

Transparency and Regulatory Oversight:

There is a need for greater transparency and oversight in how rental agreements are managed within the ABI Waiver Program to ensure they do not conflict with program objectives or consumer rights.

Guidance and Policy Review:

We seek clear guidance on acceptable practices regarding rental agreements and the integration of housing with service provision.

Support for Affected Service Providers:

We request consideration of the adverse impact these practices have on service providers like ABI Resources, who strive to offer competitive and consumer-focused services.

Your prompt attention to this matter is crucial for maintaining the integrity of the ABI Waiver Program and the well-being of its consumers.

Indicators of Potential Kickback Arrangements:

Referral for Incentives:

The relationships and interactions among the service provider, 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 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 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, service utilization, and rental arrangements 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 agencies 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 agency service provider 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.

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





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Date: 11/29/2023

Request for ACLU's Advocacy in Addressing Systemic Disabilities Rights Issues in Connecticut

Dear ACLU Disability Rights Program,

I am writing to you as the founder, CEO, and Director of ABI Resources, a pioneering organization in Connecticut that is devoted to supporting individuals with disabilities. As someone who is personally living with a disability, I have dedicated my life to advocating for the rights and welfare of the disabled community, a mission that deeply aligns with the core values of the ACLU.

Our organization is currently grappling with a situation in Connecticut that gravely affects the rights and well-being of people with disabilities. Systemic issues within the state's disability support framework have led to widespread rights violations, including discrimination and restricted access to essential services. These challenges are not just administrative but indicative of deep-rooted societal and policy failures.

The reason for reaching out to the ACLU is your unmatched expertise and successful track record in civil rights advocacy. We need your support to combat these systemic injustices and ensure the enforcement of disability rights as guaranteed by law.

In the enclosed report, you will find detailed accounts of specific incidents and systemic patterns of neglect and abuse. These include:

Cases of discrimination against individuals with disabilities in accessing public

services and supports.

- Evidence of administrative barriers in the Medicaid ABI Waiver Program that hinder effective service delivery.
- Instances where the rights of disabled individuals have been overlooked or violated, contrary to the principles of justice and equity established under both state and federal laws.

The ACLU's involvement in this matter could catalyze significant change, providing a much-needed voice for those who are often unheard. We believe that with your advocacy and legal expertise, we can hold the relevant authorities accountable and implement reforms that will benefit the disabled community in Connecticut.

We are ready to work alongside the ACLU, providing any further data, testimonials, or documentation needed to support this cause. Your guidance in navigating the complex legal terrain will be invaluable in our efforts to secure justice and equity for individuals with disabilities.

We understand the weight of this request and the resources it demands. However, given the urgency and severity of the situation, we are hopeful for your positive response and eager to collaborate on this vital issue.

Thank you for your time and consideration. Your response to this matter could make a transformative difference in the lives of many.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member





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Date: 11/29/2023

Subject: Request for Support from ADAPT in Addressing Disability Rights
Challenges in Connecticut

Dear ADAPT,

I am writing to you as the founder of ABI Resources and as an individual living with a disability, reaching out to an organization renowned for its impactful direct-action tactics and unwavering commitment to disability rights. Our organization, based in Connecticut, is dedicated to supporting the independence and rights of individuals with disabilities, aligning closely with ADAPT's focus on personal assistance services, community-based living, and anti-discrimination.

In Connecticut, we face significant systemic challenges that are severely impacting the lives and rights of individuals with disabilities. These challenges are complex, encompassing issues related to access to personal assistance services, barriers to community-based living, and widespread discrimination. These issues not only violate the rights of individuals with disabilities but also hinder their full participation in community life.

Given ADAPT's history of effective advocacy and direct action in promoting the rights of people with disabilities, your involvement could be crucial in our fight for systemic change in Connecticut. We are in need of strong voices and action-oriented strategies to challenge the status quo and advocate for the rights and dignity of our community.

Enclosed with this letter is a detailed report outlining the specific issues we are facing, including:

- Lack of adequate and accessible personal assistance services for individuals with disabilities.
- Barriers to community-based living, preventing individuals with disabilities from leading independent and fulfilling lives.
- Instances of discrimination and inequality that impede the full participation of people with disabilities in society.

Your expertise and approach in advocating for disability rights are exactly what is needed to bring these issues to the forefront and drive meaningful change. We believe that collaboration with ADAPT could significantly amplify our efforts and lead to impactful results.

