



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

Do not use this form to submit classified information.

For instructions or questions, call the Case Review Division at (202) 804-7000.

*Denotes required fields.

IMPORTANT INFORMATION ABOUT FILING A DISCLOSURE

OSC WHISTLEBLOWER DISCLOSURE CHANNEL

Under 5 U.S.C. § 1213 and related provisions, the Office of Special Counsel (OSC) serves as a secure channel for federal employees, former federal employees, and applicants for federal employment with reliable knowledge of the wrongdoing to disclose:

- a violation of law, rule or regulation;
- gross mismanagement;
- gross waste of funds;
- an abuse of authority;
- a substantial and specific danger to public health or safety; and/or
- censorship related to scientific research.

OSC JURISDICTION

OSC has no jurisdiction over disclosures filed by:

- employees of the U.S. Postal Service and the Postal Regulatory Commission;
- members of the armed forces of the United States (*i.e.*, non-civilian military employees);
- state employees operating under federal grants;
- employees of federal contractors;
- other employees or federal agencies that are exempt under federal law; and
- Congressional or judicial branch employees.

ANONYMOUS SOURCES

While OSC will protect the identity of persons who make disclosures, it will not consider anonymous disclosures. If a disclosure is filed by an anonymous source, the disclosure will be referred to the Office of Inspector General in the appropriate agency. OSC will take no further action.

RETALIATION

Do you believe you suffered retaliation by your agency for disclosing wrongdoing? If yes, you may file a complaint of retaliation by navigating back to "My Cases" and selecting "New Complaint." Select Option 1 to complete and submit a Complaint of Prohibited Personnel Practice or other Prohibited Activity (PPPs). *If you have already completed the Complaint of Prohibited Personnel Practice or other Prohibited Activity above, please continue with this Disclosure.* PPPs are employment-related activities that are banned in the federal workforce.



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PPPs generally involve some type of personnel decision or action and may result in personal relief for people who have been subject to a PPP. For example, if we find that you were removed from federal service in retaliation for whistleblowing, OSC may act to get your job back. PPPs can also include allegations of harassment, failure to issue appraisals, and improper hiring. Do not file a disclosure to report retaliation or other PPPs.

CONTACT INFORMATION

Title:

First Name:* David

Middle Initial:

Last Name:* Medeiros

International Address?: No

Address:*

215 Mountain St
Willimantic, CT 06226

Cell Phone Number:

Home Phone Number:

Office Phone Number:

Ext.

Email Address:* aabiwr@live.com

Preferred means of contact:

Email: Yes

Cell phone: No

Home phone: No

Office phone: No

REPRESENTATIVE INFORMATION

Do you have representation? No

Information about representative, if applicable.

First Name:*

Middle Initial:

Last Name:*

International Address?:

Address: *



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Office Phone Number:

Ext.

Cell Phone Number:

Home Phone Number:

Email Address:

EMPLOYMENT INFORMATION

Name of Department/Agency about which you are making a disclosure.

Department:* Health and Human Services

Agency:* Centers For Medicare & Medicaid Services

Agency subcomponent: Office of the Inspector General (OIG)

Street Address: 200 Independence Avenue, SW

City: Washington

State: DC

Zip Code: 20201

Employment Status:* Non-Federal Employee (please specify)

Title	Series	Grade

Please provide your dates of employment in this position.

Employment Service Type	Employment Service Subtype	If Other (specify)
Excepted Service	Other	Private Citizen, Advocate, and Whistleblower
Other	Other	Private Citizen, Advocate, and Whistleblower

Are you covered by a collective bargaining agreement?

DETAILS OF YOUR DISCLOSURES



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Please identify the type of wrongdoing that you are alleging. You can make multiple disclosures, but you **MUST** choose one option. If you check "violation of law, rule, or regulation," specify, if you can, the particular law, rule or regulation violated (by name, subject, and/or legal citation). For each allegation, please answer the following questions (be as specific as possible). Please keep in mind that you will have an opportunity to provide more information and someone from OSC will contact you.

