

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

AUGUST DEKKER, *et al.*,

Plaintiffs,

v.

JASON WEIDA, *et al.*,

Defendants.

Case No. 4:22-cv-00325-RH-MAF

**PLAINTIFFS' MOTION TO COMPEL PRODUCTION
OF DOCUMENTS AND FOR EXPEDITED BRIEFING AND RULING**

Pursuant to Fed. R. Civ. P. 37(a)(3)(b) and N.D. Local Rs. 7.1(L) and 26.1, Plaintiffs move this Court for an order compelling Defendants to produce documents in response to Plaintiffs' Requests for Production, and for an expedited briefing schedule and ruling on this Motion. As grounds, Plaintiffs state:

1. This lawsuit challenges Defendants' adoption of Fla. Admin. Code R. 59G-1.050(7) (the "Challenged Exclusion"), which prohibits Medicaid coverage for medically necessary treatments for gender dysphoria.

2. Plaintiffs are transgender Medicaid recipients diagnosed with gender dysphoria who for years received Medicaid coverage of medically necessary treatment for their respective gender dysphoria diagnoses. The Challenged

Exclusion took away that coverage, resulting in the denial of access to necessary medical care, and causing significant physical and emotional harm to Plaintiffs and other transgender Medicaid recipients across Florida.

3. As the Court is aware, there is a very tight discovery schedule in this case given the impact the Challenged Rule has on the Plaintiffs' well-being. Plaintiffs have proceeded diligently with discovery, serving Requests for Production on Defendants on November 17, 2022. Defendants' responses were due on December 22. Defendants moved for additional time to respond to these requests but the Court denied that request. (ECF 75.) Defendants served their written responses on December 22.

4. Defendants first produced documents on January 6, 2023, nearly three weeks after the response deadline. Their initial production was wholly deficient, and additional documents produced on January 13 did not cure the existing deficiencies.

5. As outlined below, Defendants' now-complete production unilaterally narrows many of the requests and/or the time periods and lodges many baseless boilerplate and general objections. Moreover, Defendants failed to provide a privilege log until January 13, 2023, preventing Plaintiffs from filing the instant motion sooner. This privilege log contains 583 withheld documents and is rife with

deficiencies. (Ex. 3.)

6. Plaintiffs' counsel have attempted to confer with Defendants' counsel on these issues but to no avail. Specifically, counsel met on December 30, 2022, January 5, 2023, and January 10, 2023 to confer about Defendants' deficient discovery responses. Plaintiffs' counsel also sent correspondence specifying the above-noted insufficiencies on December 22, 2022 and January 4, 5 and 9, 2023. (*See* Ex. 1.) The parties exchanged additional emails and letters on January 10, 11 and 12, 2023. (*See* Ex. 2.)

7. Pursuant to this Court's Amended Scheduling Order (ECF 71), fact-discovery ends on February 7, 2023. The deadline for dispositive motions is April 7, 2023. It is improper for Defendants to continue to delay the production of documents that are both relevant and proportional to the needs of the case. Notably, Defendants fail to articulate how the specific requests are not relevant or proportional to the needs of the case. Nor do they establish any undue burden in producing the information requested.

8. This motion addresses the following deficiencies: (1) Defendants' unilateral limitation on the timeframe for Plaintiffs' requests to a single year, from January 1, 2022 to present; (2) Defendants' refusal to search agency communications using Plaintiff's search terms, which were set forth clearly in a single request; (3)

Defendants' insufficient response to a request for documents evidencing AHCA's criteria for coverage for gender dysphoria treatments prior to the Challenged Exclusion; (4) Defendants' refusal to produce documents evidencing their assessment of these treatments prior to adopting the Challenged Exclusion; and (5) Defendants' incorrect interpretation of the work product privilege to withhold numerous discoverable and non-privileged documents.

9. Plaintiffs are prejudiced by each of these deficiencies in Defendants' production. Plaintiffs have been forced to prepare for depositions without access to necessary, discoverable information. This is particularly problematic for the Rule 30(b)(6) deposition of AHCA's agency representative, presently scheduled for February 2, 2023.

10. Because time is of the essence, Plaintiffs seek an expedited briefing schedule and ruling from the Court, and note that further delay in the production may necessitate a motion to extend the deadline for fact discovery currently set for February 7, 2023 so that it is coextensive with expert discovery.

WHEREFORE, Plaintiffs Request that the Court grant their motion to compel the production of documents, impose an expedited briefing schedule, and issue a ruling in an expedited manner.

MEMORANDUM OF LAW

I. LEGAL STANDARD

Rule 26 entitles Plaintiffs to reasonable discovery of materials and evidence relevant to the issues raised in their Complaint. *See* Fed. R. Civ. P. 26(b)(1) (2015); *see GHMC Holding Co., Inc. v. Sickle*, No. 3:14cv614, 2016 WL 7757522, at *2 (N.D. Fla., Feb. 23, 2016). As a general matter, the purpose of discovery under the Federal Rules of Civil Procedure “is to require the disclosure of all relevant information so that the ultimate resolution of disputed issues in any civil action may be based on a full and accurate understanding of the true facts, and therefore[,] embody a fair and just result.” *Pitts v. Francis*, No. 5:07cv169, 2008 WL 2229524, at *1 (N.D. Fla. May 28, 2008). Its purpose is also to allow each party to obtain information to best prepare for their respective cases. *DeepGulf, Inc. v. Moszkowski*, 330 F.R.D. 600, 605 (N.D. Fla. 2019). The information “need not be admissible in evidence” to be discoverable. *See* Fed. R. Civ. P. 26(b)(1); *Oppenheimer Fund, Inc. v. Sanders*, 437 U.S. 340, 351-52 (1978). Taken together, Rules 26(g)(1)(A) and 34(1)(1), “place a burden on a party and the party’s counsel to ensure that a reasonable and complete search is conducted and that *all* responsive material is either produced or withheld under a proper objection.” *Waddell v. HW3 Inv. Grp., LLC*, No. 5:21cv55, 2021 WL 9781801, at *2 (N.D. Fla. Dec. 23, 2021) (internal

citation and quotations marks omitted) (emphasis added).

Motions to compel discovery brought pursuant to Rule 37 are committed to the sound discretion of the trial court. *Commercial Union Ins. Co. v. Westrope*, 730 F.2d 729, 731 (11th Cir. 1984). Boilerplate, shotgun-style general objections are not allowed. *Covington v. Sailormen Inc.*, 274 F.R.D. 692, 693 (N.D. Fla. 2011); see N.D. Local Rule 26.1(c). “[T]he party who seeks to exclude discovery as irrelevant bears the burden of demonstrating that it is indeed irrelevant.” *Bartram, LLC v. Landmark Am. Ins. Co.*, No. 1:10cv00028, 2011 WL 528206, at *3 (N.D. Fla. Feb. 4, 2011). Moreover, “where a party objects that the burden of the request for production is disproportionate to the needs of the case, the objecting party bears the burden of demonstrating that the request is unreasonable or unduly burdensome.” *Vision Constr. Ent., Inc. v. Argos Ready Mix, LLC*, No. 3:15cv534, 2017 WL 10084359, at *2 (N.D. Fla. June 28, 2017) (cleaned up); see Fed. R. Civ. P. 33(b)(4) and 34(b)(2)(B); *Panola Land Buyers Ass’n v. Shuman*, 762 F.2d 1550, 1559 (11th Cir. 1985) (citing *Josephs v. Harris Corp.*, 677 F.2d 985, 992 (3d Cir. 1982)) (“the party resisting discovery ‘must show specifically how...each interrogatory is not relevant or how each question is overly broad, burdensome or oppressive.’”).

II. REQUESTS AT ISSUE

Pursuant to Local Rule 26.1(d), Plaintiffs set forth the requests and responses

at issue verbatim. Where the response is identical for multiple requests, Plaintiffs quote it once. The quoted responses are from Defendants' Amended Responses to Plaintiffs' Requests for Production served on January 6, 2023.

As shown below, Defendants present the same boilerplate objections to nearly all of Plaintiffs' requests despite such objections being wholly improper. *See F.D.I.C. v. Brudnicki*, 291 F.R.D. 669, 674 n.4 (N.D. Fla. 2013) ("to raise boilerplate objections and then produce documents subject to the objection" is prohibited by the local rules). The burden is on Defendants to demonstrate with specificity how the objected-to requests are unreasonable, but despite multiple conferences between the parties, they have not done so, instead merely standing on their objections. *See, e.g., Milinazzo v. State Farm Ins. Co.*, 247 F.R.D. 691, 695 (S.D. Fla. 2007); *Dunkin' Donuts Inc. v. Mary's Donuts, Inc.*, No. 01cv392, 2001 WL 34079319, at *3 (S.D. Fla. Nov. 1, 2001); *Rosbach v. Rundle*, 128 F.Supp. 2d 1348, 1354 (S.D. Fla. 2000).

Plaintiffs' Request Nos. 3-5, 8, 10, 11, 13-15, 17, 25-26, 41-43, 52, 54-55

3: All Communications between Defendants and the Florida Department of Health, including Surgeon General Joseph Ladapo, related to the guidance titled "Treatment of Gender Dysphoria for Children and Adolescents" released on April 20, 2022[.]

4: All Communications between Defendants and the office of Governor Ron DeSantis related to the guidance referenced in Request No. 3 above, a copy of which is attached hereto as Exhibit 1.

5: All Communications related to the letter from Secretary Simone Marstiller to AHCA Deputy Secretary for Medicaid Tom Wallace

requesting that the AHCA determine whether the treatments addressed in the Florida Department of Health's Guidance were "consistent with the generally accepted professional medical standards and or experimental or investigational." A copy of the letter attached hereto as Exhibit 2.

8: All Documents relating to any steps that Defendants undertook to ensure that Medicaid recipients diagnosed with Gender Dysphoria continued to receive treatment for Gender Dysphoria at the time the Challenged Exclusion became effective.

10: All draft and final correspondence from Defendants to Medicaid recipients relating to the Challenged Exclusion.

11: All draft and final notices to Medicaid recipients, including but not limited to Notices of Adverse Benefit Determination, Notices of Plan Appeal Resolution, and Notices of Outcome, relating to the services identified in the Challenged Exclusion.

13: All Communications between Defendants and any Person who participated in promulgating the GAPMS Memo by advising Defendants, conducting research, or drafting, editing, or reviewing the GAPMS Memo.

14: All Communications between Defendants and each GAPMS Memo attachment author, including Romina Brignardello-Petersen; Wojtek Wiercioch; James Cantor; Quentin Van Meter; Patrick Lappert; and G. Kevin Donovan.

15: All Documents related to testimony given to, considered by, or relied upon by Defendants in connection with the promulgation of the Challenged Exclusion.

17: All Documents relating to Defendants' contacting or consulting any Person for guidance, recommendations, or assessments relevant to the development of the Challenged Exclusion.

25: All Documents reflecting policies, procedures, or practices related to the implementation, application, or enforcement of the Challenged Exclusion.

26: All Communications relating to the implementation, enforcement, and/or impact of the Challenged Exclusion.

41: All Documents related to the planning, coordination, and content of the July 8 Hearing.

42: All Documents related to attendance, participation in and/or public comments regarding the Proposed Rule with, or regarding, the Christian Family Coalition, the Florida Citizens Alliance, Warriors of Faith, Protect our Children Project, and individuals Chloe Cole, Sophia Galvin, and Anthony Verdugo.

43: All Documents related to the creation, purpose, and/or distribution of materials reflecting the “Let Kids Be Kids” slogan and graphics. (Examples attached hereto as Exhibit 3.)

52: All Communications between Defendants and any of the individuals identified in Defendants’ Initial Disclosures as individuals likely to have discoverable information supporting Defendants’ Claims or Defenses.

54: All Documents which Defendants considered, relied upon, or intend to rely upon, in support of their admissions and/or denials of any of the allegations contained in the Complaint.

