,
David Medeiros
ABI Resources

From: Valerie Giannelli <vgiannelli@alliedgroup.org>

Sent: Wednesday, October 11, 2023 9:17 AM

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

Cc: Nicole Simmons <nsimmons@alliedgroup.org>; Marihonor Flagg <mflagg@alliedgroup.org>

Subject: RE: Medicaid ABI Waiver Program 1, ABI Waiver Program 2, and the Money Follows the Person (MFP) program.

You've received an encrypted message from vgiannelli@alliedgroup.org

To view your message

Save and open the attachment (message.html), and follow the instructions.

Sign in using the following email address: AABIWR@LIVE.COM

This email message and its attachments are for the sole use of the intended recipient or recipients and may contain confidential information. If you have received this email in error, please notify the sender and delete this message.

☐ Message encryption by Microsoft Office 365

Medicaid ABI Waiver Program 1, ABI Waiver Program 2, and the Money Follows the Person (MFP) program.

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

Mon 9/25/2023 9:07 AM

To:marihonor Flagg <mflagg@alliedgroup.org>;Valerie Giannelli Provider Services <vgiannelli@alliedgroup.org>;Allied Community ACR <acr@alliedgroup.org>

09/25/2023

Inquiry on BCBA and LBA/BSL under Medicaid ABI & MFP Waiver Programs

Hello Valerie and Marihonor,

I am reaching out to seek clarification on the qualifications required to provide and bill for behaviorist cognitive services under the Medicaid ABI Waiver Program 1, ABI Waiver Program 2, and the Money Follows the Person (MFP) program.

Specifically, I would like to confirm whether individuals holding the titles of Board Certified Behavior Analyst (BCBA), Licensed Behavior Analyst (LBA), or Behavior Specialist License (BSL) are recognized as qualified providers and permitted to bill for their services under the aforementioned programs.

We would appreciate any information, documentation, or contacts that could provide insight into the eligibility and billing processes related to these professional titles and waiver programs.

I understand that you are likely very busy, but would greatly appreciate a response at your earliest convenience or direction to the appropriate department or individual who may assist with this inquiry.

Thank you very much for your time and assistance.

Sincerely,

David Medeiros,
ABI Resources

choices

① • Nichole - CBT
~~CCSN~~ → SLG

② • Dr. Brissman - CBT
→ SLG

③ • Alternative CBT
- telehealth only

④ no CBT

- Nichole is change jobs.
- She is willing to support you or help you to transition to another CBT
- Nichole is comfortable working w/ Marcela + Christine

The choice is yours
Angelito.

Nichole's last day at CCSN
is Oct 12.

Your family can talk to Carol about
this.

Delivered: Deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada).

postmaster@ct.gov <postmaster@ct.gov>

Thu 9/28/2023 10:47 AM

To:Commis DSS <commis.dss@ct.gov>

 1 attachments (39 KB)

Deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada);

Your message has been delivered to the following recipients:

[Commis DSS \(commis.dss@ct.gov\)](mailto:commis.dss@ct.gov)

Subject: Deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada).

Delivered: Deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada).

postmaster@ct.gov <postmaster@ct.gov>

Thu 9/28/2023 10:48 AM

To:providerfraud.dss@ct.gov <providerfraud.dss@ct.gov>

 1 attachments (39 KB)

Deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada);

Your message has been delivered to the following recipients:

providerfraud.dss@ct.gov (providerfraud.dss@ct.gov)

Subject: Deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada).

Not read: Subject: Urgent: Glastonbury Addressing Serious Concerns and Seeking Immediate Resolution for Medicaid ABI Waiver Program Beneficiary.

DSS, Fraud-Recoveries <providerfraud.dss@ct.gov>

Thu 9/28/2023 8:35 AM

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

Your message

To: DSS, Fraud-Recoveries

Subject: Subject: Urgent: Glastonbury Addressing Serious Concerns and Seeking Immediate Resolution for Medicaid ABI Waiver Program Beneficiary.

Sent: Thursday, September 28, 2023 7:12:05 AM (UTC-05:00) Eastern Time (US & Canada)

was deleted without being read on Thursday, September 28, 2023 8:34:54 AM (UTC-05:00) Eastern Time (US & Canada).

Deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada).

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

Thu 9/28/2023 10:47 AM

To: Commis DSS <commis.dss@ct.gov>; providerfraud.dss@ct.gov <providerfraud.dss@ct.gov>

Would you please explain this?

1)

Your message

To: DSS, Fraud-Recoveries

Subject: DSS would you please explain this?

Sent: Thursday, September 28, 2023 10:36:34 AM (UTC-05:00) Eastern Time (US & Canada)

was deleted without being read on Thursday, September 28, 2023 10:38:16 AM (UTC-05:00) Eastern Time (US & Canada).

2)

DSS Would you please explain this?

Your message

To: DSS, Fraud-Recoveries

Subject: Subject: Urgent: Glastonbury Addressing Serious Concerns and Seeking Immediate Resolution for Medicaid ABI Waiver Program Beneficiary.

Sent: Thursday, September 28, 2023 7:12:05 AM (UTC-05:00) Eastern Time (US & Canada)

was deleted without being read on Thursday, September 28, 2023 8:34:54 AM (UTC-05:00) Eastern Time (US & Canada)

Delivered: Request for Investigation: ABI Waiver Program Consumer Employment Concerns at Supported Living Group (SLG)

postmaster@ct.gov <postmaster@ct.gov>

Wed 9/20/2023 7:59 AM

To: Commis DSS <commis.dss@ct.gov>

 1 attachments (40 KB)

Request for Investigation: ABI Waiver Program Consumer Employment Concerns at Supported Living Group (SLG);

Your message has been delivered to the following recipients:

[Commis DSS \(commis.dss@ct.gov\)](mailto:commis.dss@ct.gov)

Subject: Request for Investigation: ABI Waiver Program Consumer Employment Concerns at Supported Living Group (SLG)

Delivered: Request for Investigation: ABI Waiver Program Consumer Employment Concerns at Supported Living Group (SLG)

postmaster@ct.gov <postmaster@ct.gov>

Wed 9/20/2023 7:59 AM

To: Amy Dumont <amy.dumont@ct.gov>

 1 attachments (42 KB)

Request for Investigation: ABI Waiver Program Consumer Employment Concerns at Supported Living Group (SLG);

Your message has been delivered to the following recipients:

[Amy Dumont \(amy.dumont@ct.gov\)](mailto:amy.dumont@ct.gov)

Subject: Request for Investigation: ABI Waiver Program Consumer Employment Concerns at Supported Living Group (SLG)

Formal Complaint Regarding Unlawful Steering and Referral Processes by Connecticut Community Care Management Services

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

Mon 9/25/2023 12:11 PM

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

Cc: providerfraud.dss@ct.gov <providerfraud.dss@ct.gov>

09/25/2023

Subject: Urgent: Formal Complaint Regarding Unlawful Steering and Referral Processes by Connecticut Community Care Management Services

Dear DSS Commissioner and Amy Dumont COU,

I am writing to formally raise a complaint against Connecticut Community Care Management consultation services with respect to their steering and referral processes being implemented for the federally funded Medicaid ABI Waiver Program.

It has come to our attention that consumers currently receiving CBT behavioral services from CCSN are being improperly advised to change providers and are being coerced into signing release of information agreements to transfer to the Supported Living Group. What's more alarming is that consumers are not being provided with the approved provider list and are being informed by care management that no other options are available to them, which is in direct contravention of their rights under the law.

Details of Complaint:

Issue: Unlawful steering and referral processes

Affected Program: Medicaid ABI Waiver Program

Affected Consumers: Individuals currently receiving CBT behavioral services from CCSN

Conducting Entity: Connecticut Community Care Management consultation services

Requested Action:

Immediate Investigation: A swift and thorough investigation into the aforementioned unlawful practices to safeguard the rights and interests of the affected consumers.

Assurance of Compliance: Assurance that Connecticut Community Care Management services comply strictly with all federal and state laws governing the Medicaid ABI Waiver Program.

Provision of Approved Provider List: Immediate provision of the approved provider list to all affected consumers.

Restoration of Consumer Rights: Ensuring that consumers are well-informed of their rights and available options and are not misled or coerced into making uninformed decisions.