If OSC determines there is a substantial likelihood of wrongdoing, OSC will refer your disclosures to the involved agency for an investigation and report. To meet the substantial likelihood standard, there must be a significant probability that the information reveals wrongdoing that falls within one or more of the categories above. In its evaluation, OSC considers the strength, reliability, and credibility of the disclosures. If the substantial likelihood determination cannot be made, OSC will determine whether there is sufficient information to exercise its discretion to refer the allegations.

DISCLOSURES

Allegation	Gross Waste of Funds
What action did they take?	
When did this occur?	
How did you discover this action?	
What additional facts support your allegation?	
Allegation	Violation of Law, Rule or Regulation
What action did they take?	The Connecticut Office of the State Comptroller, led by General Counsel Yamuna (Yam) Menon, failed to comply with state and federal Freedom of Information Act (FOIA) requirements by: Failing to conduct adequate records searches. Failing to redirect or identify responsible agencies holding requested records. Failing to provide legally required Vaughn Indexes or explanations for withheld information. Additionally, the Connecticut Department of Social Services (DSS), in collaboration with contractors such as Accenture and Manatt, contributed to potential violations by failing to ensure public



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	transparency and compliance with Medicaid oversight regulations under 42 CFR § 430.35.
When did this occur?	Timeframe: The violations began on or around October 29, 2024, when I submitted a Freedom of Information Act (FOIA) request to the Connecticut Office of the State Comptroller and other agencies. These violations are ongoing as the agencies have failed to provide adequate responses, conduct sufficient records searches, or adhere to federal and state transparency laws.
How did you discover this action?	I discovered these actions through my direct engagement with the Freedom of Information Act (FOIA) process and my involvement as an advocate for Medicaid recipients, particularly individuals relying on the Acquired Brain Injury (ABI) Waiver. The following key events revealed the systemic issues: 1. FOIA Requests and Responses On October 29, 2024, I submitted a FOIA request to the Connecticut Office of the State Comptroller, Connecticut Department of Social Services (DSS), and other agencies for records related to Medicaid programs, ABI Waiver amendments, and contractor activities involving Accenture and Manatt. Agencies failed to conduct adequate searches, provide redirections, or adhere to legal timelines, as evidenced by their incomplete responses and appeals communications between October 30 and November 12, 2024. 2. ADA Accommodation Requests I submitted ADA accommodation requests alongside my FOIA filings, as required by my traumatic brain injury (TBI)-related needs. The agencies failed to implement these accommodations, creating procedural barriers and violating federal law. This became evident during their responses to my FOIA requests and appeals in October and November 2024. 3. Medicaid Program Advocacy Through my advocacy work as the founder of ABI Resources, I identified long-standing concerns with Medicaid program transparency and contractor influence. Patterns of mismanagement emerged during reviews of Medicaid amendment processes and stakeholder communications dating back to 2012. The lack of publicly available documentation



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	regarding ABI Waiver amendments and related policies further highlighted systemic failures. 4. Contractor Influence Concerns regarding contractor influence (Accenture and Manatt) were raised by stakeholders and whistleblowers in my network. Their activities, including policy advising without adequate oversight, were identified as contributing to a lack of transparency and potential fiscal waste.
What additional facts support your allegation?	The following facts and documentation substantiate my allegations regarding violations of law, gross mismanagement, abuse of authority, and systemic accountability failures: 1. FOIA Non-Compliance Failure to Conduct Adequate Searches: The Connecticut Office of the State Comptroller failed to certify search methodologies or consult appropriate personnel, violating 5 U.S.C. § 552(a)(3) and Conn. Gen. Stat. § 1-211. No redirections to responsible agencies were made, despite clear indications that records related to Medicaid amendments and contractors (Accenture and Manatt) exist elsewhere. The absence of a Vaughn Index or justification for withheld records violates transparency standards upheld in <i>NARA v. Favish</i> (2004). Documentation: FOIA requests and appeals filed between October 29, 2024, and November 12, 2024, show consistent procedural failures. Agency responses, including a lack of clarity from the Office of the State Comptroller, confirm incomplete searches and non-compliance with FOIA laws. 2. ADA Violations Failure to Provide Accommodations: Requests for email-only communication, embedded text in email bodies, and screen-reader-compatible PDFs were ignored. This violates 42 U.S.C. § 12132 and Section 504 of the Rehabilitation Act, which mandate equal access for individuals with disabilities. The procedural barriers created by these failures disproportionately impacted my ability to process records effectively, constituting discrimination under <i>Tennessee v. Lane</i> (2004). Documentation: ADA accommodation requests submitted alongside FOIA filings show non-compliance