55: All Documents which Defendants considered, relied upon, or intend to rely upon, in answering each Interrogatory and each Request for Admission in this Action.

Defendants’ Response to Request Nos. 3-5, 8, 10, 11, 13-15, 17, 25-26, 41-43, 52, 54-55:

Defendants object to this request. The requested documents may be subject to the attorney-client privilege, the work product doctrine, and prohibitions on disclosing healthcare information. The time period of the request, between January 1, 2015 to present, is overly broad, in that

Rule 59G-1.050(7) was promulgated¹ in 2022.

Defendants will produce all non-privileged responsive documents on January 6, 2023. The time period of these documents is between January 1, 2022 to present.

Plaintiffs' Request Nos. 6-7, 16:

6: All reports and data collected or gathered, regardless of whether prepared by or on behalf of Defendants, and regardless of whether presented, reviewed, considered, or relied upon by Defendants, in connection with the development and promulgation of the GAPMS Memo.

7: All reports and data collected or gathered, regardless of whether prepared by or on behalf of Defendants, and regardless of whether presented, reviewed, considered, or relied upon by Defendants, in connection with the development and promulgation of the Challenged Exclusion.

16: All Documents and information relied upon by Defendants in considering whether the services identified in the Challenged Exclusion were consistent with generally accepted professional medical standards, including, the information identified in Fla. Admin. Code R. 59G-1.035(4).

Defendants' Response to Request Nos. 6-7, 16:

Defendants object to this request as overbroad and unduly burdensome. “All reports” and “all” “data,” “presented, reviewed,” and “considered” by Defendants related to gender dysphoria (the subject of the GAPMS Memo) presents too expansive of a list of documents. That said, Defendants made a concerted effort to review scientific studies concerning the issue. The GAPMS Memo itself endeavors to collect a list of the material reviewed as part of the process. That information is

¹ For Request Nos. 3-5, the response references the DOH guidance titled “Treatment of Gender Dysphoria for Children and Adolescents” instead of Rule 59G-1050(7); for Request. No. 43, the response references the “Let Kids be Kids” slogan materials instead of Rule 59G-1050(7).

publicly available: https://ahca.myflorida.com/letkidsbekids/docs/AHCA_GAPMS_June_2022_Report.pdf.

Plaintiffs' Request No. 19

19: All Communications between Defendants and Florida Medicaid managed care plans and other utilization review entities relating to Medicaid coverage of Gender Dysphoria.

Defendants' Response to Request No. 19:

Defendants object to this request. The requested documents may be subject to the attorney-client privilege, the work product doctrine, and otherwise contain confidential information. The time period of the request, between January 1, 2015 to present, is overly broad, in that Rule 59G-1.050(7) was promulgated in 2022.

Defendants will produce all non-privileged responsive documents on January 6, 2023. Consistent with the meet-and-confer discussions on January 5, 2023 and December 30, 2022, Defendants will further investigate this request and will produce any other responsive documents, if any, by January 13, 2023. The time period of these documents is between January 1, 2022 to present.

Plaintiffs' Requests Nos. 21 and 24:

21: All instructions, scripts, trainings, policies, procedures, or other guidance concerning the application of the medical necessity standard to the coverage of Gender Dysphoria treatment for Medicaid recipients.

24: All Documents reflecting Defendants' criteria existing prior to August 21, 2022, for Medicaid authorization and coverage for treatments and services for Gender Dysphoria, including but not limited to: puberty blockers, hormones and hormone antagonists, sex reassignment surgeries, and any other procedures that alter primary or secondary sexual characteristics.

Defendants' Response to Request Nos. 21 and 24:

The information that this request seeks is publicly available: https://ahca.myflorida.com/Medicaid/review/General/59G_1010_Defi

nitions.pdf.

Plaintiffs' Request No. 33

All Communications containing the term “transgender,” “Gender Dysphoria,” “gender reassignment,” “sexual reassignment,” gender-affirming,” “gender affirming,” “gender transition,” “medical transition,” “social transition,” transsexual,” or “sex change” in the subject, the body, or any attachments, to or from (including ccs and bccs) current or then-current AHCA employees.

Defendants' Response to Request No. 33:

Defendants object to this request. The requested documents may be subject to the attorney-client privilege and the work product doctrine. The time period of the request, between January 1, 2015 to present, is overly broad, in that Rule 59G-1.050(7) was promulgated in 2022. Defendants further object to this request as overly broad and unduly burdensome because it would require electronic searches of all emails for the occurrence of specific words or phrases which are commonly used. Defendant AHCA is a large state agency that maintains a massive number of emails. Defendants' system cannot process collections which generate an excessive number of results. For instance, the terms “gender-affirming” and “gender affirming” alone generated collections of 17.613 GB and 18.895 GB, respectively, for the year 2022.

Defendants will produce all non-privileged responsive documents on January 6, 2023. The time period of these documents is between January 1, 2022 to September 7, 2022, the date Plaintiffs' complaint was filed. Defendants will use the search term “gender dysphoria” over this time period.

Plaintiffs' Requests Nos. 35- 39

35: All Documents regarding any report, research, or analysis by or on behalf of Defendants and/or the State of Florida on whether the Challenged Exclusion complies with the Medicaid Act's Comparability requirements (42 U.S.C. § 1396a(a)(10)(B)(i); 42 C.F.R. § 440.230(b), (c)).

36: All Documents regarding any report, research, or analysis by or on behalf of Defendants and/or the State of Florida on whether the Challenged Exclusion complies with the Medicaid Act's Early and Periodic Screening, Diagnostic and Treatment Services requirements (42 U.S.C. §§ 1396a(a)(10)(A), 1396a(a)(10)(43), 1396d(a)(4)(B), 1396d(4)).

37: All Documents regarding any report, research, or analysis by or on behalf of Defendants and/or the State of Florida on whether the Challenged Exclusion complies with Section 1557 of the Affordable Care Act's prohibition on unlawful discrimination on the basis of sex (42 U.S.C. § 18116).

38: All Documents regarding any report, research, or analysis by or on behalf of Defendants and/or the State of Florida on whether the Challenged Exclusion might violate the Equal Protection Clause of the Fourteenth Amendment of the U.S. Constitution.

39: All Documents regarding any report, research, or analysis by or on behalf of Defendants and/or the State of Florida on whether the Challenged Exclusion might violate any state or federal anti-discrimination laws.

Defendants' Response to Requests Nos. 35-39:

Defendants object to this request. The time period of the request, between January 1, 2015 to present, is overly broad, in that Rule 59G-1.050(7) was promulgated in 2022. In addition, the request seeks documents from Defendants concerning Defendants' analysis of whether it has complied with federal law. Any such analysis would have been within the purview of the Defendants' General Counsel and is therefore, by its very nature, is subject to the attorney-client privilege and the work product doctrine. Any such documents—should they exist—would be listed on Defendants' privilege log, which they will provide during the week of January 9, 2023. The time frame would be from January 1, 2022 to September 7, 2022, the date Plaintiffs' complaint was filed.

Plaintiffs Request No. 40:

All Documents demonstrating the medical efficacy of the treatments identified in the Challenged Exclusion including any analysis, research, interviews, studies or other materials that Defendants reviewed or relied upon before implementing the Challenged Exclusion.

Defendants' Response to Request No. 40:

Please refer to the response to Request No. 6. This will be further supplemented with Defendants' expert disclosures, which are due consistent with the Court's scheduling order.

Plaintiffs' Request No. 47:

All Documents reviewed, considered, or relied upon by expert witnesses retained by Defendants or witness(es)/Person(s) who provided a declaration on Defendants' behalf in connection with this action.

Defendants' Response to Request No. 47:

Defendants object to this request. The phrase "[a]ll Documents reviewed, considered, or relied upon" is overly broad. The documents used to formulate expert opinions were previously disclosed to Plaintiffs as part of the reports. See ECF No. 49. The experts were also provided the GAPMS Memo, which itself references many studies and scientific papers that are equally accessible to Plaintiffs, and the materials Plaintiffs provided with their motion for preliminary injunctions. There are no documents responsive to the lay witnesses who provided declarations on Defendants' behalf.

III. DEFENDANTS FAIL TO MEET THEIR DISCOVERY OBLIGATIONS

A. Imposition of Unreasonable Time Limitations (Request Nos. 3-5, 8, 10, 11, 13-15, 17, 19, 25-26, 33, 41-43, 52, 54-55)

For many of Plaintiffs' requests, Defendants refuse to even search for responsive documents that existed before January 1, 2022. Defendants' reasoning

is that the Challenged Exclusion and related guidance issued by various Florida agencies were promulgated in 2022 and thus no relevant documents could possibly have existed any time before January 1, 2022.

The fact that the Challenged Exclusion was implemented in 2022 is not a basis to limit the production to that year alone. Plaintiffs are entitled to discover when discussions or diligence regarding the Challenged Exclusion began and the nature of those discussions. Defendants' own privilege log strongly suggests that such diligence was underway before 2022. (*See* Ex. 3, rows 2-5.) And, as noted above, ACHA has covered gender-affirming care for Medicaid recipients long before 2022. Prior to issuing coverage, AHCA presumably would have (and appears to have) reviewed and documented the experimental or investigational nature of gender-affirming care. Defendants' stated objection bears no relevance to the discoverability of documents; they have failed to articulate any reasonable basis for narrowing the scope in such an unreasonable manner. *Cf. F.D.I.C.*, 291 F.R.D. at 678 (approving a ten-year period for discovery).²

² During the parties' meet-and-confer discussions, Defendants' counsel reasoned that Defendants had already completed their document searches and that it would be too burdensome for Defendants to replicate those searches as to earlier years. This burden is entirely self-imposed, as counsel could have looked for documents from earlier years during their initial searches rather than gamble that the Court would agree that this case is only about AHCA in 2022.

Similarly, Defendants' internal communications, communications with its Managed Care Plans,³ and communications with Medicaid recipients about the services and treatments at issue before 2022 are directly relevant to whether the care at issue is, indeed, medically necessary or otherwise experimental. (Request Nos. 10, 11, 33, *supra*, at 9-11, 13.) Emails or other information in Defendants' possession created prior to 2022 that indicate that the now-excluded treatments are safe, effective, and medically necessary to treat gender dysphoria would certainly be relevant and persuasive.

Defendants even object to producing documents that they rely upon in support of their admissions, denials, and responses to interrogatories that were generated before 2022. (Request Nos. 54, 55, *supra*, at 10-11.) But certainly, this information is directly relevant given they themselves rely on it. The "requested information is relevant to Plaintiff[s'] claims, and its production is not unduly burdensome." *Sec. Pest Control, Inc. v. Wells Fargo Bank, Nat'l Ass'n*, 339 F.R.D. 303, 311 (M.D. Ala. 2020) (requiring production of documents supporting Defendant's denials of Plaintiff's Requests for Admission).

Defendants narrow time limit is particularly unreasonable given the nature of

³ Managed care plans are entities that contract with AHCA to provide covered services to people enrolled in Medicaid. See Fla. Stat. 409.962(10).

the agency determinations at issue in this case. The GAPMS process that Defendants relied on to assess and issue the Challenged Exclusion can take as much as two years, (Ex. 4, at 2), meaning the process could have started as early as 2020. Additionally, in 2016, AHCA engaged in an earlier GAPMS process related to the coverage of “Puberty Suppression Therapy,” which is one of the services subject to the Challenged Exclusion (Ex. 5.) And in the 2016 GAPMS memo, AHCA concluded that “the Agency cannot categorically exclude this treatment.” (*Id.*) At a minimum, a timeline beginning in 2015 is reasonable in light of AHCA’s own actions.

