

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

CODY FLACK, *et al.*,
*individually and on behalf of all others
similarly situated,*

Plaintiffs,

v.

WISCONSIN DEPARTMENT OF
HEALTH SERVICES, *et al.*,

Defendants.

Case No. 3:18-cv-00309-wmc
Judge William Conley

DECLARATION OF KRISTIE S. MEIER

I, Kristie S. Meier, hereby state as follows:

1. I am over the age of eighteen and have personal knowledge of the matters stated in this declaration.
2. I am the Director and Deputy General Counsel for Compliance Services at Quartz Health Solutions, Inc. (“Quartz”) and Quartz Health Plan Corporation (“QHPC”). QHPC is a not-for-profit health maintenance organization, and Quartz is a management service organization, based in Sauk City, Wisconsin, and co-owned by UW Health, Gundersen Health System, and UnityPoint Health.
3. Quartz manages various health insurance plans, including individual and family plans, group plans, employer-provided plans, Medicare plans, and Medicaid plans. Pursuant to a contract with the Wisconsin Department of Health Services, QHPC is a Wisconsin Medicaid (BadgerCare Plus) health management organization (HMO).
4. When deciding coverage for Wisconsin Medicaid beneficiaries for a particular service, Quartz follows Wisconsin Medicaid’s published medical policies, if any. In the absence

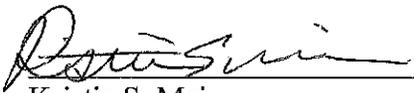
of a specific Wisconsin Medicaid medical policy for a particular treatment or service, Quartz will apply its own medical policies in making coverage determinations for Medicaid beneficiaries, consistent with Medicaid rules.

5. Currently, DHS does not have a published medical policy on surgical treatments for gender dysphoria. Accordingly, Quartz applies its own medical policy on such treatments, which it also applies to its other plans, when reviewing prior authorization requests for such procedures.

6. If DHS were to publish a medical policy on surgical treatments for gender dysphoria, Quartz would follow that policy in making coverage determinations for those treatments.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 10th day of September, 2019.

BY:  _____
Kristie S. Meier