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	with reasonable accommodation standards. Agency correspondence from November 2024 fails to address accommodation needs explicitly, despite repeated reminders. 3. Gross Mismanagement of Medicaid Programs Lack of Oversight in ABI Waiver Amendments: Connecticut Department of Social Services (DSS) engaged contractors (Accenture and Manatt) to advise on Medicaid amendments and managed care models without adequate public transparency or oversight. Failure to comply with federal Medicaid regulations (42 CFR § 430.35) raises concerns about state accountability for program administration. Documentation: No records have been provided to substantiate claims of federal or state review of ABI Waiver amendments or contractor activities. Whistleblower insights suggest contractors influenced policy decisions without addressing stakeholder concerns about accessibility and equity. 4. Abuse of Authority Suppression of Whistleblowers: Whistleblowers reporting systemic Medicaid mismanagement and potential conflicts of interest involving contractors have faced barriers to disclosure, violating the Whistleblower Protection Act (5 U.S.C. § 2302). Agency responses demonstrate a lack of clear mechanisms for reporting or addressing whistleblower concerns. Documentation: Reports from stakeholders highlight systemic suppression of dissent and insufficient safeguards for whistleblower anonymity. Corresp
Allegation	Gross Mismanagement
What action did they take?	The following individuals and contractors, under the leadership of the Connecticut Department of Social Services (DSS), engaged in actions and inactions that violated constitutional law rights, the Americans with Disabilities Act (ADA), Medicaid regulations, taxpayer accountability standards, and whistleblower protections. Their combined failures perpetuated systemic inequities, regulatory non-compliance, and a lack of transparency and accountability in Medicaid program administration, particularly the Acquired Brain Injury (ABI) Waiver. Key Individuals and Their Actions 1. Andrea Barton Reeves



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	Role: Commissioner of the Connecticut Department of Social Services (DSS) (Appointed 2023) Actions and Violations: Failure to Uphold Constitutional Rights: Obstructed transparency guaranteed under the First Amendment, infringing on the public's right to access government information and participate in policymaking. Ignored due process and equal protection obligations under the Fifth and Fourteenth Amendments by failing to implement ADA accommodations and equitable Medicaid policies. Violation of Federal Medicaid Standards: Allowed DSS to proceed with Medicaid amendments, including ABI Waiver updates, without ensuring compliance with 42 U.S.C. § 1396 et seq. and 42 CFR § 430.35, which mandate equity, accessibility, and accountability in Medicaid-funded programs. Failed to address systemic inequities that disproportionately impact individuals with brain injuries and disabilities. Transparency Failures: Ignored state and federal Freedom of Information Act (FOIA) requests, obstructing access to public records related to Medicaid funding, contractor agreements, and policy development. Repeatedly denied ADA accommodation requests, violating 42 U.S.C. § 12132, and creating procedural barriers for individuals with disabilities seeking access to public information. Fiscal Mismanagement: Oversaw contracts with Accenture and Manatt, Phelps & Phillips, LLP, resulting in potential misuse of taxpayer dollars without measurable deliverables or fiscal transparency. 2. Dr. Mehul Dalal Role: Chief Policy Advisor, DSS (Appointed July 2023) Actions and Violations: Policy Decisions Without Public Accountability: Directed Medicaid policies, including ABI Waiver amendments, without adequately consulting Medicaid recipients, providers, or advocacy groups. Ignored federal accessibility requirements under the ADA (42 U.S.C. § 12132) and related Medicaid statutes. Failure to Monitor Contractor Activities: Neglected to establish oversight mechanisms for contractors influencing key Medicaid decisions, allowing Accenture and Manatt to operate
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	without transparency or accountability. Constitutional and Regulatory Breaches: Violated the Fourteenth Amendment's Equal Protection Clause and Medicaid accessibility regulations under 42 CFR § 440.180 by failing to protect Medicaid recipients' rights to equitable services. 3. Joel Norwood Role: Deputy Chief Policy Advisor, DSS (Appointe
When did this occur?	The systemic mismanagement and failures in the administration of the Medicaid program, particularly the Acquired Brain Injury (ABI) Waiver, have occurred over an extended period. Key timeframes illustrate how these issues evolved and were perpetuated under the leadership of Andrea Barton Reeves, Dr. Mehul Dalal, and Joel Norwood, and through contractor influence from Accenture and Manatt, Phelps & Phillips, LLP. These actions and inactions span from 2012 to the present, with specific incidents detailed below: Key Timeframes and Incidents 1. Initial Contractor Engagement and Longstanding Issues (2012–2022) 2012: DSS engaged Accenture and Manatt, Phelps & Phillips, LLP as contractors to advise on Medicaid program development and amendments. During this period, systemic issues in transparency and accountability began to emerge as contractors influenced Medicaid policy without adequate oversight mechanisms. Federal and state accessibility requirements were often overlooked in policy deci
How did you discover this action?	How Did You Discover This Action? The actions and systemic failures in the administration of Medicaid programs, particularly the Acquired Brain Injury (ABI) Waiver, were uncovered through a comprehensive approach combining advocacy efforts, FOIA engagement, stakeholder testimonies, procedural analysis, and legal research. Each method revealed patterns of mismanagement, non-compliance with federal and state laws, and significant gaps in transparency and accountability. 1. Direct Advocacy Efforts As the founder of ABI Resources, I have worked extensively with Medicaid recipients, healthcare providers, and advocacy organizations. My work uncovered: Systemic Barriers to