Defendants further argue that this time frame is overly burdensome. But they have failed to provide any specific explanation, let alone an affidavit, as to why it is unreasonable or unduly burdensome to produce documents related to and communications with third parties involved in the GAPMS process and rule promulgation process outside of this one year time period. (Requests 3-5, 8, 13-15, 17, 25, 26, 41-43, 52, *supra* at 8-11.) *See Kennedy v. McKnight*, No. 17cv14041, 2017 WL 4654446, at *1 (S.D. Fla. Oct. 17, 2017 (requiring an explanation “with particular and specific demonstration of fact and cannot rely on simply conclusory assertions about the difficulty of complying with a discovery request”)); *Premier Anesthesia, LLC v. Bethesda Mem’l Hosp., Inc.*, No. 08cv80498, 2009 WL 10667475, at *1 (S.D. Fla. Feb. 4, 2009) (requiring proof through an affidavit);

Coker v. Duke & Co., 177 F.R.D. 682, 686 (M.D. Ala. 1998) (“A mere showing of burden and expense is not enough.”). Defendants’ conclusory objection is insufficient.

B. Refusal to Search Plaintiffs’ Terms (Request No. 33)

While Request No. 33 sets forth several search terms to be applied to Defendants’ communications, Defendants only agree to search one of those terms: “gender dysphoria.” Defendants refuse to search “transgender,” “gender reassignment,” “sexual reassignment,” “gender-affirming,” “gender affirming,” “gender transition,” “medical transition,” “social transition,” transsexual,” or “sex change.” (*Supra* at 13.) Defendants justify their unilateral gutting of Request No. 33 by reasoning that the terms “transgender,” “gender-affirming,” and “gender affirming,” and those terms alone, yield an excessive number of results in their systems. Defendants remain steadfast in this position despite multiple attempts by Plaintiffs to assist Defendants in making this search manageable, including Plaintiffs’ concessions to narrow the search to a specific list of custodians and Plaintiffs’ attempts to schedule a meeting between the parties’ respective IT representatives. (Ex. 1, at 5-6).⁴

⁴ Defendants’ correspondence dated January 12, 2023 indicates that they will conduct a terms and connector search if Plaintiffs provide search terms and custodians. The letter overlooks the fact that Plaintiffs did narrow their request for

Defendants' position as to Request No. 33 plainly violates not only the letter of the federal discovery rules but their spirit as well. As an initial matter, for each search term Defendants believe is overly burdensome, they must point to evidence supporting their objection. *L-3 Commc'ns Corp. v. Sparton Corp.*, 313 F.R.D. 661, 670 (M.D. Fla. 2015). And, "if asked, Defendants must offer specific suggestions for narrowing the offending search terms in a way that addresses their concerns while still retrieving as many of the relevant documents targeted by the disputed search terms as possible." *Id.*

Despite Plaintiffs' efforts to find ways to make the search for their terms manageable, Defendants have failed "to confer in good faith with opposing counsel in an effort to resolve or at least narrow the scope of a discovery dispute" and have instead unilaterally refused to conduct a search. *Id.* Defendants have provided *no evidence* that performing these searches is unreasonable or that they yield an unduly burdensome volume of material, and Defendants have failed to otherwise articulate any legitimate basis in refusing the requested search.

C. Inadequate Explanation for Nonproduction of Gender Dysphoria Coverage Criteria (Request Nos. 21 and 24)

the search terms to a list of custodians (Ex. 1, at 5-6) and Defendants have not amended their Response or agreed to conduct a search using those custodians and search terms.

Documents demonstrating Medicaid's policies, procedures, and criteria regarding the services and treatments at issue in this case prior to the promulgation of the Challenged Exclusion are directly relevant to whether the care at issue is medically necessary or otherwise experimental. However, in response to Plaintiffs' request for all guidance on the medically necessary standard and its application to gender dysphoria, Defendants merely hyperlink Plaintiffs to the Florida Medicaid Definitions Policy, which sets forth a general definition for medically necessary. (Request No. 21, *supra* at 12-13 ["The information that this request seeks is publicly available.].) Defendants point to this same document in response to Plaintiffs' request for AHCA's criteria for coverage of treatments and services for Gender Dysphoria prior to the Challenged Exclusion. (Request No. 24, *supra* at 12-13.)

Defendants' response fails to explicitly state that no other responsive documents exist besides the Definitions Policy. Fortunately for Plaintiffs, there exists at least one relevant 2016 AHCA pharmacy coverage policy that provides the criteria for coverage of puberty suppression therapy, a copy of which was sent as an exemplar to AHCA's general counsel after the December 30, 2022, meet and confer. (Ex. 1, at 5.) This policy was included in the most recent production, but based on Defendant's evasive answer, Plaintiffs cannot be assured that all such policies have been searched for or produced.

Defendants' position here turns this case into "a game of blind man's bluff" instead of "a fair contest with the basic issues and facts disclosed to the fullest practicable." *See Odom v. Roberts*, 337 F.R.D. 359, 362 (N.D. Fla. 2020) (quoting *United States v. Procter & Gamble Co.*, 356 U.S. 677, 682, 78 S. Ct. 983, 986–87 (1958)); *see also Pitts*, 2008 WL 2229524, at *2 ("An evasive or incomplete answer to a request for production is to be treated as a failure to answer.").

Defendants' failure to conduct a diligent search of AHCA's records falls short of the standard set by the Federal Rules of Civil Procedure. *See Waddell*, 2021 WL 9781801, at *2. Defendants have presented no objections to these Requests and thus any objections are waived. *See Pitts*, 2008 WL 2229524, at *2. Defendants must make a reasonable and complete search for the requested documents and produce all responsive materials.

D. Refusal to Produce Documents Evidencing Defendants' Scientific Inquiry (Request Nos. 6-7, 16, 40, 47).

Through the GAPMS process and the Challenged Exclusion, Defendants have concluded that gender-affirming care is experimental and investigational. Plaintiffs seek the documents that Defendants reviewed that result in their reaching that conclusion, and Defendants respond by directing Plaintiffs to the GAPMS Memo, which "endeavors" to contain all such responsive information. (Request Nos. 6 and 7, *supra* at 11-12) (documents considered in promulgating the GAPMS Memo and

the Challenged Exclusion); No. 16, *supra* at 11-12 (documents relied upon in considering if gender-affirming care is consistent with generally accepted professional medical standards); No. 40, *supra* at 15 (documents demonstrating the medical efficacy of gender-affirming care); No. 47, *supra* at 15 (documents considered by the GAPMS Memo attachment authors).

Defendants' responses are problematic for two reasons. First, the GAPMS Memo does not contain the actual sources upon which it relied; it only contains descriptions of some of those sources and a Works Cited page, in addition to the sham assessments included as attachments. Defendants force Plaintiffs to undertake Defendants' discovery duties without an adequate explanation of why Defendants cannot produce these documents themselves. Defendants' position here amounts to an "equally available" objection, which is not well taken in this Court. *All. of Auto. Manufacturers, Inc. v. Jones*, No. 4:08cv555, 2014 WL 12848659, at *9 (N.D. Fla. Jan. 7, 2014) ("[C]ourts have unambiguously stated that this exact objection is insufficient to resist a discovery request."). Defendants must produce these sources or explain why they cannot.⁵

Second, Defendants' position that the GAPMS Memo "endeavors" to reflect

⁵ Defendants' position calls into question whether Defendants ever had copies of each document cited in the GAPMS Memo's Works Cited section before relying on the purported content of those documents.

all responsive information is a concession that the GAPMS Memo does not reflect the entire universe of medical information that Defendants and their experts considered regarding the efficacy of gender-affirming care. Meanwhile, Defendants refuse to produce or identify this information and have not agreed to stipulate that no other responsive documents exist beyond those identified in the GAPMS Memo.⁶ Plaintiffs' case here is that Defendants' process was wrong and reached the wrong scientific conclusion. Thus, Plaintiffs are entitled to discover the details about how Defendants reached this conclusion, information which is very relevant to this case and should not be an undue burden to produce. *See Sec. Pest Control, Inc.*, 339 F.R.D. at 311.

E. Improper Assertion of Privilege

1) Adequacy of Privilege Log

Defendants have produced a privilege log that is comprised of 583 entries that in most cases fail to provide sufficient information to allow Plaintiffs to assess the applicability of any privilege. A privilege log is the starting point for asserting a claim of privilege, but this log should also “be supported by affidavit or other evidence identifying each document or communication claimed to be protected by

⁶ Plaintiffs' Second Interrogatory Nos. 5 and 8 demanded that Defendants identify these same documents but Defendants again solely referred to the GAPMS Memo.

the privilege and setting forth sufficient facts to allow a judicial determination as to whether the particular communication or document is, in fact, privileged.” *Purdee v. Pilot Travel Centers, LLC*, No. 4:07cv028, 2008 WL 11350099, at *1 (S.D. Ga. Feb. 21, 2008). The standard for testing the adequacy of the privilege log is “whether the descriptive portion of the log” establishes each element of the privilege or immunity that is claimed. *LeBlanc v. Coastal Mech. Servs., LLC*, No. 04cv80611, 2005 WL 8156080, at *7 (S.D. Fla. Mar. 22, 2005) (“the burden of the party withholding documents cannot be “discharged by mere conclusory or *ipse dixit* assertions”).

For the vast majority of entries, Defendants support the applicability of privilege by providing a three-to-four-word summary of the contents in addition to the identities of the participants. (*See, e.g.*, Ex. 3, line 345 [“Email between General Counsel's office staff regarding board proposal.”].) This is insufficient. *See Lincoln Nat'l Life Ins. Co. v. Biviano*, No. 09cv82447, 2011 WL 13108073, at *4 (S.D. Fla. Apr. 13, 2011) (rejecting privilege log that contained entries like “e-mail regarding claims process” and “letter regarding complaint and litigation”). Moreover, in most cases Defendants fail to provide identify or describe the attachments to the various emails, simply noting that an attachment to an email exists while repeating the verbatim description of the email’s contents. Next, Defendants’ log contains

numerous entries with placeholder or plainly inaccurate dates. (*See, e.g.*, Ex. 3, line 584 [May 16, 2023 “Text message between Jason Weida and EOG General Counsel’s Office regarding expert reports for ongoing litigation”].) And there are four entries in the log where no privilege is asserted at all. (Ex. 3, rows 143-146.)

As such, Defendants fail to provide adequate information to as to each element of their privilege assertions, which prevents Plaintiffs from effectively challenging those assertions. The Court should require that Defendants supplement their privilege log to address these deficiencies.

2) Attorney-Client Privilege

The attorney-client privilege exists to protect confidential communications between client and lawyer made for the purpose of securing legal advice. *In re Grand Jury Matter No. 91-01386*, 969 F.2d 995, 997 (11th Cir. 1992). In order to claim attorney-client privilege, the proponent of the privilege must prove that what is sought to be protected is (1) a communication (2) made between privileged persons (3) in confidence (4) for the purpose of obtaining or providing legal assistance for the client. *Diamond Resorts U.S. Collection Dev., LLC v. US Consumer Att’ys, P.A.*, 519 F. Supp. 3d 1184, 1197 (S.D. Fla. 2021). No privilege attaches to a communication made in the presence of a third party, unless the agency exception applies. *Id.* at 1198-99. For the agency exception to apply, “the third

party's involvement must be reasonably necessary for the effective representation of the client." *Id.* at 1199 (internal quotations and citations omitted).

Defendants cite attorney-client privilege in many instances where it is inapplicable, such as emails between AHCA personnel, AHCA general counsel, and third parties, including individuals retained to serve as experts or professional witnesses in the rule promulgation process, and their attachments, which is distinct from any experts retained for the purposes of litigation. (Ex. 3, rows 33, 38-39, 42, 45-50, 59-60, 63-64, 79, 94, 360-377, 380-382, 392, 398, 406.) These third parties were used by AHCA to support the promulgation of the Challenged Exclusion, not to further the attorney-client relationship or for the purpose of giving legal advice. Put simply, the attorney-client privilege protects confidential communications related to the provision of legal advice; it does not protect communications with outside consultants who services are being rendered not to provide legal advice but rather their medical advice pertaining to gender dysphoria. *See Andritz Sprout-Bauer, Inc. v. Beazer E., Inc.*, 174 F.R.D. 609, 633 (M.D. Pa. 1997) ("Only communications made for the express purpose of obtaining or giving legal advice are protected. The contents of the communication determine whether the privilege applies."); *see also In re Int'l Oil Trading Co., LLC*, 548 B.R. 825, 834 (Bankr. S.D. Fla. 2016).