Legal Implications:

The actions conducted by Connecticut Community Care Management consultation services could potentially contravene federal and state laws protecting consumer rights and governing Medicaid programs, leading to severe legal repercussions, including sanctions, penalties, and loss of licensure.

I kindly request your immediate attention to this grave matter, and I urge DSS to take stringent action against any and all entities engaging in unlawful and unethical practices, ensuring the protection and well-being of all consumers under the Medicaid ABI Waiver Program.

Please inform us of any steps that will be taken in response to this complaint and any additional information you may require from us.

Thank you for your immediate attention to this serious issue, and I trust that DSS will uphold the rights of consumers and maintain the integrity of the Medicaid ABI Waiver Program.

Sincerely,

David Medeiros
ABI Resources

This communication is intended solely for the notification and addressing of potential irregularities and misconduct observed in the operation and management of the Medicaid ABI Waiver Program by Connecticut Community Care Management consultation services. The concerns and allegations made herein are predicated on reason to believe and are asserted in good faith, stemming from observed and reported practices which, if substantiated, may amount to violations of applicable law and contractual obligations.

This document and the assertions contained within it are not to be interpreted as conclusive proof or an official indictment of the identified entity's integrity, legality, or professional conduct, but rather as a conveyance of serious concerns that warrant immediate attention and thorough investigation. Until such a comprehensive investigation is conducted and its findings are disclosed, no final determinations or judgments regarding the implicated entity's legal or ethical standing should be made.

This disclaimer serves to clarify that the information provided is for informational purposes only and does not constitute legal advice, professional diagnosis, opinion, treatment or services to you or to any other individual. We expressly disclaim all liability in respect to actions taken or not taken based on any or all the contents of this communication.

We remain, to the fullest extent permissible under law, without prejudice to our rights, remedies, defenses, or claims, whether under the present circumstances or in any future situations arising out of or in connection with the issues raised herein. We reserve the right to make any amendments, revisions, and corrections to the content of this communication as and when new, more accurate, or more comprehensive information becomes available.

By acknowledging receipt of this document, you confirm your understanding and acceptance of the terms stated herein and assume responsibility for forwarding this complaint to the appropriate parties or departments for immediate attention and action.

Subject: Urgent: Glastonbury Addressing Serious Concerns and Seeking Immediate Resolution for Medicaid ABI Waiver Program Beneficiary.

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

Thu 9/28/2023 7:12 AM

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

Cc: Joel.Norwood@ct.gov <Joel.Norwood@ct.gov>; dca.dss@ct.gov <dca.dss@ct.gov>; dcp.dss@ct.gov

<dcp.dss@ct.gov>; olcrah.dss@ct.gov <olcrah.dss@ct.gov>; quality.dss@ct.gov <quality.dss@ct.gov>; providerfraud.dss@ct.gov <providerfraud.dss@ct.gov>

09/28/2023

Subject: Urgent: Addressing Serious Concerns and Seeking Immediate Resolution for Glastonbury Medicaid ABI Waiver Program Beneficiary.

Dear Connecticut Department of Social Services and COU.

I hope this correspondence finds you well. I am writing to support Consumer JG, a resident of Glastonbury and a consumer of the Medicaid Acquired Brain Injury (ABI) Waiver Program.

Consumer JG contacted ABI Resources on September 9, 2023.

The concerns conveyed by the consumer include:

Little to no care management

Absence of service providers

Numerous safety concerns

Housing concerns

Uncertainty over ABI Waiver CBT services

Potential police involvement

Potential judicial involvement.

The consumer explicitly requested that all communications include JG and be conducted via email.

JG has requested that ABI Resources continue attempting to contact care management and has reported significant challenges in obtaining food and water.

ABI Resources, alongside the consumer, has undertaken several initiatives to communicate and acquire clarification from care management. However, care management seems reluctant to provide the necessary information to support the consumer adequately. This information is crucial for Medicaid ABI Waiver Program agency providers to determine if they are adequately equipped to provide the level of services required to address current challenges and concerns.