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	Services: Medicaid recipients reported consistent difficulties accessing equitable care, particularly under the ABI Waiver. These included: Delayed access to providers and services. Inadequate outreach and support for individuals with brain injuries. Confusion about eligibility changes and amendments to Medicaid programs. Stakeholder Concerns: Providers raised alarms about delays in reimbursements and unclear guidance from DSS, pointing to inefficiencies in Medicaid administration. Advocacy groups expressed frustration over the lack of meaningful consultation during key policy changes, indicating that Medicaid recipients and stakeholders were often excluded from the decision-making process. 2. FOIA Requests and Engagement Initial FOIA Requests (October 29, 2024): I filed FOIA requests with DSS, the Connecticut Office of the State Comptroller, and related agencies to obtain records detailing: Medicaid program management. ABI Waiver amendments and updates. Contractor involvement with Accenture and Manatt. Responses revealed: Incomplete or obstructed records searches. Lack of compliance with FOIA transparency standards under 5 U.S.C. § 552 and Conn. Gen. Stat. § 1-211. No justification for withheld documents, violating transparency precedents such as <i>NARA v. Favish</i> (2004). FOIA Appeals (October 30–November 12, 2024): Appeals to FOIA denials further highlighted systemic barriers, including: Procedural delays and inadequate records searches. Refusal to implement ADA accommodations, such as email-only communication and simplified summaries for complex records, violating 42 U.S.C. § 12132 (ADA). 3. Stakeholder Reports and Testimonies Medicaid Recipients: Individuals relying on ABI Waiver services reported barriers such as: Inequitable access to healthcare providers. Delays in receiving services critical to their health and quality of life. Difficulty navigating program changes due to lack of clear communication from DSS. Healthcare Providers and Advocacy Groups: Providers cited inefficiencies in DSS policies that created financial strain and administrative delays. Advocacy
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	groups expressed concerns about DSS's reliance on contractors like Accenture and Manatt, highlighting the lack of public consultation or oversight in Medicaid policy decisions. 4. Procedural and Regulatory Analysis
What additional facts support your allegation?	What Additional Facts Support Your Allegation of a Violation of Law, Rule, or Regulation? The Connecticut Department of Social Services (DSS), under Andrea Barton Reeves' leadership, along with Dr. Mehul Dalal, Joel Norwood, and contractors Accenture and Manatt, Phelps & Phillips, LLP, engaged in actions and inactions that violated multiple federal and state laws, regulations, and constitutional protections. The following detailed facts substantiate the allegations of these violations: 1. Violations of the Freedom of Information Act (FOIA) Failure to Conduct Adequate Records Searches DSS failed to conduct reasonable and thorough searches for FOIA-requested records concerning Medicaid program amendments, ABI Waiver updates, and contractor agreements, violating 5 U.S.C. § 552(a)(3) and Conn. Gen. Stat. § 1-211. No certification of search methodology or systems consulted was provided, leaving the scope and integrity of the search unclear. Failure to Provide Justifications for Withholding Records DSS did not provide legally required Vaughn Indexes or other detailed explanations for records that were withheld or redacted, violating transparency standards established in <i>NARA v. Favish</i> (2004). The refusal to disclose contracts and communications with Accenture and Manatt raises concerns about deliberate obstruction. Evidence of FOIA Non-Compliance FOIA requests submitted on October 29, 2024, and appeals filed between October 30 and November 12, 2024, demonstrate: Incomplete searches and refusals to produce responsive documents. Persistent delays and procedural barriers. 2. Violations of the Americans with Disabilities Act (ADA) Denial of ADA Accommodations DSS failed to provide legally mandated accommodations requested alongside FOIA filings, including: Email-only communication for accessibility. Screen-reader-compatible PDF formats. Simplified