We are prepared to engage in any actions or campaigns that ADAPT deems necessary and are ready to provide any additional information, resources, or support needed. Your experience in organizing direct-action initiatives will be invaluable in our collective efforts to challenge these systemic issues and advocate for the rights and independence of individuals with disabilities in Connecticut.

We understand the commitment and resources such endeavors require. However, given the urgency and impact of these issues, we are hopeful for your engagement and the opportunity to work alongside ADAPT in this critical fight.

Thank you for considering our request. We look forward to the possibility of collaborating with ADAPT to make a transformative impact in the lives of those affected by these challenges in Connecticut.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member





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Date: 11/29/2023

Subject: Request for Legal Advocacy and Systemic Policy Reform Support in Connecticut Disability Rights Issues

Dear Center for Public Representation,

I am writing to you as the founder of ABI Resources, a Connecticut-based organization dedicated to the rights and welfare of individuals with disabilities, and as an individual personally affected by disability. Your organization, CPR, with its focus on systemic policy reform and legal advocacy, is ideally positioned to assist in a matter of critical importance for the disability community in our state.

We are currently faced with systemic issues within Connecticut's disability support system that are infringing upon the rights and well-being of people with disabilities. These issues not only hinder access to essential services but also reflect deeper shortcomings in our policy and legal frameworks.

Given CPR's expertise in advocating for disability rights through systemic policy reform and legal action, I believe your support could be transformative in addressing these challenges. We require an advocacy partner who can navigate and influence the complex legal and policy landscape – a role that CPR has successfully fulfilled in numerous instances.

Enclosed with this letter is a detailed report outlining the specific issues we are encountering. Key areas of concern include:

Inequitable policies and practices hindering access to necessary services for individuals with disabilities.

Lack of adequate legal protections within state programs, notably the Medicaid ABI Waiver Program.

A broader need for systemic policy reform to ensure the rights and dignity of disabled individuals are upheld and respected.

CPR's commitment to effecting change through legal advocacy and policy reform makes you an ideal ally in our pursuit of justice and equality for individuals with disabilities in Connecticut. Your experience and strategic approach to disability rights could significantly impact our efforts to challenge these systemic issues and advocate for necessary reforms.

We are prepared to collaborate closely with CPR, providing any additional information, data, or personal testimonies needed. Your expertise in disability rights law and policy reform will be invaluable in our efforts to ensure justice and systemic change in our state.

We understand the magnitude of this request and the resources it entails.

However, given the urgency and impact of the situation, we are hopeful for your engagement and the opportunity to collaborate with CPR in addressing these critical issues.

Thank you for considering our request. We look forward to the possibility of working with CPR to effectuate meaningful change for the disability community in Connecticut.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member





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Date: 11/29/2023

Subject: Seeking DRA's Advocacy in a High-Impact Disability Rights Case in Connecticut

Dear Disability Rights Advocates,

I write to you as the founder of ABI Resources and as an individual living with a disability, seeking your esteemed organization's advocacy in a pressing matter concerning the rights of people with disabilities in Connecticut. Disability Rights Advocates' renowned expertise in handling complex, high-impact cases makes you an ideal advocate for the significant challenges we currently face.

In Connecticut, systemic rights violations within the disability support system are adversely affecting numerous individuals. These issues are not merely administrative but are deeply rooted in legal and societal frameworks, necessitating a robust and experienced legal approach – a domain where DRA has demonstrated significant impact and success.

Enclosed is a comprehensive report detailing the specific challenges at hand, including:

- Legal barriers that deny equitable access to essential services for individuals with disabilities.
- Insufficient legal protections and oversight within the Medicaid ABI Waiver Program, exacerbating systemic failures.
- A pervasive pattern of neglect and discrimination against individuals

with disabilities, underscoring an urgent need for legal intervention and policy reform.

DRA's commitment to effecting systemic change through impactful litigation aligns perfectly with the needs of our community. Your advocacy could be the catalyst for substantial improvements in the legal and social landscape affecting people with disabilities in Connecticut.

We are ready to provide any necessary information, resources, or support to facilitate your advocacy efforts. Your expertise in disability rights litigation will be invaluable in challenging these systemic injustices and driving meaningful change.

We recognize the commitment such an endeavor requires. However, given the profound impact of these issues, we are hopeful for your involvement and support in addressing this critical situation.