Some potentialities:

Safety, Legal, and Civil Challenges:

Violation of Rights and Well-being:

The lack of adequate care and communication undermines the consumer's rights to safety, proper living conditions, and now apparent access to essential resources such as food and water.

Breach of Contract and Service Agreement:

Failing to provide the stipulated care and services represents a significant breach of contractual and service agreement obligations, causing distress and potential harm to the consumer.

Violation of Privacy and Autonomy:

The absence of inclusive communication violates the consumer's right to information and decision-making autonomy concerning care.

Risk to Safety and Security:

The identified safety concerns, combined with potential police involvement, significantly endanger the consumer's safety, security, and overall well-being.

Legal Implications and Liabilities:

The above-stated challenges and violations might expose the responsible parties to legal actions, penalties, and liabilities for neglect, maltreatment, and failure to comply with regulatory standards and laws.

Immediate Resolution Requested:

Given the gravity of these reported concerns, we respectfully request your immediate intervention to address and resolve the issues raised by JG. We seek an expedited review of JG's care management, service provisions, and communication processes to ensure that JG's rights, safety, and well-being are upheld and that all legal and contractual obligations are met.

I urge your department to liaise with JG's care management provider and all relevant parties to facilitate a prompt and comprehensive resolution. We are amenable to working collaboratively with all stakeholders involved and providing any necessary support and information to rectify the situation urgently.

We anticipate a swift response and resolution to these pressing concerns and assure you of our utmost cooperation. Thank you for your immediate attention to this critical matter.

Yours sincerely,
David Medeiros
ABI Resources

This document and the information contained herein are provided in good faith, solely for the purpose of addressing and resolving potential serious concerns and deficiencies in services provided to Consumer JG under the Medicaid Acquired Brain Injury (ABI) Waiver Program. The concerns, observations, and representations made in this document are based on information available to, and understood by, ABI Resources as of the date of this correspondence and are not intended to be, and should not be construed as, legal allegations or assertions of liability against any party. The intention behind this communication is to seek immediate and amicable resolutions to safeguard the well-being, rights, and interests of Consumer JG.

Any assertions or references to legal implications or potential liabilities are not intended to serve as formal legal claims or accusations but are mentioned to underline the seriousness of the matter and the urgency with which resolution is sought.

This letter is intended solely for the use of the individual or entity to which it is addressed and may contain information that is privileged and confidential. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited.

We reserve the right to take any further necessary and appropriate actions, legal or otherwise, should the concerns raised herein remain unaddressed.

Thank you for your understanding and cooperation.

Re: Subject: Urgent Complaint and Request for Investigation: Abusive and Manipulative Conduct under Medicaid ABI Waiver Program

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

Wed 9/27/2023 11:24 AM

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

Cc: Joel.Norwood@ct.gov <Joel.Norwood@ct.gov>; dca.dss@ct.gov <dca.dss@ct.gov>; dcp.dss@ct.gov <dcp.dss@ct.gov>; olcrah.dss@ct.gov <olcrah.dss@ct.gov>; quality.dss@ct.gov <quality.dss@ct.gov>

Dear Connecticut Department of Social Services,

I hope this message finds you well. I am experiencing significant challenges navigating CT DSS governmental resources due to a brain injury and stroke. I am reaching out to request your urgent assistance and support in connecting me with the appropriate DSS representatives who can aid me in the delivery of this information. Your guidance and support is needed to navigate the necessary CT DSS systems and to ensure my requests are directed appropriately and fully.

Would you please assist me? I appreciate your immediate attention to this matter and look forward to your prompt response.

Thank you for your understanding and assistance.

Sincerely,
David Medeiros
ABI Resources

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

Sent: Wednesday, September 27, 2023 9:52 AM

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

Subject: Re: Subject: Urgent Complaint and Request for Investigation: Abusive and Manipulative Conduct under Medicaid ABI Waiver Program

NEW: Additional Information. Please review the new attachment.

****Subject: Immediate Investigation Required: Unauthorized Letter and Violation of Medicaid Referrals Leading to Neglectful Abuse of a Vulnerable Consumer****

Dear CT DSS Commissioner and Ms. Amy Dumont, COU Community Options Unit,

I am compelled to bring to your immediate attention more an egregious incident involving CBT Behaviorist Ms. Nichole Collins and a letter presented to the vulnerable consumer under the Medicaid ABI Waiver Program during the surprise ABI Waiver Team meeting . This action, which is in clear violation of Medicaid referrals, has serious implications and constitutes neglectful abuse of an individual living with a brain injury.