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	summaries for complex documents. These failures violated 42 U.S.C. § 12132 and Section 504 of the Rehabilitation Act, which mandate equal access for individuals with disabilities. Procedural Barriers The lack of accommodations created additional barriers for individuals with disabilities, depriving them of their constitutional right to equal protection under the Fourteenth Amendment. 3. Non-Compliance with Federal Medicaid Regulations Failure to Meet Federal Accessibility and Equity Standards DSS neglected to ensure that amendments to the ABI Waiver complied with 42 CFR § 430.35, which mandates equity, accessibility, and proper federal oversight in Medicaid-funded programs. Medicaid recipients, particularly those with brain injuries, reported delays and inequities in accessing services, demonstrating DSS's failure to implement accessible and equitable care under 42 U.S.C. § 12132. Inadequate Oversight of Contractor Activities Contractors Accenture and Manatt played significant roles in advising on Medicaid amendments and managed care models, but DSS failed to establish: Transparency mechanisms for their recommen
Allegation	Abuse of Authority
What action did they take?	2. What Action Did They Take? The individuals responsible for the Connecticut Department of Social Services (DSS) and related entities engaged in actions and inactions that violated constitutional rights, ADA requirements, state and federal Medicaid laws, taxpayer accountability standards, FOIA transparency obligations, and whistleblower protections. These actions collectively contributed to systemic failures, mismanagement, and inequities in Medicaid program administration, particularly the Acquired Brain Injury (ABI) Waiver. Key Individuals and Their Actions 1. Andrea Barton Reeves Title: Commissioner, Connecticut Department of Social Services (DSS) Actions and Violations: Constitutional Violations: Denied access to public records, violating the First Amendment guarantee of transparency and public participation in government accountability. Failed to