AHCA further asserts the attorney-client privilege as to emails between AHCA Deputy Secretary and the Governor's office. (Ex. 3, rows 161-164, 167-168, 173-174, 213-214, 396, 493, 536). Communications between a state agency official and general counsel for a different state agency, or between attorneys for two different state agencies, are not covered by the attorney-client privilege. *See Lincoln Nat'l Life Ins. Co. v. Biviano*, No. 09cv82447, 2011 WL 13108073, at *4 (S.D. Fla. Apr. 13, 2011) (finding fault in privilege proponent's failure to explain how a privilege could exist between an attorney at one entity and a lay person at another entity); *Universal City Dev. Partners, Ltd. v. Ride & Show Eng'g, Inc.*, 230 F.R.D. 688, 693 (M.D. Fla. 2005) (no attorney client privilege in communications between two outside attorneys regarding litigation strategy to employ on the client's behalf).

Similarly, AHCA cites the attorney-client privilege to withhold communications and documents circulated among AHCA general counsel or with the Department of Health General Counsel regarding a Department of Health proposal/petition for rulemaking. (Ex. 3, rows 343-357, 414-415, 491-492.) Like the communications with the Governor's office above, the Department of Health is not AHCA's client, and there can be no attorney-client privilege where there is no client involved. *See Universal City Dev. Partners*, 230 F.R.D. at 693. And where these communications were between general counsel for each agency, no attorney-client

privilege exists either. *Lincoln Nat'l Life*, 2011 WL 13108073, at *4.

3) Work Product Privilege

The proponent of the work product privilege must prove that the document was “prepared with the primary motivating purpose of aiding in possible litigation.” *Wyndham Vacation Ownership, Inc. v. Reed Hein & Assocs., LLC*, No. 6:18cv2171, 2019 WL 9091666, at *15 (M.D. Fla. Dec. 9, 2019). It is not enough that future litigation was “certainly possible,” that the document “may also be helpful in the event of litigation,” or that it was prepared “with an eye toward litigation.” *Id.* at *14-15. Here, Defendants bears the burden of establishing protection by a preponderance of the evidence, and they must “provide the Court with underlying facts demonstrating the existence of the privilege.” *Diamond Resorts*, 519 F. Supp. 3d at 1200. In this case, rule promulgation is ordinary agency business, and documents prepared in the ordinary course of business or other non-litigation purposes are not protected as work product. *See U.S. Fid. & Guar. Co. v. Liberty Surplus Ins. Corp.*, 630 F. Supp. 2d 1332, 1336 (M.D. Fla. 2007).

Defendants cite the work product privilege to withhold January and March 2022 emails circulated among AHCA General Counsel staff and the attached “Medicare and Medicaid Decision Memo for Gender Dysphoria.” (Ex. 3, rows 2-12.) The fact that “an agency document was written by a lawyer does not necessarily

make it ‘work product.’” *Kent Corp. v. N.L.R.B.*, 530 F.2d 612, 623 (5th Cir. 1976). The work product privilege does not extend to attorneys acting in primarily political or policy roles on behalf of a government agency. *Texas v. United States*, 279 F.R.D. 24, 33 (D.D.C. 2012) (“Texas has failed to show that [its attorneys] were acting in a primarily legal role as map-drawers instead of in political or policy roles, as to which no work-product doctrine would apply in any event.”). These emails were exchanged months prior to the rule promulgation, and Defendants do not provide a sufficient basis to determine whether the communications and attached memo were prepared in anticipation of litigation or in anticipation of the rule promulgation. *See Diamond Resorts*, 519 F. Supp. 3d at 1213 (finding party failed to meet its burden to establish work product privilege where it stated that the document was prepared “in anticipation of litigation” but did not provide why the communication was in furtherance of a litigation effort).

Defendants also attempt to withhold communications and document drafts circulated with and about “experts,” but the timing of these communications and the identities of these persons suggests that these “experts” were the individuals who submitted attachments to the June 2022 GAPMS Memo (ECF 49-1, at 5-183, ECF 49-2, at 1-61), and who appeared as panelists at the rule hearing held on July 8, 2022 (ECF 1, at ¶ 107), not experts retained for the purposes of litigation. (*See Ex. 3,*

rows 27-146, 175-176, 279, 283-286, 289, 340, 342.) These communications all occurred from April 2022 through July 2022, prior to the effective date of the Challenged Exclusion, *see* Fla. Admin. Code R. 59G-1.050, and involved Romina Brignardello-Petersen, James Cantor, Quentin Van Meter, Patrick Lappert, Kevin Donovan, Andre Van Mol, and Miriam Grossman.

Defendants also seek to assert privilege with respect to communications and documents involving a “consultant regarding GAPMS Report” (Ex. 3, rows 217-218), draft scripts for the July 8, 2022 hearing (*id.*, rows 219-252), and emails, both internal and with the above-mentioned outside experts, regarding public comments to the proposed rule (*id.*, rows 321-339, 360-376, 377, 380-382, 392, 398, 406). Defendants further assert work-product privilege as to a series of internal communications and correspondence with experts about an “AAP White Paper.” (Ex. 3, rows 253-278.) Defendants fail to make the proper showing that these communications and documents were made in anticipation of litigation rather than as a part of the rule promulgation process. *See P. & B. Marina, Ltd. P'ship v. Logrande*, 136 F.R.D. 50, 58 (E.D.N.Y. 1991), *aff'd sub nom. P&B Marina Ltd. v. LoGrande*, 983 F.2d 1047 (2d Cir. 1992) (refusing to extend the work product privilege to letters and memoranda related to administrative actions).

Notably, while some of these communications had AHCA general counsel or

outside counsel as a recipient or cc'd, very few of these emails were written by an attorney. Instead, the vast majority were between AHCA non-attorney staff and the “experts,” at times without an attorney included in the correspondence at all. Clearly, these communications do not reflect an attorney’s mental impressions, conclusions, opinions, or legal theories, which are entitled to heightened protection. *See Cox v. Adm’r U.S. Steel & Carnegie*, 17 F.3d 1386, 1422 (11th Cir. 1994).

AHCA further asserts the work product privilege as to emails between and AHCA Deputy Secretary and the Governor’s Office. (Ex. 3, rows 161-164, 167-168, 173-174, 213-214, 396, 493, 536). The mere fact that an email is titled “Privileged & Confidential” or that it discusses case law, legal developments, similar litigation, an amicus brief does not make it privileged. To be work product, the document or communication must be prepared in anticipation of litigation, and Defendants fail to specify how the primary purpose of these documents was to further a litigation effort. *See Diamond Resorts*, 519 F. Supp. 3d at 1213.

Similarly, AHCA cites the attorney-client privilege to withhold communications and documents circulated among AHCA general counsel or with the Department of Health General Counsel regarding a Department of Health proposal/petition for rulemaking. (Ex. 3, rows 343-357, 410-412, 491-492.) These communications involve rulemaking, normal business of the Agencies, and not

litigation, and thus the work product privilege would not apply. *See P. & B. Marina, Ltd. P'ship v. Logrande*, 136 F.R.D. at 58. And to the extent that the entries purport to be “in anticipation of litigation,” Defendants fail to adequately support a claim of privilege by demonstrating that the purpose of the communication was to further a litigation effort. *See Diamond Resorts*, 519 F.Supp.3d at 1213.

IV. PLAINTIFFS’ MOTION REQUIRES A PROMPT RULING

Due to Defendants insufficient production of documents and improper assertions of privilege, Plaintiffs are and will continue to be prejudiced in their ability to complete fact discovery in a timely manner. Due to the impending discovery deadline of February 7, 2023, and Rule 30(b)(6) deposition scheduled for February 1, 2023, Plaintiffs seek “a ruling more promptly than would occur in the ordinary course of business.” *See* N.D. Fla. Local Rule 7.01(L). Though this Motion is not labeled as an “Emergency,” Plaintiffs will orally advise the Clerk’s office that the motion seeking an expedited briefing schedule and ruling has been filed. *Id.* Even with an expedited ruling, a motion to extend the February 7, 2023, deadline for fact discovery so that it is coextensive with expert discovery may be needed.

V. CONCLUSION

Defendants fail to produce documents that are both relevant and proportional to the needs of the case and, in many instances, even refuse to conduct an appropriate

search to identify responsive documents and materials. They improperly cite attorney-client and work product privileges to withhold non-privileged, discoverable documents. By evading their discovery obligations, they delay and impede plaintiffs' ability to prosecute their case. For the foregoing reasons, Plaintiffs respectfully request that this Court grant their Emergency Motion to Compel and order an expedited briefing and ruling schedule.

Certificate of Conferral

Counsel for Plaintiffs conferred with Defendants counsel during telephone conferences on December 30, 2022, and January 5, 2023, and through correspondence on December 22, 27, 2022, and January 4, 5, 9, 10, 11, and 13, 2023, but were unable to resolve the issues addressed in this Motion.

Dated: January 20, 2023

Respectfully Submitted,

/s/ Chelsea Dunn

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of January, 2023, a true copy of the foregoing has been filed with the Court utilizing its CM/ECF system, which will transmit a notice of electronic filing to counsel of record for all parties in this matter registered with the Court for this purpose.

CERTIFICATE OF WORD COUNT

As required by Local Rule 7.1(F), I certify that this Motion contains 7,103 words.

/s/ Chelsea Dunn
Attorney for Plaintiffs



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January 9, 2023

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Re: *Dekker v. Marsteller*, Case No.
Defendants' Responses to Plaintiffs First Requests for Production

Dear Counsel,

To follow up from the meet and confers held on December 30, 2022, and January 5, 2023, we write to address issues and insufficiencies in Defendants' Responses to Plaintiffs Requests for Production, as updated by Defendants' Amended Requests for Production, served on January 6, 2023.

- 1) **Defendants have limit the time frame for Plaintiffs' Requests without any grounds for doing so beyond asserting "their" idea of the relevant timeline.**
 - a. Relevant to Responses to Requests 3, 4, 5, 8, 9, 10, 11, 12, 13 14, 15, 17, 18, 19, 25-33, 35-39, 41, 42, 43, 46, 52, 54, 55
 - b. Issues: The Exclusion being promulgated in 2022 does not bear relevance to our ability to receive responsive documents outside of that time frame. Plaintiffs cannot rely on Defendants' representations about what time frames are relevant to their

inquiry—Plaintiffs don't know when ACHA first started looking into this process and need information about the process before this iteration of it to inform prosecution of the Plaintiffs case. Further, documents demonstrating Medicaid's handling of claims for or policies and procedures regarding the relevant treatments prior to the promulgation of the rule are certainly relevant to this case. If search beyond 2022 for responsive documents nets nothing, that's one thing, but that's not what has happened here, Defendants are refusing to produce responsive documents beyond this year which is improper. Plaintiffs know such a search is not impossible because Defendants have agreed to do so for Requests 28-32, though Plaintiffs object to the limitation on those requests as well not going back to 2010.

