

Ohio Value Voters

Since 2007: Protecting Faith, Family, Freedom,
and the Sanctity of Life

1916 Savannah Parkway, Westlake, OH 44145

www.OhioValueVoters.org

07/09/23

By email:, Jeff <jeff.Barlow@molinahealthcare.com>, <joseph.zubretsky@molinahealthcare.com>, <mumtaz.ibrahim@molinahealthcare.com>, <cheryl.shafer@molinahealthcare.com>, <kristi.soave@molinahealthcare.com>, <kimberly.shull@molinahealthcare.com>, Shane <shane.tiernan@molinahealthcare.com>, Dana <Dana.Mocek@molinahealthcare.com>, Scott <Scott.Campbell@molinahealthcare.com>, Atia, Tudy <Theodora.Atia@molinahealthcare.com>, Formyduval, Faith <Faith.Formyduval@molinahealthcare.com>, tbaker@osma.org, "Orr, Robert (Vance)" <Robert_Orr@vance.senate.gov>, "Lescallete, Graham (Vance)" <Graham_Lescallete@vance.senate.gov>, Abigail_Duggan@brown.senate.gov

Re: Molina possible responsibility for opioid mortality by inappropriately blocking access to care

My name is Charles Giunta, I am writing this letter as an executive director of the Ohio Voters organization (we have 23000 members in Ohio), and a Ohio citizen I am deeply concerns about the deepening opioid crisis in Ohio. In the Ohio Franklin County (where the main CPMI program is located) alone more than 13,000 people died from the opioid overdose since 2017 this is a huge social cost (disruption of families, crime) and a huge economic costs to the society. In the Ohio Franklin County alone 15-16 young people die daily from the opioid overdose according to the recent statistics.

Ohio Voters organization is involved in saving children and teen lives and promoting safety from drugs and crime. This an urgent issue for us.

I am aware (using the online and public data) and the data provided by independent legal advisers who researched this issue). The data suggests that Molina allegedly inappropriately denied credentialing for one of the top pain management program that provide life saving services to high risk patients in the epicenter of the opioid epidemic for mostly high risk minority patients over the last six year, while hundreds of the Molina members died in the opioid epidemic because of lack of access to these services.

The documents suggest that Molina this denial is allegedly a bad faith operation that put unjustified financial objectives above members safety and risks vulnerable members lives.

In 2019 Molina discontinued the provider agreement with the Comprehensive Pain Management Institute, LLC abruptly without any warning or reason and reversed this inappropriate decision only after formal complaint and concern for legal intervention. Please find a copy of the formal patient safety concerned submitted to Molina on August 5th, 2019 enclosed.

In February 2022 Molina abruptly without any warning or explanation recouped closed to 34 thousand dollars from the same program, which also corrected after formal complaint and concern for legal intervention

Finally, on June 2nd, 22, Paul N St. Germain RN (the quality of care supervisor for Ohio area) wrote the following email to Comprehensive Pain Management Institute, LLC (see attached):

“Thank You Dr. Margolin,

I really appreciate your help with this and for your very prompt response to our request! Many Thanks for the GREAT care that you take care of our Molina members and all of your patients!!”

Four days later Molina again abruptly without any warning or explanation terminated coverage for this life saving program blocking access to SBIRT care and putting at opioid overdose death risk hundreds of vulnerable, mostly minority members (see the termination letter attached).

This has led to a severe limitation of patient access to certain live saving addiction screening and pain management care throughout Ohio, including traditionally underserved mostly minority communities (like the one served by CPMI), and an increase in opioid-related mortality and death rates (please find the original patient complaints enclosed).

Notably, fifteen (15) U.S. Senators recognized this problem in 2018 and sent a letter to the largest Ohio Medicaid insurer, CareSource to voice their concerns over the insurer’s pain management and substance use disorder policies, which they considered to be exacerbating the nation’s opioid epidemic. (See attached Letter from 15 U.S. Senators to CareSource). The Senators urged the insurer to reexamine its policies and to adopt new policies that promote non-addictive pain management options. We are concerned based on the documents enclosed that Molina demonstrated similar concerns to the issues described in the letter (please find Molina patient complaints enclosed).

Unless we correct this injustice and civil rights violation, the opioid-related death and crime rate will continue to rise, and our society will continue to face negative implications from the opioid epidemic. For example, every branch of the U.S. military has announced record low recruitment this year due, in part, to the opioid epidemic.

(See <https://www.nbcnews.com/news/military/every-branch-us-military-struggling-meet-2022-recruiting-goals-official-rcna35078>).

The NIH data (enclosed) shows that the treatment called SBIRT can save 39% percent of the individuals with opioid addiction:

https://www.google.com/search?q=SBIRT+statistics&rlz=1C1CHBF_enUS739US739&oq=SBIRT+statistics&aqs=chrome..69i57j0i390l2.12202j0j7&sourceid=chrome&ie=UTF-8

“SBIRT is increasingly used in medical settings in the United States and internationally. In a large study of SBIRT outcomes, at six-month follow-up, **illicit drug use was 68% lower and heavy alcohol consumption was 39% lower among individuals who had screened positive for hazardous drug and alcohol use.**”

Comprehensive Pain Management Institute, LLC was rated as one of the top programs in the state by the independent experts (see enclosed) that implements this strategy for high risk patients. From the public information available online (at <https://cpmiohio.com/>) they have an approval of the national academy (see enclosed) that reviewed the protocol and the outcomes, peer reviewed journal publication with the director of drug and alcohol services from the Cleveland foundation and multiple experts (see the peer reviewed publication enclosed) and agencies (rated as top doctors, top ten, top 5 percent, top 3 in Columbus and many other accolades available online).

I am not a lawyer or a doctor, however the public documents enclosed seem to indicate that Molina allegedly violated multiple ethical and procedural rules required by the federal, state law and the Medicare / Medicaid integrity manual.

This could have caused hundreds of deaths that could have been prevented, increase in crime, family violence, drug related human trafficking in the area and a huge medical expense related to cost of the hospital stay, ICU, ER, detox program, medical cost of the crime and drug related motor vehicle accidents based on the state and federal statistics. There is additional cost to treat other medical problems related to opioid use (for example peak new Hepatitis C cases with more than 15K people dying annually).

It is our understanding that Molina has blocked access to SBIRT care and put at opioid overdose death risk hundreds of vulnerable, mostly minority members.

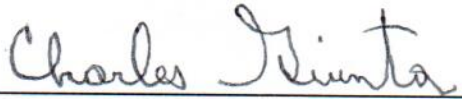
In summary, the unjustified financial objectives presented as a saving limited Medicare and Medicaid resources have resulted in a huge loss of life and overuse of the limited Medicare and Medicaid resources, Molina was trying to save...

I am not acting on behalf of any organization or agency; this is good faith complaint of a public organization. We neither are doctors nor lawyers nor take any side in this dispute, however we are aware of multiple specific patients who were denied access to this life saving services and put at risk.

We recommend that Comprehensive Pain Management Institute, LLC submits a new formal credentialing application to Molina.

If this application is unjustly denied again, we may need to take appropriate regulatory and legal steps (such as advocating audit and revocation of the Molina Medicaid license) and alarming the elected officials to these violations and misuse of the federal funds (such as HEDIS measurements funding and others).

Respectfully,

A handwritten signature in cursive script that reads "Charles Giunta". The signature is written in dark ink and is positioned above a horizontal line.

Charles Giunta