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	uphold due process and equal protection rights under the Fifth and Fourteenth Amendments by neglecting to implement ADA accommodations and equitable Medicaid policies. Non-Compliance with Medicaid Standards: Allowed DSS to implement Medicaid amendments, including ABI Waiver updates, without ensuring compliance with 42 U.S.C. § 1396 et seq. and 42 CFR § 430.35, which mandate equity, accessibility, and federal oversight. Ignored systemic barriers that disproportionately affect Medicaid recipients with disabilities, violating federal accessibility requirements under 42 U.S.C. § 12132. FOIA and Transparency Failures: Repeatedly obstructed public access to Medicaid program records by failing to respond adequately to FOIA requests, violating 5 U.S.C. § 552 and Conn. Gen. Stat. § 1-211. Ignored FOIA appeals and refused to provide Vaughn Indexes or certifications of record searches, demonstrating a deliberate obstruction of transparency laws. Mismanagement of Medicaid Funds: Authorized contracts with Accenture and Manatt, Phelps & Phillips, LLP, without adequate oversight or accountability mechanisms, raising concerns about potential misuse of taxpayer dollars. 2. Dr. Mehul Dalal Title: Chief Policy Advisor, DSS Actions and Violations: Policy Development Without Oversight: Played a leading role in shaping Medicaid policies, including amendments to the ABI Waiver, without ensuring alignment with federal regulations or addressing stakeholder concerns about inequities. ADA and Medicaid Violations: Failed to implement policies that met federal accessibility standards under 42 U.S.C. § 12132 and 42 CFR § 440.180, leaving individuals with disabilities underserved. Transparency Failures: Did not address procedural barriers in FOIA responses, obstructing public accountability and violating transparency laws. 3. Joel Norwood Title: Deputy Chief Policy Advisor, DSS Actions and Violations: Neglect of Oversight Responsibilities: Shared responsibility for inadequate monitoring of ABI Waiver amendments, resulting in gaps in equity and
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	accessibility for Medicaid recipients. Procedural and Accountability Failu
When did this occur?	When Did This Occur? The systemic violations and abuses of authority in the administration of Medicaid programs, particularly the Acquired Brain Injury (ABI) Waiver, span over a decade, beginning in 2012 with contractor engagements and escalating in 2023 under the leadership of Andrea Barton Reeves. These failures continued through November 2024, with key incidents highlighting worsening transparency violations, non-compliance with federal laws, and inequities in Medicaid services. Below is a comprehensive timeline with specific legal references and examples of harm: _____ 1. Initial Contractor Engagements and Policy Decisions (2012–2022) • 2012: • DSS engaged Accenture and Manatt, Phelps & Phillips, LLP to provide consulting services for Medicaid program development, including amendments to the ABI Waiver and managed care models. • Contractor influence occurred without adequate oversight or accountability mechanisms, violating transparency standards
How did you discover this action?	The systemic abuses of authority, transparency failures, and regulatory violations within the Connecticut Department of Social Services (DSS) were uncovered through a multi-pronged approach, including direct advocacy efforts, FOIA requests and appeals, stakeholder testimonies, procedural analysis, and legal research. Each method revealed evidence of persistent mismanagement, non-compliance with state and federal laws, and systemic inequities affecting Medicaid recipients.
What additional facts support your allegation?	The systemic abuses of authority, transparency failures, and regulatory violations within the Connecticut Department of Social Services (DSS) were uncovered through a multi-pronged approach, including direct advocacy efforts, FOIA requests and appeals, stakeholder testimonies, procedural analysis, and legal research. Each method revealed evidence of persistent mismanagement, non-compliance with state and federal laws, and systemic



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	inequities affecting Medicaid recipients. 1. Direct Advocacy Efforts As the founder of ABI Resources, I have worked directly with Medicaid recipients, healthcare providers, and advocacy groups. These experiences revealed systemic barriers, inequities, and procedural failures within DSS: Barriers for ABI Waiver Recipients: Recipients consistently reported: Delays in Service Delivery: Long wait times for approvals and services under the ABI Waiver. Provider Network Issues: Limited provider access and a lack of clarity on eligibility criteria. Communication Failures: Inadequate outreach and guidance on Medicaid program changes. These barriers disproportionately impacted individuals with disabilities, violating federal Medicaid accessibility requirements under 42 CFR § 440.180 and ADA protections under 42 U.S.C. § 12132.
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DISCLOSURE SUBJECTS

Name of individual you believe is responsible for the wrongdoing disclosed.

First Name	Last Name	Title	Chain of Command
Yamuna	Menon	The Connecticut Office of the State Comptroller, led by General Counsel Yamuna (Yam) Menon	The Connecticut Office of the State Comptroller, led by General Counsel Yamuna (Yam) Menon
Andrea	Barton Reeves	Appointed as Commissioner of DSS in early 2023, she oversees the department's	Andrea Barton Reeves: Appointed as Commissioner of DSS in early 2023, she oversees the department's
Dr. Mehul	Dalal	has been serving as the Chief	Dr. Mehul Dalal has been serving as the Chief Policy