- c. For the following requests, we stand by our original timelines and request that Defendants search for and produce all documents since January 1, 2015.
 - i. Request Nos. 11 & 12: The fact that the rule was promulgated in 2022 is not relevant to this request. Plaintiffs are entitled to documents demonstrating how Medicaid was handling claims for these services prior to the Challenged Exclusion and any communications with CMS for these services.
 - ii. Request Nos. 18 & 19: Defendant's limitation is particularly problematic for these requests, which seek documents, criteria, and communications from Managed Care Orgs about Medicaid coverage of Gender Dysphoria. Plaintiffs need to understand documents and communications being exchanged between AHCA and the MCOs about this type of care before the challenged exclusion went into effect.
 - iii. Request No. 33: We do not agree to Defendant's limitation on the time frame and maintain our request for documents from 2015 to present. Communications that reflect how AHCA was handling coverage of treatment and services for gender dysphoria prior to the promulgation of the current rule are relevant and proportional to the needs of the case.
 - iv. Requests Nos. 35-39: Defendants' responses do not make it clear whether there are any responsive documents. Defendants have raised objections based on privilege and an overly broad time period. To the extent that there are documents which are protected by privilege, please provide a privilege log

(and see below). If there are no documents please state as much. We do not believe narrowing of the time frame is warranted for these requests.

- v. Request No. 46: Plaintiffs are entitled to all documents in the possession of AHCA related to their own Medicaid coverage. We do not agree to Defendants time limitation.
 - vi. Request No. 54 & 55: Defendant's objection and narrowing of the time frame for this request is entirely frivolous. Plaintiffs are entitled to any non-privileged documents Defendants are relying upon in support of their admissions or denials of any of the allegations contained in the complaint, or their responses to any interrogatory or request for admission, regardless of date.
- d. Plaintiffs believe that the time frame for their requests is relevant and proportional to the needs of the case. However, in the interests of moving forward with discovery, we will agree to the following narrowed timelines, without waiving the right to follow up on our original request if it is determined after reviewing documents produced that there is a relevant line of inquiry that falls outside of these narrowed timelines.
- i. Request Nos. 3-5: Defendants state that they will produce all non-privileged responsive documents, and then state that the time period of these documents is January 1, 2022 to September 7, 2022. Please clarify whether this means that the only documents that exist are within this time frame, or whether Defendants are only producing documents within this time frame.
 - ii. Request Nos. 8, 10, 13, 14, 15, 17: we agree to narrow the timeline to January 1, 2021 to present. While it may be that there are no documents to produce from 2021, Defendants can indicate as much in their response rather than unilaterally limiting the time frame.
 - iii. Request Nos. 25 & 26: we agree to narrow the timeline to January 1, 2020 to present. While it may be that there are no documents to produce from 2020 or 2021, Defendants can indicate as much in their response rather than unilaterally limiting the time frame.
 - iv. Request Nos. 27 – 32: we agree to limit the time frame to begin on January 1, 2012.

- v. Request Nos. 41-43, 52: we agree to narrow the timeline to begin on January 1, 2021. While it may be that there are no documents to produce from 2020 or 2021, Defendants can indicate as much in their response rather than unilaterally limiting the time frame.

2) Attorney Client Privilege and Work Product Objections are Improper

- a. Rule 502 defines (1) “attorney-client privilege” as the protection that applicable law provides for confidential attorney-client communications; and (2) “work-product protection” as the protection that applicable law provides for tangible material (or its intangible equivalent) prepared in anticipation of litigation or for trial. Defendants assert attorney-client privilege for many requests related to individuals with whom, to Plaintiffs’ knowledge, there is no an attorney-client relationship. They also cite work product protection in response to requests that seek a much broader set of documents than just documents reflecting the mental impressions or litigation strategy and that cover material that was not created in anticipation of trial, but rather was created in the interest of promulgating the exclusion. Plaintiffs are entitled to documents related to the rule promulgation but will wait until receiving Defendants’ privilege log before addressing specific objections.

3) Offering Non-Responsive, Publicly Available Information Rather than Relevant, Responsive Coverage Policies and Guidelines (Requests 6, 7, 9, 16, 20, 21, 24, 27)

- a. Request Nos. 6, 7, 16, and 40 : Defendants have also referred to the GAPMS memo in response to requests about all data and reports presented, relied upon, reviewed, and considered by Defendants in connection with the development and promulgation of the GAPMS Memo.
 - i. Defendants’ response suggests that nothing was considered beyond what is included in or attached to the GAPMS memo, so Plaintiffs expect that Defendants will agree to a stipulation that they did not review any other data, reports, or evidence except what is included in the GAPMS memo.
- b. Request Nos. 20, 21, & 24: In response to a request for all guidance on the medically necessary standard and its application to gender dysphoria (Requests 20 and 21), Defendants have pointed to their publicly available [definition](#) only. Defendants point to this same document in response to our request for AHCA’s criteria for covering relevant treatments prior to the Challenged Exclusion.

- i. This response is entirely deficient. There are two sets of documents that Plaintiffs seek by these requests: (1) policies and guidelines setting forth criteria for coverage of the listed treatments and services developed by AHCA and disseminated to the MCOs or to other third parties; and (2) policies and guidelines setting forth criteria for coverage of the listed treatments and services developed by the MCOs and used to justify coverage decisions in, for example, Medicaid Fair Hearings or Plan Appeal Resolutions. We are aware of at least two such policies, copies of which have been sent to AHCA general counsel as exemplars.

4) Search Terms

- a. Request 33: Defendants refuse to do a general search for communications with our list of terms. (Request 33). They will only produce communications with the term “gender dysphoria.” Defendants may not unilaterally determine the scope of discovery particularly when Plaintiffs have provided narrowly tailored list of search terms relevant to the issues at hand in this case.
- b. Based on our discussion on 1/5/23, General Counsel for AHCA was to provide additional information about the results of the search for “transgender” that was so massive that it could not be processed. General Counsel for AHCA was to also provide information about the results of the remaining search terms (gender reassignment,” “sexual reassignment,” gender-affirming,” “gender affirming,” “gender transition,” “medical transition,” “social transition,” transsexual,” or “sex change).
- c. The information promised has not been provided, however. Instead, Defendants have amended their response to indicate that searching two of plaintiffs search terms, “gender-affirming” and “gender affirming,” also lead to “an excessive number of results.”
- d. Plaintiffs provide the following list of potential custodians to expedite production of the requested communications, without waiving the right to follow up on our original request if it is determined after reviewing documents produced that there are other relevant custodians. Plaintiffs also request that a meeting be scheduled with each parties’ respective IT representatives to determine if there is a way to make the production of emails production more manageable.

- i. Custodians:
 1. Matthew Brackett
 2. Nai Chen
 3. Ann Dalton
 4. Cody Farrill
 5. Cole Giering
 6. Shena Grantham
 7. Kim Kellum
 8. Simone Marsteller
 9. Devona Pickle
 10. Andrew Sheeran
 11. Josefina Tamayo
 12. Tom Wallace
 13. Jason Weida
 14. Jeffrey English
 15. Christopher Cogle
 16. Richard Shoop
 17. John Matson
 18. Jesse Botcher

5) Defendants refuse to produce AHCA’s directories and organizational charts. (Request 34).

- a. The current organizational chart was promised at the January 5th meet & confer. Now, Defendants equivocate about whether or not it will be produced. We expect that the current organizational chart will be produced on January 13, 2023.

6) General Insufficiencies in Other Responses

- a. Request Number 2: Documents evidencing the total number of Florida Medicaid recipients who have diagnoses of Gender Dysphoria
 - i. Response “Defendants do not have a document that states the total number of Florida Medicaid recipients who have been diagnosed with gender dysphoria.”
 1. Plaintiffs asked for “documents” plural, not singular. We seek any documents indicating a Medicaid beneficiary has a diagnosis of gender

dysphoria, which would include any summaries or reports showing coverage for a service or treatment being offered to treat a diagnosis of gender dysphoria. Plaintiffs seek any such documents, in addition to those described in Defendants' amended response.

- b. Request No. 46: Defendant asserts that Plaintiffs were provided their Medicaid files during the preliminary injunction hearing. Plaintiffs do not believe they were given complete copies of each Plaintiffs' Medicaid file and would ask Defendants to ensure that this is the case, and if so, to please indicate in their Response that there are no additional documents to provide.

7) Defendants refuse to produce docs relied on by their experts. (Request 47).

- a. Plaintiffs are asking for the documents, not Defendants' counsel communications with their clients about those documents. These are not protected by attorney client privilege. The fact that an expert has disclosed or listed the documents used in their report does not relieve Defendants from having to produce those documents.

8) Defendants refuse to produce documents related to interrogatory requests

- a. In Interrogatory Requests No. 6 & 8, Plaintiffs asked Defendants to identify all meetings related to the Challenged Exclusion, as well as all documents and materials relating to those meetings. Defendants have only agreed to identify the dates and attendees of such meetings through calendar invites, and not the documents. And Request No. 55 would require any documents used to prepare interrogatories to be produced. So this creates a deficiency in the response to Request No. 55. Knowing that a meeting happened doesn't satisfy this request. Defendants must produce the documents, materials, or notes related to these meetings. If Defendants intend to rely on their objection that this search would be "broad and burdensome," they must provide more details as to why it is broad and burdensome, rather than broad generalizations.

If Defendants do not amend their responses to address these insufficiencies by Thursday, January 11, 2023, Plaintiffs will have no choice but to seek court intervention.

Respectfully,

/s/ Chelsea Dunn
Counsel for the Plaintiffs

Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

January 12, 2023

Via E-Mail

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Re: Defendants' Response to Plaintiffs', Dekker, et al., v Jason Weida, et al.,
4:22-cv-00325-RH-MAF

Dear Counsel,

In this letter, I attempt to respond to your three separate emails and letters sent on January 10, 2022, and other concerns. If I have missed an issue, that is inadvertent.

1. AHCA recently received material from various health plans. My colleagues and I have not had a chance to review the material; however, I would like to produce the materials to you as soon as Monday, January 16, 2022, with "Confidential" and "Attorney Eyes Only" stamped on the pages consistent with the protective order in this case. *See* Doc.77 at pg. 5-6. To me, this ensures that AHCA does not inadvertently disclose material that it should not *and* that you have the material that you have requested. If you intend to publish some of the material at trial, or even to use it at the summary judgment stage, we can confer in good faith to remove the "Confidential" and "Attorney Eyes Only" designations. *Id.* at pg. 7. Please let me know if this approach works for you.
2. As I understand it, you are also asking for us to reproduce in native format the documents previously provided to you in PDF format. Your request for production states that "[w]henver possible, Documents created or stored in electronic format should be produced in the original, native electronic format," "[o]therwise, the Documents should be produced in a portable Document format (PDF)." First RFP at 10, ¶ 14. AHCA's team collected material in PDF format for my firm's review and for production to you with the understanding that PDF-based collection was a limitation of the agency's system. Though AHCA now has the capability of collecting documents in native format—an approach that my colleagues and I

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

would have also preferred—I have been informed that recollecting the documents in native format and reproducing them would be impractical; it would require AHCA to redo the work at substantial cost. Under the circumstances, the PDF production complies with Rule 34 and the instructions in your requests for production. *See, e.g., United States v. O’Keefe*, 537 F. Supp. 2d 14, 23 (D.D.C. 2008) (“production of the electronically stored information in PDF or TIFF format would suffice, unless defendants can show that those formats are not ‘reasonably usable’ and that the native format, with the accompanying metadata, meet the criteria of ‘reasonably usable’ whereas the PDF or TIFF formats do not”); *In re Seroquel Prods. Liab. Litg.*, 244 F.R.D. 650, 655 (M.D. Fla. 2007) (citing fourth edition of the manual for complex litigation). That said, if there are specific emails for which you believe the conversion to PDF format has made the material something other than “reasonably usable,” please let me know and, if there is a manageable number, AHCA will provide the emails in native format.