****Details of the Incident:****

Ms. Nichole Collins presented a letter to the consumer for later reference, misleading the consumer by presenting she and the Supported Living Group are the consumer's sole resources for acquiring CBT, or no CBT services and dismissing other approved providers. This letter is not in alignment with the

approved provider list and is misleading, offering an apparent ultimatum: to either engage with the Supported Living Group or forgo receiving any CBT services.

Legal and Ethical Implications:

1. **Violation of Medicaid Referrals:**

Presenting referral options to a consumer is a direct violation of Medicaid standards and procedures. This violates care management consultation services.

2. **Neglectful Abuse:**

Providing false information to an individual living with a disability, thereby limiting their access to approved service providers, constitutes neglectful abuse.

3. **Manipulation and Exploitation:**

The false presentation of available resources manipulates the consumer's understanding of available services and exploits their vulnerability due to lack of correct information.

4. **Breach of Trust and Professional Misconduct:**

Such deceptive actions undermine the trust between service providers and consumers and tarnish the integrity of the program.

Immediate Actions Required:

1. **Thorough Investigation:**

An immediate and meticulous investigation into the incident and the contents of the unauthorized letter is crucial.

2. **Strict Action Against Violators:**

Appropriate punitive measures against Ms. Nichole Collins and any involved parties disseminating false information to uphold the integrity of Medicaid programs.

3. **Corrective Measures:**

Rectification of misinformation provided to the affected consumer and reassurance regarding access to all approved providers.

4. **Consumer Support**

Immediate support to alleviate the distress and confusion caused by this incident.

5. **Program Audit:**

A comprehensive audit of current practices to identify and rectify any similar misconduct and to ensure strict adherence to the Federally Funded Medicaid ABI Waiver Program approved provider lists and referral procedures.

Conclusion:

This incident is not only a grave violation of Medicaid referral procedures but is also a stark example of the neglectful abuse of a vulnerable individual living with a disability. I implore you to treat this matter with the utmost seriousness and urgency it deserves and undertake immediate action to

investigate and rectify this serious breach of conduct, ensuring such incidents do not recur, and maintaining the integrity and trust in the Medicaid ABI Waiver Program.

I request to be kept informed about the developments and the corrective measures implemented in this regard.

Thank you for your prompt attention to this critical issue. I am hopeful for a swift and just resolution to protect the rights and well-being of all consumers and providers under the Medicaid programs.

Sincerely,
David Medeiros
ABI Resources

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

Sent: Tuesday, September 26, 2023 7:27:51 PM

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

Subject: Subject: Urgent Complaint and Request for Investigation: Abusive and Manipulative Conduct under Medicaid ABI Waiver Program

Dear Commissioner [Commissioner's Last Name] of the Connecticut Department of Social Services and Ms. Amy Dumont of the COU Community Options Unit,

I am reaching out as a concerned representative of ABI Resources to formally lodge a complaint and request an immediate investigation and rectification of grievous misconduct, potential abuse, and manipulation observed under the Medicaid ABI Waiver Program.

I have been approached by a distressed consumer of the program who receives services from CBT Behaviorist Ms. Nichole Collins. The consumer reported a deeply troubling incident today, resulting from a surprise ABI Waiver program team meeting with a Connecticut Community Care manager consultant. This consumer was subjected to deceptive and potentially abusive behavior during this unexpected confrontation.

Incident Overview:

Ms. Nichole Collins reportedly informed the client that she is currently aligned with the Supported Living Group and explicitly stated her refusal to cooperate with Mr. David from ABI Resources due to a personal dislike. The consumer, in turn, was left distressed, confused, and worried as Ms. Collins made false statements, asserting, "David reported me to the state" and "David said I did a bunch of things I never did," concluding with, "I will not ever work with David." "However, I work with the Supported Living Group, and they provide the same ABI Waiver Program services as ABI Resources."

