

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Anmarie Calgaro,

Plaintiff,

v.

St. Louis County et al.,

Defendants.

Case No. 16-cv-3919 (PAM/LIB)

DECLARATION OF DEBORAH WALDRIFF

I, Deborah Waldriff, state:

1. I am the Director of the Financial Assistance Division of the St. Louis County Department of Public Health and Human Services. The Financial Assistance Division is responsible for administering certain aspects of medical assistance, Minnesota's Medicaid program, in St. Louis County. I have worked in the Financial Assistance Division for almost sixteen years. I have personal knowledge of and am competent to testify on the matters stated herein.

2. As the Director of the Financial Assistance Division, I have access to the Minnesota Eligibility Technology System, commonly known as METS. METS contains data concerning medical assistance, among other things.

3. METS shows that J.D.K. applied for medical assistance online via the MNsure website, www.mnsure.org, on November 5, 2015, and that the application was approved the same day.

4. METS shows that J.D.K.'s enrollment in medical assistance ended on November 1, 2016, and that J.D.K. has not been enrolled in medical assistance at any time since that date.

5. St. Louis County did not approve and had no involvement in approving J.D.K.'s application for medical assistance. Online applications like the one submitted by J.D.K. are handled by the State through METS, not St. Louis County.

6. St. Louis County did not approve and had no involvement in approving any medical-assistance payments in connection with J.D.K.'s enrollment in medical assistance. Such approvals were handled by the State, not St. Louis County.

7. St. Louis County did not make and had no involvement in making any medical-assistance payments to Fairview Health Services, Park Nicollet Health Services, or anyone else in connection with J.D.K.'s enrollment in medical assistance. Such payments, which included a combination of federal and State funds, were handled by the State, not St. Louis County.

8. As I described above, St. Louis County played no role in determining that J.D.K. was eligible for medical assistance or in approving or making any medical-assistance payments relating to J.D.K.

9. METS does not show what medical services J.D.K. received during J.D.K.'s enrollment in medical assistance. Neither does any other source of data available to St. Louis County employees in the Department of Public Health and Human Services.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 14, 2016.

s/ Deborah Waldriff

Deborah Waldriff