3. As previously stated, AHCA’s organizational chart is available at https://ahca.myflorida.com/Inside_AHCA/org_chart.shtml. Amd. Response RFP at pg. 37. If AHCA turns up some other organizational chart or directory, it will provide that chart or directory by January 13, 2023. *Id.* If AHCA creates a new organizational chart, it will post that chart on its website and notify you of the posting. As you know, however, AHCA does not have an obligation to create a new organizational chart for purposes of this litigation.
4. As counsel for the Plaintiffs, you are obviously more familiar with the Plaintiffs’ medical records. If you have seen any gaps in the Medicaid files AHCA previously provided, please let me know. No one is trying to hide the ball here. Some of the Plaintiffs may have changed residences and some may not have been on Medicaid until a certain year. AHCA is also double-checking its files and will supplement its response no later than January 20, 2023, if it finds any additional material.
5. For the temporal limitations applied in our amended response and the production, I note that the “question” “controlling here” is “whether, based on current medical knowledge, the state’s determination that [the excluded] treatments are experimental is reasonable,” which is an issue requiring expert testimony. Doc.64 at 4. That said, AHCA has now produced to you 7,453 documents totaling 289,214 pages of material. The material includes GAPMS-related reports other than the report central to this case, going as far back as 2015, when AHCA adopted its GAPMS rule. If you have a terms-and-connectors search you would like for AHCA to run outside of the temporal limitations detailed in response, for specific custodians, please provide that to AHCA. AHCA can let you know how many potentially responsive documents are returned and, if the list is manageable, AHCA can produce those documents to you.
6. Concerning the experts, AHCA intends to serve ten expert reports. The experts to whom you have served third-party subpoenas (and for whom my firm accepted the subpoenas) remain under contract with AHCA have been retained for this litigation. I share that information in the hope that it can streamline our discussions concerning objections, i.e., if they submit reports then you will have much of their relevant information and have an opportunity to depose them.

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7. For the AHCA depositions, my colleague, Gary Perko, understood the last meet-and-confer discussion on January 10, 2023 to have resulted in an understanding that you would depose Matt Brackett in his individual and 30(b)(6) capacity on February 1 and 2 respectively. Yet, later on January 10, 2023, Ms. Altman's office noticed Mr. Brackett's deposition for January 17, 2023 because no one had specifically said that the January 17, 2023 date does not work. While Robert Bolt's Thomas More may have said that "silence gives consent," in this instance, it does not. I ask that you withdraw the deposition for two reasons. First, Mr. Brackett is a key witness in the case and I would like to attend that deposition; however, I will be in an out-of-town mediation from January 17-20. Second, as noted above, in the last meet-and-confer, it is my understanding that there was general agreement that Mr. Brackett would have to carve out only two consecutive days for his depositions and those days would be February 1 and 2. The unilateral scheduling of one of those two depositions for a different date is burdensome for a high-level public servant's schedule.
8. For the Executive Office of the Governor, we can produce material within 14 days of you stipulating that you will not seek any depositions of personnel from the office. As discussed on December 30 and January 5, this is a precondition rooted in the fear of waiving certain institutional privileges noted with case citations in the Governor's responses and objections.
9. For the Surgeon General and the Department of Health, as noted in their responses and objections, the document requests are extremely broad and would require a great deal of time and effort for these third parties to sort through potentially responsive documents. This burden is unreasonable and disproportionate when, again, the "question" "controlling here" is "whether, based on current medical knowledge, the state's determination that [the excluded] treatments are experimental is reasonable." Doc.64 at 4. More fundamentally, if you would like for the Surgeon General and the Department of Health to conduct a limited, terms-and-connectors search, that is one thing. If you would like for them to provide discovery for a subsequent lawsuit that has not yet been filed, then that is inappropriate.

Finally, if the goal of the modern discovery rules is to ensure that "civil trials in the federal courts no longer need be carried on in the dark," *Hickman v. Taylor*, 329 U.S. 495, 501 (1947), then you will see from AHCA's material that you are not in the dark. The materials include documents that, perhaps, do not cast the challenged exclusions in the most favorable light. You will also have an opportunity to ask multiple AHCA employees about the materials and to then take expert depositions in a case that, per the Court's distillation of the issues, will turn on expert testimony.

As always, AHCA is happy to discuss the issues further.

Sincerely,



Mohammad O. Jazil

*Counsel for Secretary Weida and
the Agency for Health Care
Administration*

	A	B	C	D	E	F	G	H	I
1	Bates Number (if applicable)	Docu ment Type	Privilege Tags	Privilege Note	Sent Date	Subject	From	To	CC
2	AHCA0003348	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	1/5/2022 4:28 PM	Sending to you for future reference and to obtain latest version for you.	Bunton, Samuel	""Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
3	AHCA0003349	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	1/5/2022 4:34 PM	FW: Sending to you for future reference and to obtain latest version for you.	Bunton, Samuel	""Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
4	AHCA0003350- AHCA0003460	Pdf	Work-Product	Attachment to email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria; Decision	12/31/9999 7:00 PM				
5	AHCA0003461	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	1/5/2022 4:34 PM	FW: Sending to you for future reference and to obtain latest version for you.	Bunton, Samuel	""Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
6	AHCA0003462- AHCA0003572	Pdf	Work-Product	Attachment to email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria; Decision	12/31/9999 7:00 PM				
7	AHCA0073790	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	3/21/2022 6:52 PM	Gender Dysphoria Discrimination - The ADA Project	Josie	Josie Tamayo	
8	AHCA0075195	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria and ADA Project.	3/22/2022 12:17 PM	FW: Gender Dysphoria Discrimination - The ADA Project	Tamayo, Josefina	""Sheeran"" , "" Andrew;" "Kellum"" , "" Kim;" "Bunton"" , "" Samuel;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
9	AHCA0075196	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	3/22/2022 3:15 PM	FW: Gender Dysphoria Discrimination - The ADA Project	Bunton, Samuel	""Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
10	AHCA0076567	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	3/25/2022 7:12 AM	FW: Claire v. Florida Department of Management Services, 504 F.Supp.3d 1328, N.D. Florida	Bunton, Samuel	""Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
11	AHCA0076568- AHCA0076575	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	12/31/9999 7:00 PM				
12	AHCA0076576- AHCA0076583	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	12/31/9999 7:00 PM				
13	AHCA0076584	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similiar case.	3/25/2022 7:14 AM	FW: Claire v. Florida Department of Management Services, 504 F.Supp.3d 1328, N.D. Florida	Bunton, Samuel	""Templeton"" , "" Mary Gay;<MaryGay.Templeton@ahca.myflorida.com>	
14	AHCA0076585- AHCA0076592	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	12/31/9999 7:00 PM				
15	AHCA0076593- AHCA0076600	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	12/31/9999 7:00 PM				
16	AHCA0076601	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	3/25/2022 8:20 AM	Cases of interest	Bunton, Samuel	""Templeton"" , "" Mary Gay;<MaryGay.Templeton@ahca.myflorida.com>	
17	AHCA0076602- AHCA0076606	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	12/31/9999 7:00 PM				
18	AHCA0076607- AHCA0076617	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	12/31/9999 7:00 PM				

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19	AHCA0076618-AHCA0076631	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	12/31/9999 7:00 PM				
20	AHCA0077010	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	3/25/2022 11:21 AM	US v FI Confidential	Tamayo, Josefina	Andy Bardos - 2825 (Andy.Bardos@gray-robinson.com)	Sheeran, Andrew
21	AHCA0077011-AHCA0077013	Pdf	Work-Product	Attachment to Email between AHCA General Counsel staff regarding similar case; HHS Notice and Guidance on gender Affirming Care, Civil Rights, and Patient Privacy.	12/31/9999 7:00 PM				
22	AHCA0084244	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	4/4/2022 4:20 PM		Templeton, Mary Gay	""Kellum"" , ""Kim;<Kim.Kellum@ahca.myflorida.com>	
23	AHCA0084245-AHCA0084252	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	12/31/9999 7:00 PM				
24	AHCA0084811	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	4/11/2022 5:27 PM	Expert Declaration	Andy Bardos	""Sheeran"" , ""Andrew;<andrew.sheeran@ahca.myflorida.com>	
25	AHCA0084812-AHCA0084909	Pdf	Work-Product	Attachment to Email between AHCA General Counsel staff regarding similar case; Expert declaration.	12/31/9999 7:00 PM				
26	AHCA0084910-AHCA0084914	Pdf	Work-Product	Attachment to Email between AHCA General Counsel staff regarding similar case; caselaw.	12/31/9999 7:00 PM				
27	AHCA0087361	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	4/18/2022 11:11 AM	FW: Conference with Dr. Cantor	Ashley Hoffman Lukis	""Sheeran"" , ""Andrew;<andrew.sheeran@ahca.myflorida.com>	
28	AHCA0087362-AHCA0087369	Pdf	Work-Product	Attachment to Email between AHCA General Counsel staff regarding similar case; published article by J. Cantor.	12/31/9999 7:00 PM				
29	AHCA0087370-AHCA0087371	Pdf	Work-Product	Email between AHCA General Counsel's office and Assistant Deputy Secretary for Medicaid re: expert publication.	4/18/2022 11:14 AM	FW: Conference with Dr. Cantor	Sheeran, Andrew	""Weida"" , ""Jason;<Jason.Weida@ahca.myflorida.com>	
30	AHCA0087372-AHCA0087379	Pdf	Work-Product	Attachment to email between AHCA General Counsel's office and Assistant Deputy Secretary for Medicaid re: expert publication.	12/31/9999 7:00 PM				
31	AHCA0088021-AHCA0088022	Pdf	Work-Product	Email between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid and expert re: retention of experts and reports.	4/21/2022 6:06 PM	RE: Academic CV [ATTORNEY WORK PRODUCT]	Sheeran, Andrew	Romina Brignardello Petersen	Weida, Jason
32	AHCA0088023-AHCA0088105	Pdf	Work-Product	Attachment to email between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid and expert re: retention of experts and reports.	12/31/9999 7:00 PM				
33	AHCA0098138	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid and expert regarding expert testimony.	4/25/2022 11:53 PM	Re: TIME SENSITIVE Re: Florida Contract [Priv/Conf/Atty WP]	Andre Van Mol	""Weida"" , ""Jason;<Andrew.Sheeran@ahca.myflorida.com>	
34	AHCA0098139-AHCA0098141	Pdf	Work-Product	Attachment to email between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid and expert regarding expert testimony.	12/31/9999 7:00 PM				
35	AHCA0098142-AHCA0098145	Pdf	Work-Product	Attachment to email between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid and expert regarding expert testimony.	12/31/9999 7:00 PM				
36	AHCA0098255	Pdf	Work-Product	Email between AHCA Administrator and Assistant Deputy Secretary for Medicaid regarding retention of expert.	4/27/2022 9:40 AM	Dr. Cantor	Weida, Jason	""Pickle"" , ""Devona;<Devona.Pickle@ahca.myflorida.com>	
37	AHCA0098256-AHCA0098285	Pdf	Work-Product	Attachment to email between AHCA Administrator and Assistant Deputy Secretary for Medicaid regarding retention of expert.	12/31/9999 7:00 PM				