Thank you for considering our request. We look forward to the potential of DRA's advocacy making a transformative difference in the lives of those affected in Connecticut.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member





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Date: 11/29/2023

Subject: Request for Legal Advocacy and Support from DREDF in Addressing Disability Rights Issues in Connecticut

Dear Disability Rights Education & Defense Fund,

I am writing to you as the founder of ABI Resources, and as an individual who personally lives with a disability, to seek your expertise and support in a matter that is both personally and professionally significant to me. Our organization, based in Connecticut, is dedicated to the empowerment and support of individuals with disabilities, aligning closely with DREDF's mission of advancing disability rights through legal advocacy, training, and education.

We are confronted with systemic rights violations within Connecticut's disability support system that severely impact the lives and independence of people with disabilities. These violations encompass a range of issues from access to essential services to the lack of effective legal protection and advocacy for our community.

Given DREDF's prominence as a national civil rights law and policy center, your involvement could be crucial in addressing these systemic challenges. We are in dire need of legal expertise and support to navigate and reform the existing legal and policy framework that is currently failing our community.

Enclosed with this letter is a comprehensive report that outlines the specific challenges we are facing in Connecticut. These include:

Legal barriers and discriminatory practices in accessing public services and supports for individuals with disabilities.

Inefficiencies and legal oversights in the Medicaid ABI Waiver Program that are detrimentally affecting service delivery.

A broader lack of effective legal advocacy and policy intervention to uphold the rights and dignity of disabled individuals.

Your track record in legal advocacy and policy reform makes DREDF an ideal ally in our pursuit of justice and equitable treatment for individuals with disabilities. We believe that through collaborative efforts, we can bring about the necessary legal and policy changes to protect the rights of people with disabilities in our state.

We are ready to work in partnership with DREDF, providing any additional information, data, or personal testimonies needed. Your guidance and support in legal advocacy will be invaluable to our efforts in ensuring justice and systemic reform in Connecticut.

We understand the scope of this request and the resources it involves. However, given the urgency and gravity of the situation, we are hopeful for your engagement and the opportunity to collaborate with an organization as esteemed as DREDF in this critical endeavor.

Thank you for your time and consideration. We look forward to the potential of working together to effectuate meaningful change in the lives of those we serve.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member





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Date: 11/29/2023

Subject: Request for Advocacy Support from NCIL in Championing Disability Rights in Connecticut

Dear National Council on Independent Living,

I am reaching out to you as the founder of ABI Resources and as an individual personally living with a disability. Our organization, based in Connecticut, is committed to advancing the independence and rights of individuals with disabilities, a mission that deeply resonates with me both professionally and personally. Recognizing NCIL's pivotal role in this realm, I am writing to seek your support and collaboration in addressing pressing challenges within our state's disability support system.

We are currently grappling with systemic issues that severely hinder the rights and independence of individuals with disabilities in Connecticut. These challenges range from barriers in accessing essential services to a lack of effective legislative advocacy to protect and empower our community.

NCIL's expertise in disability rights advocacy and policy reform is exactly what is needed to drive significant change in our state. The community we serve is in urgent need of a powerful voice to champion their concerns and facilitate meaningful legislative and policy transformations.

Enclosed with this letter is a detailed report outlining the specific issues we

face, including:

- Restrictive policies that undermine independent living and access to services for individuals with disabilities.
- Gaps in legislative frameworks that fail to adequately support the rights and needs of people with disabilities, especially in relation to the Medicaid ABI Waiver Program.
- Systematic neglect of the rights of disabled individuals, impeding their empowerment and independence.

As someone who experiences these challenges firsthand, I believe that collaboration with NCIL could significantly amplify our efforts to enact policy reforms at both the state and federal levels.

We are eager to partner with NCIL, drawing on your advocacy expertise and resources to navigate the legislative landscape and advocate for policy changes that will benefit the disability community in Connecticut.

We recognize the magnitude of this request but given the severity of the issues at hand, we are hopeful for your engagement and the opportunity to work together towards a more inclusive and empowering future for people with disabilities.

Thank you for considering this request. We look forward to the potential of collaborating with NCIL to make a transformative impact in the lives of those we serve.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member





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Date: 11/29/2023

Subject: Request for Support and Legal Advocacy from NDRN in Addressing Connecticut's Disability Rights Issues

Dear National Disability Rights Network,

I am writing to you as the founder, CEO, and Director of ABI Resources, an organization deeply committed to supporting individuals with disabilities in Connecticut. Given the NDRN's reputation as the largest provider of legally based advocacy services for people with disabilities in the United States, I am reaching out for your support and expertise in a matter of critical importance.