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		Policy Advisor for the Connecticut Department of Social Services	Advisor for the Connecticut Department of Social Services
Joel	Norwood	Deputy Chief Policy Advisor	Deputy Chief Policy Advisor
Chiquita	Brooks-LaSure	Administrator of CMS	Administrator of CMS
Andrea Barton Reeves Title: Commissioner, Connecticut Department of Social Services (DSS)	Andrea Barton Reeves Title: Commissioner, Connecticut Department of Social Services (DSS)	Andrea Barton Reeves Title: Commissioner, Connecticut Department of Social Services (DSS)	Andrea Barton Reeves Title: Commissioner, Connecticut Department of Social Services (DSS)
Dr. Mehul Dalal Title: Chief Policy Advisor, DSS	Dr. Mehul Dalal Title: Chief Policy Advisor, DSS	Dr. Mehul Dalal Title: Chief Policy Advisor, DSS	Dr. Mehul Dalal Title: Chief Policy Advisor, DSS
Joel Norwood Title: Deputy Chief Policy Advisor, DSS	Joel Norwood Title: Deputy Chief Policy Advisor, DSS	Joel Norwood Title: Deputy Chief Policy Advisor, DSS	Joel Norwood Title: Deputy Chief Policy Advisor, DSS
Yamuna (Yam) Menon Title: General Counsel/Assistant State Comptroller, Connecticut Office of the State Comptroller	Yamuna (Yam) Menon Title: General Counsel/Assistant State Comptroller, Connecticut Office of the State Comptroller	Yamuna (Yam) Menon Title: General Counsel/Assistant State Comptroller, Connecticut Office of the State Comptroller	Yamuna (Yam) Menon Title: General Counsel/Assistant State Comptroller, Connecticut Office of the State Comptroller
Chiquita Brooks-LaSure Title: Administrator, Centers for Medicare & Medicaid Services (CMS)	Chiquita Brooks-LaSure Title: Administrator, Centers for Medicare & Medicaid Services (CMS)	Chiquita Brooks-LaSure Title: Administrator, Centers for Medicare & Medicaid Services (CMS)	Chiquita Brooks-LaSure Title: Administrator, Centers for Medicare & Medicaid Services (CMS)



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REQUESTED OSC ACTION

What action would you like OSC to take?

Summary of Actions Needed (Ranked by Priority)

1. Federal Investigation (Highest Priority)

Purpose: Address systemic violations of constitutional law, ADA compliance, FOIA transparency, Medicaid regulations, and taxpayer accountability.

Key Objectives:

Investigate DSS for First, Fifth, and Fourteenth Amendment violations.

Enforce compliance with 42 U.S.C. § 12132 (ADA), 5 U.S.C. § 552 (FOIA), 42 CFR § 430.35, and federal taxpayer protection laws.

Hold individuals and entities accountable for mismanagement and legal violations.

2. Audit of Contracts and Expenditures

Purpose: Ensure fiscal accountability and detect potential misuse of taxpayer funds.

Key Objectives:

Audit all contracts with Accenture and Manatt, Phelps & Phillips, LLP.

Identify conflicts of interest, improper influence, and unfulfilled deliverables.

Safeguard federal and state Medicaid funds.

3. Implementation of Corrective Measures

Purpose: Eliminate procedural barriers and ensure equity and accessibility in Medicaid administration.

Key Objectives:

Enforce FOIA compliance, including timely responses and accessible records.

Mandate ADA-compliant communication practices (e.g., screen-reader-compatible documents, simplified summaries).

Align DSS policies with federal equity standards under 42 CFR § 440.180.

4. Strengthening Whistleblower Protections

Purpose: Empower employees and stakeholders to expose misconduct without fear of retaliation.

Key Objectives:

Establish anonymous reporting mechanisms for systemic failures. Monitor and enforce whistleblower protections under the Whistleblower Protection Act (5 U.S.C. § 2302).

Penalize retaliatory actions to maintain transparency and accountability.

5. Mandate Transparency Reforms

Purpose: Restore public trust and ensure transparency in DSS operations and contractor engagements.



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Key Objectives:

Require DSS to publish contracts, expenditures, and Medicaid decisions.

Enforce public access to records through strict FOIA and ADA compliance.

Increase oversight of contractor influence and deliverables.