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38	AHCA0101257	Pdf	Attorney-Client;Work-Product	Email between AHCA Office of General Counsel, expert, and Assistant Deputy Secretary for Medicaid regarding draft expert report and analysis.	5/1/2022 2:51 PM	Re: Florida Consulting [Priv/Confi/Atty WP]	Andre Van Mol	Weida Jason	Sheeran, Andrew;Pickle, Devona
39	AHCA0101258-AHCA0101312	Pdf	Attorney-Client;Work-Product	Attachment to email between AHCA Office of General Counsel, expert, and Assistant Deputy Secretary for Medicaid regarding draft expert report	12/31/9999 7:00 PM				
40	AHCA0101313	Pdf	Attorney-Client;Work-Product	Email between AHCA Office of General Counsel, AHCA Program Consultant, and AHCA Administrator regarding draft expert report and	5/2/2022 8:40 AM	FW: Florida Consulting [Priv/Confi/Atty WP]	Pickle, Devona	""Brackett"" , ""Matt;<Matt.Brackett@ahca.myflorida.com>	Sheeran, Andrew
41	AHCA0101314-AHCA0101368	Pdf	Attorney-Client;Work-Product	Attachment to email between AHCA Office of General Counsel, AHCA Program Consultant, and AHCA Administrator regarding draft expert report and analysis.	12/31/9999 7:00 PM				
42	AHCA0101369	Pdf	Attorney-Client;Work-Product	Email between AHCA Office of General Counsel, expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft expert report and analysis.	5/2/2022 8:57 AM	RE: Florida Consulting [Priv/Confi/Atty WP]	Weida, Jason	Andre Van Mol	Sheeran, Andrew;Pickle, Devona
43	AHCA0101370	Pdf	Attorney-Client;Work-Product	Email between AHCA Office of General Counsel, expert, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert report and analysis.	5/2/2022 8:58 AM	FW: Florida Consulting [Priv/Confi/Atty WP]	Weida, Jason	""Pickle"" , "" Devona;" "Brackett"" , ""Matt;" "Chen"" , ""Nai;<Matt.Brackett@ahca.myflorida.com>;<Devona.Pickle@ahca.myflorida.com>;<Nai.Chen@ahca.myflorida.com>	
44	AHCA0101371-AHCA0101425	Pdf	Attorney-Client;Work-Product	Attachment to email between AHCA Office of General Counsel, expert, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert report and analysis.	12/31/9999 7:00 PM				
45	AHCA0102874	Pdf	Attorney-Client;Work-Product	Email between expert and AHCA Office of General Counsel, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and analysis.	5/5/2022 12:22 PM	Evidence evaluation draft reports	Romina Brignardello Petersen	""Weida"" , ""Jason;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Devona.Pickle@ahca.myflorida.com>	Pickle, Devona;Sheeran, Andrew
46	AHCA0102875-AHCA0102879	Pdf	Attorney-Client;Work-Product	Attachment to email between expert and AHCA Office of General Counsel, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and analysis.	12/31/9999 7:00 PM				
47	AHCA0102880-AHCA0102884	Pdf	Attorney-Client;Work-Product	Attachment to email between expert and AHCA Office of General Counsel, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and analysis.	12/31/9999 7:00 PM				
48	AHCA0102885-AHCA0102892	Pdf	Attorney-Client;Work-Product	Attachment to email between expert and AHCA Office of General Counsel, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and analysis.	12/31/9999 7:00 PM				
49	AHCA0102893-AHCA0102928	Pdf	Attorney-Client;Work-Product	Attachment to email between expert and AHCA Office of General Counsel, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and analysis.	12/31/9999 7:00 PM				
50	AHCA0102929-AHCA0102930	Pdf	Attorney-Client;Work-Product	Attachment to email between expert and AHCA Office of General Counsel, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and analysis.	12/31/9999 7:00 PM				

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51	AHCA0102931	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Office of General Counsel, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and analysis.	5/5/2022 1:20 PM	Fwd: Evidence evaluation draft reports	Weida, Jason	""Pickle""; "" Devona;" "Brackett""; "" Matt;" "Chen""; "" Nai;<Matt.Brackett@ahca.myflorida.com >;<Devona.Pickle@ahca.myflorida.com>;<Nai.Chen@ahca.myflorida.com>	Sheeran,
52	AHCA0102932- AHCA0102936	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Office of General Counsel, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and	12/31/9999 7:00 PM				
53	AHCA0102937- AHCA0102941	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Office of General Counsel, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and	12/31/9999 7:00 PM				
54	AHCA0102942- AHCA0102949	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Office of General Counsel, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and	12/31/9999 7:00 PM				
55	AHCA0102950- AHCA0102985	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Office of General Counsel, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and	12/31/9999 7:00 PM				
56	AHCA0102986- AHCA0102987	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Office of General Counsel, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert memo report and	12/31/9999 7:00 PM				
57	AHCA0112129	Pdf	Work-Product	Email exchange between expert and Assistant Deputy Secretary for Medicaid regarding feedback on draft expert declaration.	5/9/2022 9:19 PM	my draft declaration	QUENTIN VAN METER	<Jason.Weida@ahca.myflorida.com>;<jason.weida@ahca.myflorida.com>	
58	AHCA0112130- AHCA0112144	Pdf	Work-Product	Attachment to email exchange between expert and Assistant Deputy Secretary for Medicaid regarding feedback on draft expert declaration.	12/31/9999 7:00 PM				
59	AHCA0117542	Pdf	Attorney-Client;Work-Product	Email exchange between expert, AHCA General Counsel's Office, and Assistant Deputy Secretary for Medicaid regarding draft expert consultation.	5/10/2022 4:00 PM	Florida Medicaid Project	G Kevin Donovan	""Weida""; "" Jason;<Andrew.Sheeran@ahca.myflorida.com>	Sheeran, Andrew
60	AHCA0117543- AHCA0117554	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, and Assistant Deputy Secretary for Medicaid regarding draft expert consultation.	12/31/9999 7:00 PM				
61	AHCA0117555	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert consultation.	5/10/2022 4:29 PM	Fwd: Florida Medicaid Project	Weida, Jason	""Pickle""; "" Devona;" "Brackett""; "" Matt;" "Chen""; "" Nai;<Matt.Brackett@ahca.myflorida.com >;<Devona.Pickle@ahca.myflorida.com>;<Nai.Chen@ahca.myflorida.com>	Sheeran, Andrew
62	AHCA0117556- AHCA0117567	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert consultation.	12/31/9999 7:00 PM				

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63	AHCA0119114	Pdf	Attorney-Client;Work-Product	Email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft revised expert consultation.	5/12/2022 5:31 PM	Florida Medicaid Project	G Kevin Donovan	""Weida"" , "" Jason;<Devona.Pickle@ahca.myflorida.com>	Pickle, Devona;Sheeran, Andrew
64	AHCA0119115- AHCA0119128	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft revised expert consultation.	12/31/9999 7:00 PM				
65	AHCA0119138	Pdf	Attorney-Client;Work-Product	Email from AHCA Administrator to AHCA Program Consultant and AHCA Senior Pharmacist regarding review of draft expert consultation.	5/13/2022 7:49 AM	Fwd: Florida Medicaid Project	Pickle, Devona	""Brackett"" , "" Matt;" "Chen"" , "" Nai;<Matt.Brackett@ahca.myflorida.com> ;<Nai.Chen@ahca.myflorida.com>	
66	AHCA0119139- AHCA0119152	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Administrator to AHCA Program Consultant and AHCA Senior Pharmacist regarding review of draft expert consultation.	12/31/9999 7:00 PM				
67	AHCA0119169	Pdf	Work-Product	Email exchange between AHCA Administrator and AHCA Program Consultant regarding draft expert consultation report.	5/13/2022 11:56 AM		Brackett, Matt	""Pickle"" , "" Devona;<Devona.Pickle@ahca.myflorida.com>	
68	AHCA0119170- AHCA0119177	Pdf	Work-Product	Attachment to email exchange between AHCA Administrator and AHCA Program Consultant regarding draft expert consultation report.	12/31/9999 7:00 PM				
69	AHCA0119179	Pdf	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft corrections to expert report.	5/13/2022 12:34 PM	Corrections to Draft	Andre Van Mol	Weida Jason;<Matt.Brackett@ahca.myflorida.com> ;<Devona.Pickle@ahca.myflorida.com>	
70	AHCA0119180- AHCA0119186	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft corrections to expert report.	12/31/9999 7:00 PM				
71	AHCA0119187- AHCA0119241	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding draft corrections to expert report.	12/31/9999 7:00 PM				
72	AHCA0119266	Pdf	Work-Product	Email from AHCA Administrator to AHCA Senior Pharmacist regarding draft corrections to expert report.	5/13/2022 3:50 PM	FW: Corrections to Draft	Pickle, Devona	""Chen"" , "" Nai;<Nai.Chen@ahca.myflorida.com>	
73	AHCA0119267- AHCA0119273	Pdf	Work-Product	Attachment to email from AHCA Administrator to AHCA Senior Pharmacist regarding draft corrections to expert report.	12/31/9999 7:00 PM				
74	AHCA0119274- AHCA0119328	Pdf	Work-Product	Attachment to email from AHCA Administrator to AHCA Senior Pharmacist regarding draft corrections to expert report.	12/31/9999 7:00 PM				
75	AHCA0119331	Pdf	Work-Product	Email exchange between expert and Assistant Deputy Secretary for Medicaid re: initial draft expert report.	5/13/2022 10:18 PM	Lappert Expert Report Initial Draft	patrick Lappert	""Jason Weida"" , "" JD;<jason.weida@ahca.myflorida.com>	
76	AHCA0119332- AHCA0119351	Pdf	Work-Product	Attachment to email exchange between expert and Assistant Deputy Secretary for Medicaid re: initial draft expert report.	12/31/9999 7:00 PM				
77	AHCA0119352	Pdf	Work-Product	Email exchange between expert and Assistant Deputy Secretary for Medicaid re: draft revised declaration.	5/14/2022 11:17 AM	new draft version of statement by Van Meter	QUENTIN VAN METER	<jason.weida@ahca.myflorida.com>	
78	AHCA0119353- AHCA0119370	Pdf	Work-Product	Attachment to email exchange between expert and Assistant Deputy Secretary for Medicaid re: draft revised declaration.	12/31/9999 7:00 PM				

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79	AHCA0119390- AHCA0119392	Pdf	Attorney- Client;Work- Product	Email communications between expert witness and AHCA staff concerning expert report.	5/16/2022 1:44 PM	Re: Florida	Dr. James Cantor	""Weida"" , "" Jason;<Devona.Pickle@ahca.myflorida.com>	Pickle, Devona;Ashley Hoffman Lukis
80	AHCA0119393- AHCA0119452	Pdf	Work-Product	Attachment to email communications between expert witness and AHCA staff concerning expert report; expert report.	12/31/9999 7:00 PM				
81	AHCA0119453- AHCA0119484	Pdf	Work-Product	Attachment to email communications between expert witness and AHCA staff concerning expert report; expert CV.	12/31/9999 7:00 PM				
82	AHCA0119485	Pdf	Work-Product	Attachment to email communications between expert witness and AHCA staff concerning expert report; expert notes on prospective outcomes.	12/31/9999 7:00 PM				
83	AHCA0119496- AHCA0119508	Pdf	Attorney- Client;Work- Product	Email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert report.	5/16/2022 2:09 PM	FW: Florida	Weida, Jason	""Pickle"" , "" Devona;" "Brackett"" , "" Matt;" "Chen"" , "" Nai;<Matt.Brackett@ahca.myflorida.com>;<Devona.Pickle@ahca.myflorida.com>;<Nai.Chen@ahca.myflorida.com>	Sheeran, Andrew
84	AHCA0119509- AHCA0119568	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert report.	12/31/9999 7:00 PM				
85	AHCA0119569- AHCA0119600	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert report.	12/31/9999 7:00 PM				
86	AHCA0119601	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding draft expert report.	12/31/9999 7:00 PM				
87	AHCA0119617	Pdf	Work-Product	Email from AHCA Administrator to expert re: revisions to draft expert report.	5/16/2022 6:01 PM	Florida Medicaid Project Final Draft	Pickle, Devona	<g.kevin.donovan@georgetown.edu>	Weida, Jason
88	AHCA0119618- AHCA0119626	Pdf	Work-Product	Attachment to email from AHCA Administrator to expert re: revisions to draft expert report.	12/31/9999 7:00 PM				
89	AHCA0119627- AHCA0119635	Pdf	Work-Product	Attachment to email from AHCA Administrator to expert re: revisions to draft expert report.	12/31/9999 7:00 PM				
90	AHCA0119636- AHCA0119637	Pdf	Work-Product	Email from expert to Assistant Deputy Secretary for Medicaid re: revisions to draft expert declaration.	5/16/2022 9:34 PM	RE: new draft version of statement by Van Meter	QUENTIN VAN METER	""Weida"" , "" Jason;<jason.weida@ahca.myflorida.com>	
91	AHCA0119638- AHCA0119656	Pdf	Work-Product	Attachment to email from expert to Assistant Deputy Secretary for Medicaid re: revisions to draft expert declaration.	12/31/9999 7:00 PM				
92	AHCA0119657- AHCA0119659	Pdf	Attorney- Client;Work- Product	Email from Assistant Deputy Secretary for Medicaid to AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist regarding draft expert declaration.	5/16/2022 10:34 PM	Fwd: new draft version of statement by Van Meter	Weida, Jason	""Pickle"" , "" Devona;" "Brackett"" , "" Matt;" "Chen"" , "" Nai;<Matt.Brackett@ahca.myflorida.com>;<Devona.Pickle@ahca.myflorida.com>;<Nai.Chen@ahca.myflorida.com>	
93	AHCA0119660- AHCA0119678	Pdf	Work-Product	Attachment to email from Assistant Deputy Secretary for Medicaid to AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist regarding draft expert declaration.	12/31/9999 7:00 PM				