Alarming, the care management consultant present did not intervene to rectify this misleading guidance, leaving the consumer feeling vulnerable and questioning his relationships with ABI Resources, David, and his care manager consultant. This incident constitutes severe misconduct and necessitates immediate attention to ensure the emotional and psychological well-being of the consumer involved.

Legal and Ethical Implications:

This situation raises substantial concerns regarding:

Consumer Abuse and Exploitation: Misleading a brain-injured disabled adult and manipulating their perceptions is abusive and exploitative.

Violation of Professional Standards: Falsifying information and failure to maintain professional relationships compromise adherence to professional and ethical standards.

Breach of Trust: The incident has severely impaired the trust between the service providers and the consumer, undermining the integrity of the program.

Requested Actions:

Immediate Investigation: A thorough and swift investigation into this incident to ascertain the truth and implement corrective measures.

Review of Similar Incidents: An examination of other cases within the Medicaid ABI Waiver Program to ensure no other consumers are experiencing similar abuse or manipulation.

Comprehensive Audit: An audit of all Medicaid programs receiving federally funded managed consultation services to ensure compliance with legal and ethical standards.

Reassurance to Affected Consumers: Immediate steps to reassure and support the affected consumer and rectify any misinformation or damage caused by the alleged misconduct.

Notification to Higher Authorities:

Given the serious nature of the misconduct and potential abuse in question, I believe it is crucial for the Connecticut Department of Social Services to escalate this complaint to the following:

Department of Health & Human Services (HHS)

Centers for Medicare & Medicaid Services (CMS)

Division of Healthcare Policy (DHP)

Office for Civil Rights (OCR)

Connecticut Department of Public Health (DPH)

Adult Protective Services (APS)

Connecticut Office of the Attorney General

Their involvement is crucial to ensuring thorough evaluation and implementation of necessary corrective measures across all relevant programs and services, guaranteeing that consumer rights and well-being are staunchly protected under federal law.

This will ensure that not only are the abuses within the Medicaid ABI Waiver Program appropriately addressed but also serve to reinforce compliance, transparency, and adherence to the highest standards of care and professional conduct throughout the related federally funded services.

The swift involvement of these entities would signify a commitment to upholding the rights and well-being of consumers, reinforcing trust in the Medicaid programs and services, and ensuring such grievous incidents do not occur in the future.

I trust that the Connecticut Department of Social Services will consider this recommendation seriously and act promptly in involving the appropriate federal entities to address and rectify the aforementioned concerns and to fortify the integrity of the services provided to all consumers under the Medicaid programs.

Conclusion:

Addressing this grave misconduct immediately is imperative to prevent further distress to the concerned consumer and to maintain integrity and trust in Medicaid programs and services. Such manipulative and abusive behaviors must be promptly eradicated, with stringent measures implemented to ensure the protection and well-being of all consumers of federally funded programs.

I implore you to treat this matter with the utmost urgency and severity it warrants and to keep me informed about the progress and outcomes of the investigations and remedial actions taken.

Thank you for your immediate attention to this critical matter. I look forward to your prompt response and resolution.

Sincerely,
David Medeiros

Request for Contact Information of the Current Commissioner of the Department of Social Services

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

Mon 9/25/2023 12:48 PM

To:Deborah.Alexson@ct.gov <Deborah.Alexson@ct.gov>;Commis DSS <commis.dss@ct.gov>

Request for Contact Information of the Current Commissioner of the Department of Social Services.

Dear Ms. Alexson / CT DSS,

I hope this message finds you well. My name is David Medeiros and I am reaching out to inquire about obtaining contact information for the current commissioner of the Department of Social Services. Regrettably, I have been unable to find any pertinent details on the CT.gov website.

I am a brain injury and stroke survivor, and this has rendered the task of locating such information quite challenging for me. Your assistance in this regard would be greatly appreciated, as it will aid me in addressing some crucial matters related to the services provided by the department.

If you could please assist me in finding the relevant contact information or guide me to the appropriate department or individual who could assist with this, I would be most grateful. I understand that everyone has their commitments, and your time and assistance in this matter are very much appreciated.

Thank you very much for considering my request.

Warm Regards,
David Medeiros
ABI Resources