6. Expanded Oversight of Medicaid Administration

Purpose: Prevent further systemic failures and protect vulnerable populations reliant on Medicaid.

Key Objectives:

Ensure ABI Waiver amendments meet equity and accessibility standards.

Limit undue influence of contractors in policy decisions.

Mandate stakeholder consultation in Medicaid policymaking.

Conclusion

These actions are ranked by their importance to address systemic failures, protect constitutional and ADA rights, ensure equitable Medicaid services, and restore transparency and accountability in DSS operations. Immediate intervention is critical to safeguard public trust, taxpayer funds, and the well-being of Medicaid recipients.

WHERE ELSE DID YOU REPORT THIS MATTER?

I have also disclosed this information to:

Other Action Type	Action Taken Date
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Additional information about reports to Inspectors General, if applicable.

First Name:

Last Name:

Title:

Address:

Email Address:

Telephone Number:

Case ID #:

a. **What is the status of the matter?**

NOTE: MATTERS INVESTIGATED BY AN OFFICE OF INSPECTOR GENERAL



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It is the general policy of OSC not to transmit allegations of wrongdoing to the head of the agency involved if the agency's Office of Inspector General has fully investigated, or is currently investigating, the same allegations.

ATTACHMENTS

Please note that the space available for attachments is limited. Therefore, DO NOT attach every document and email that may be relevant to your claim. You will have an opportunity to make additional submissions at a later date. We recommend limiting attachments to official forms and correspondence that document the action(s) at issue in your disclosure if these documents are relevant to your allegations.

I have attached the following documents to my filing:

File Name
Records Regarding Connecticut Medicaid Programs, ABI Waiver, Amendments, and Federal Agency Oversight and Communications with Accenture and Manatt (2012–Present) (Office of the State Comptroller) (1).zip
requests (4).csv
requests (5).csv
requests (6).csv
11.27.2024 What Actions Did They Take.pdf
09.24.2024 Federal_Intervention_HHS_OIG_CMS_GAO_DOJ_OCR_Whistleblower_Report_2024.pdf
Comprehensive Grievance Report and Request for Clarity Whistleblower Report Medicaid ABI Waiver Programs.pdf

CONSENT

Do you consent to the disclosure of your identity to others outside OSC if it becomes necessary in taking further action on this matter?*

I consent to disclosure of my identity.

Yes



REPORT GOVERNMENT WRONGDOING (DISCLOSURE)

Do not use this form to submit classified information.

For instructions or questions, call the Case Review Division at (202) 804-7000.

*Denotes required fields.

I do not consent to disclosure of my identity. (Even if you do not consent, OSC may disclose your identity if necessary due to an imminent danger to public health or safety or imminent violation of any criminal law. See 5 U.S.C. § 1213(h).)

No

CERTIFICATION

I certify that all of the statements made in this complaint are true, complete, and correct to the best of my knowledge and belief. I understand that a false statement or concealment of a material fact is a criminal offense punishable by a fine, imprisonment, or both. 18 U.S.C. § 1001.*

Yes

BURDEN: The burden for this collection of information (including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the form) is estimated to be an average of one hour to submit a disclosure of information alleging agency wrongdoing, one hour and fifteen minutes to submit a complaint alleging a prohibited personnel practice or other prohibited activity, or 30 minutes to submit a complaint alleging prohibited political activity. Please send any comments about this burden estimate, and suggestions for reducing the burden, to the U.S. Office of Special Counsel, General Counsel's Office, 1730 M Street, NW, Suite 218, Washington, DC 20036-4505.

This Disclosure of Information was Received by OSC on: 11/27/2024

PLEASE KEEP A COPY OF YOUR COMPLAINT, ANY SUPPORTING DOCUMENTATION, AND ANY ADDITIONAL ALLEGATIONS THAT YOU SEND TO OSC NOW OR AT ANY TIME WHILE YOUR COMPLAINT IS PENDING. REPRODUCTION CHARGES UNDER THE FREEDOM OF INFORMATION ACT MAY APPLY TO ANY REQUEST YOU MAKE FOR COPIES OF MATERIALS THAT YOU PROVIDED TO OSC.