We are currently confronting systemic rights violations within Connecticut's disability support system. These violations are not only infringing upon the rights of individuals with disabilities but are also impeding their access to essential services and support systems. As someone who personally lives with a disability, and as a professional dedicated to this cause, I find these issues particularly troubling and in urgent need of address.

The reason for seeking the NDRN's assistance lies in your extensive experience and proven track record in legal advocacy for disability rights. Your expertise could be instrumental in navigating the complex legal landscape we are facing and in advocating for the necessary reforms to protect and uphold the rights of disabled individuals in our state.

Enclosed with this letter, you will find a detailed report outlining the specific

challenges and systemic issues we have identified. These include:

- Discriminatory practices and barriers in accessing public services and supports for people with disabilities.
- Administrative and bureaucratic hurdles within the Medicaid ABI Waiver Program, leading to ineffective service delivery.
- Instances where the rights and welfare of disabled individuals have been compromised, contrary to both state and federal legal standards.

We believe that the NDRN's involvement could catalyze significant change and bring about the much-needed enforcement of disability rights in Connecticut. Your advocacy, legal expertise, and support in holding the relevant authorities accountable could make a profound difference in the lives of many.

We are prepared to collaborate closely with your team and provide any additional information or documentation needed. Your guidance and support in these legal matters will be invaluable to our efforts in ensuring justice and equitable treatment for individuals with disabilities.

We understand the scope of this request and the resources it entails. However, given the severity and urgency of the situation, we are hopeful for your positive response and eager to partner with an organization as esteemed as the NDRN in this vital cause.

Thank you for your time and consideration. We look forward to the possibility of working together to make a transformative difference in the lives of those we serve.

Best regards,
David Medeiros
David Medeiros
ABI Resources, CEO, Director, Team Member





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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:

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

Founder, CEO, Director, Team Member

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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:

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

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ABI Resources , CEO, Director, Team Member

ABI Resources



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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:

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11/20/2023

Subject Complaint and Request for Clarity Regarding Rental Agreements in the Medicaid ABI Waiver Program 1 and 2.

To: All pertinent departments within the state of Connecticut,

As a stakeholder in the Medicaid Acquired Brain Injury (ABI) Waiver Program, we, David Medeiros and ABI Resources, wish to raise a serious concern and request clarity regarding a critical issue impacting consumers and service providers within the program.

Key Grievance and Request:

We have observed a growing trend where consumers of the ABI Waiver Program are being locked into rental agreements with agency service providers or their business partners. These arrangements appear to significantly restrict consumer choice and freedom, creating a monopolistic environment detrimental to both consumers and independent service providers like ABI Resources.

Concerns:

Restricted Consumer Choice: Consumers are often coerced into staying with a particular agency due to fears of losing their housing, and belongings, or causing

inconvenience to roommates. This undermines the fundamental principle of consumer choice and control in the ABI Waiver Program.

Fear of Repercussions:

Many consumers feel trapped, unable to voice concerns about neglect or abuse due to the fear of losing their housing or facing other retaliatory actions.

Isolation from Advocacy and Assistance:

These rental agreements may isolate consumers from external resources and advocacy groups, further reducing their ability to seek help or change service providers.

Monopolistic Practices:

Such arrangements foster a monopolistic marketplace, hindering the ability of independent providers like ABI Resources to compete fairly and offer services to consumers.

Financial Concerns:

These rental agreements often involve dual payments - for waiver program services and rent - potentially leading to financial improprieties, especially when both payments are sourced from state or federal funding.

Request for Action:

Investigation into Legal and Ethical Violations:

We request a thorough investigation into these practices for potential violations of consumer rights, anti-trust laws, and Medicaid regulations.

Transparency and Regulatory Oversight:

There is a need for greater transparency and oversight in how rental agreements are managed within the ABI Waiver Program to ensure they do not conflict with program objectives or consumer rights.

Guidance and Policy Review:

We seek clear guidance on acceptable practices regarding rental agreements and the integration of housing with service provision.

Support for Affected Service Providers:

We request consideration of the adverse impact these practices have on service providers like ABI Resources, who strive to offer competitive and consumer-focused services.

Your prompt attention to this matter is crucial for maintaining the integrity of the ABI Waiver Program and the well-being of its consumers.

Indicators of Potential Kickback Arrangements:

Referral for Incentives:

The relationships and interactions among the service provider, 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 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.

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Impact on Medicaid Expenditures:

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