

# Ohio Value Voters

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

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## **Re: Aetna's possible responsibility for opioid mortality by inappropriately blocking access to care**

My name is Charles Giunta, I am writing this letter as the executive director of the Ohio Value 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 Aetna allegedly inappropriately denied billable services for one of the top pain management program (Comprehensive Pain Management Institute, LLC) that provides life saving services to high risk patients in the epicenter of the opioid epidemic for mostly high risk minority patients over the last two years, while hundreds of the Aetna members died in the opioid epidemic because of lack of access to these services.

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



The services seemed to be denied across the board (see the document attached, patient names are blotted for HIPAA compliance) without any proper review or justification in violation of the Medicare Medicaid manual and proper state and federal regulations. On other occasion Aetna seem to stall payments in a passive aggressive way by unnecessary record reviews that take 90-120 days or longer. The attached unpaid CPT codes analysis shows that all types of live saving services including urine drug screens, office visits, pain procedures and tests were denied or stalled in a pattern that suggests a bad faith operation and unjustified financial objectives that Aetna set.

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 Aetna demonstrated similar concerns to the issues described in the letter (please find Aetna 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](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 Aetna 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 Aetna has blocked access to SBIRT care and put at opioid overdose death risk hundreds of vulnerable, mostly minority members.

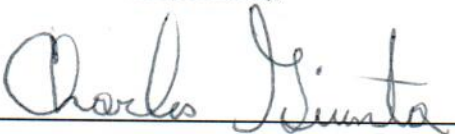
In summary, the unjustified financial objectives presented as a saving limited Medicare and Medicaid resources have resulted in a huge loss of life and overuse of the limited Medicare and Medicaid resources, Aetna was trying to save...

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 Aetna reviews and acts upon the enclosed Comprehensive Pain Management Institute, LLC grievance and pays the outstanding services.**

**If these services are unjustly denied again, we may need to take appropriate regulatory and legal steps (such as advocating audit and revocation of the Aetna 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 dark ink, appearing to read "Charles Giunta", written over a horizontal line.

**Charles Giunta**

**Executive Director, Ohio Value Voters**