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94	AHCA0119679	Pdf	Attorney-Client;Work-Product	Email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	5/16/2022 10:58 PM	Evidence evaluation final reports	Romina Brignardello Petersen	""Weida"";"" Jason;"" Pickle"";"" Devona;"" Sheeran"";"" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
95	AHCA0119680- AHCA0119684	Pdf	Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
96	AHCA0119685- AHCA0119691	Pdf	Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
97	AHCA0119692- AHCA0119699	Pdf	Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
98	AHCA0119700- AHCA0119704	Pdf	Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
99	AHCA0119705- AHCA0119746	Pdf	Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
100	AHCA0119747- AHCA0119748	Pdf	Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
101	AHCA0119749- AHCA0119750	Pdf	Work-Product	Attachment to email exchange between expert, AHCA General Counsel's Office, AHCA Administrator, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
102	AHCA0119751	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	5/16/2022 11:17 PM	Fwd: Evidence evaluation final reports	Weida, Jason	""Pickle"";"" Devona;"" Brackett"";"" Matt;"" Chen"";"" Nai;<Matt.Brackett@ahca.myflorida.com>;<Devona.Pickle@ahca.myflorida.com>;<Nai.Chen@ahca.myflorida.com>	Sheeran,
103	AHCA0119752- AHCA0119756	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
104	AHCA0119757- AHCA0119763	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
105	AHCA0119764- AHCA0119771	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				

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106	AHCA0119772- AHCA0119776	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
107	AHCA0119777- AHCA0119818	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
108	AHCA0119819- AHCA0119820	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
109	AHCA0119821- AHCA0119822	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding expert reports.	12/31/9999 7:00 PM				
110	AHCA0119823	Pdf	Work-Product	Email from expert to Assistant Deputy Secretary for Medicaid regarding review of initial draft of expert report.	5/16/2022 11:24 PM	Fwd: Lappert Expert Report Initial Draft	patrick Lappert	""Jason Weida"" , "" JD;<jason.weida@ahca.myflorida.com>	
111	AHCA0119824- AHCA0119843	Pdf	Work-Product	Attachment to email from expert to Assistant Deputy Secretary for Medicaid regarding review of initial draft of expert report.	12/31/9999 7:00 PM				
112	AHCA0119844	Pdf	Attorney- Client;Work- Product	Email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding initial draft of expert report.	5/16/2022 11:26 PM	Fwd: Lappert Expert Report Initial Draft	Weida, Jason	""Pickle"" , "" Devona;" "Brackett"" , "" Matt;" "Chen"" , "" Nai;<Matt.Brockett@ahca.myflorida.com >;<Devona.Pickle@ahca.myflorida.com> >;<Nai.Chen@ahca.myflorida.com>	Sheeran,
113	AHCA0119845- AHCA0119864	Pdf	Work-Product	Attachment to email exchange between AHCA General Counsel's Office, AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid regarding initial draft of expert report.	12/31/9999 7:00 PM				
114	AHCA0122223	Pdf	Work-Product	Email exchange between AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist regarding expert report.	5/17/2022 11:05 AM	Donovan Final	Pickle, Devona	""Brackett"" , "" Matt;" "Chen"" , "" Nai;<Matt.Brockett@ahca.myflorida.com >;<Nai.Chen@ahca.myflorida.com>	
115	AHCA0122224- AHCA0122232	Pdf	Work-Product	Attachment to email exchange between AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist regarding expert report.	12/31/9999 7:00 PM				
116	AHCA0122233- AHCA0122254	Pdf	Work-Product	Email exchange between expert and Assistant Deputy Secretary for Medicaid re: revised expert report.	5/17/2022 11:31 AM	Re: Florida	Dr. James Cantor	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.co m>	
117	AHCA0122255- AHCA0122315	Pdf	Work-Product	Attachment to email exchange between expert and Assistant Deputy Secretary for Medicaid re: revised expert report.	12/31/9999 7:00 PM				
118	AHCA0122318- AHCA0122339	Pdf	Attorney- Client;Work- Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid, General Counsel's Office, AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist re: revised expert report.	5/17/2022 11:48 AM	Fwd: Florida	Weida, Jason	""Pickle"" , "" Devona;" "Brackett"" , "" Matt;" "Chen"" , "" Nai;<Matt.Brockett@ahca.myflorida.com >;<Devona.Pickle@ahca.myflorida.com> >;<Nai.Chen@ahca.myflorida.com>	Sheeran, Andrew

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119	AHCA0122340- AHCA0122400	Pdf	Work-Product	Attachment to email exchange between AHCA Assistant Deputy Secretary for Medicaid, General Counsel's Office, AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist re: revised expert report.	12/31/9999 7:00 PM				
120	AHCA0122403	Pdf	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	5/17/2022 3:27 PM	Florida Medicaid Project Final Draft	Pickle, Devona	<kidendo@comcast.net>	Weida, Jason
121	AHCA0122404- AHCA0122416	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	12/31/9999 7:00 PM				
122	AHCA0122417- AHCA0122430	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	12/31/9999 7:00 PM				
123	AHCA0122431	Pdf	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	5/17/2022 3:31 PM	Florida Medicaid Project Final Draft	Pickle, Devona	<patrick@lappertplasticsurgery.com>	Weida, Jason
124	AHCA0122432- AHCA0122446	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	12/31/9999 7:00 PM				
125	AHCA0122447- AHCA0122462	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	12/31/9999 7:00 PM				
126	AHCA0122463	Pdf	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	5/17/2022 3:31 PM	Delivered: Florida Medicaid Project Final Draft	Microsoft Outlook	<Devona.Pickle@ahca.myflorida.com>	
127	AHCA0122464	Email	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	5/17/2022 3:31 PM	Florida Medicaid Project Final Draft	Pickle, Devona	<patrick@lappertplasticsurgery.com>	Weida, Jason
128	AHCA0122465	Pdf	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to expert report.	12/31/9999 7:00 PM				
129	AHCA0122466	Pdf	Work-Product	Email exchange between AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist re: revised expert report.	5/17/2022 4:00 PM	Final Report	Pickle, Devona	""Brackett"" "" Matt," "Chen"" "" Nai;<Matt.Brackett@ahca.myflorida.com >;<Nai.Chen@ahca.myflorida.com>	
130	AHCA0122467- AHCA0122481	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator, AHCA Program Consultant, and AHCA Senior Pharmacist re: revised expert	12/31/9999 7:00 PM				
131	AHCA0122488	Pdf	Work-Product	Email exchange between AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid re: revised expert report.	5/17/2022 5:49 PM	VanMeter_Report_FINAL_051722.docx	Pickle, Devona	""Chen"" "" Nai;<Nai.Chen@ahca.myflorida.com>	Brackett, Matt;Weida, Jason
132	AHCA0122489- AHCA0122501	Pdf	Work-Product	Attachment to email exchange between AHCA Administrator, AHCA Program Consultant, AHCA Senior Pharmacist, and Assistant Deputy Secretary for Medicaid re: revised expert report.	12/31/9999 7:00 PM				
133	AHCA0122502	Pdf	Work-Product	Email exchange between expert, AHCA Administrator and Assistant Deputy Secretary for Medicaid re: revisions to draft expert report.	5/17/2022 5:50 PM	RE: Florida Medicaid Project Final Draft	Pickle, Devona	QUENTIN VAN METER	Weida, Jason
134	AHCA0122503- AHCA0122515	Pdf	Work-Product	Attachment to email exchange between expert, AHCA Administrator and Assistant Deputy Secretary for Medicaid re: revisions to draft expert report.	12/31/9999 7:00 PM				
135	AHCA0122516- AHCA0122531	Pdf	Work-Product	Email exchange between AHCA Administrator and AHCA Senior Pharmacist re: expert reports.	5/17/2022 7:01 PM	FW: Florida	Pickle, Devona	""Chen"" "" Nai;<Nai.Chen@ahca.myflorida.com>	

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136	AHCA0122532	Pdf	Work-Product	Attachment to email exchange between AHCA Administrator and AHCA Senior Pharmacist re: expert reports.	12/31/9999 7:00 PM				
137	AHCA0126286	Pdf	Work-Product	Email from expert to AHCA Program Consultant re: expert report revisions.	5/18/2022 12:15 PM	Should you need	Andre Van Mol	Brackett Matt	
138	AHCA0126287	Pdf	Work-Product	Attachment to email from expert to AHCA Program Consultant re: expert report revisions.	12/31/9999 7:00 PM				
139	AHCA0128582	Pdf	Work-Product	Email from expert to AHCA Assistant Deputy Secretary for Medicaid re: itemized charges for consulting.	5/21/2022 1:11 PM	Charges	Andre Van Mol	Weida Jason	
140	AHCA0128583- AHCA0128584	Pdf	Work-Product	Email exchange between expert, AHCA Assistant Deputy Secretary for Medicaid, and AHCA Administrator re: itemized charges for consulting.	5/21/2022 8:19 PM	Fwd: Charges	Weida, Jason	""Pickle"" , "" Devona;<Devona.Pickle@ahca.myflorida.com>	Andre Van Mol
141	AHCA0130855- AHCA0130856	Pdf	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to invoice for consulting.	5/23/2022 4:29 PM	RE: Charges	Pickle, Devona	Andre Van Mol	Weida, Jason
142	AHCA0130857- AHCA0130858	Pdf	Work-Product	Email exchange between expert, AHCA Administrator, and Assistant Deputy Secretary for Medicaid re: revisions to invoice for consulting.	5/23/2022 4:46 PM	Re: Charges	Andre Van Mol	""Pickle"" , "" Devona;<Jason.Weida@ahca.myflorida.com>	Weida, Jason
143	AHCA0130861;Def_000128575	Pdf			5/23/2022 8:41 PM	Invoice	Andre Van Mol	""Pickle"" , "" Devona;<Devona.Pickle@ahca.myflorida.com>	
144	AHCA0130862;Def_000128576	Pdf			12/31/9999 7:00 PM				
145	AHCA0131443;Def_000129157	Pdf		Email exchange between expert, AHCA Administrator, and AHCA Senior Pharmacist re: invoice for evidence evaluation.	5/24/2022 11:47 AM	Invoice for evidence evaluation	Romina Brignardello Petersen	<Nai.Chen@ahca.myflorida.com>;<Devona.Pickle@ahca.myflorida.com>	Pickle, Devona
146	AHCA0131444- AHCA0131445;Def_000129158-	Pdf		Attachment to email exchange between expert, AHCA Administrator, and AHCA Senior Pharmacist re: invoice for evidence evaluation.	12/31/9999 7:00 PM				
147	AHCA0141306- AHCA0141307	Pdf	Attorney-Client;Work-Product	Email from AHCA Program Administrator to Assistant Deputy Secretary for Medicaid, AHCA Chief of Staff, AHCA Bureau Chief, and Office of General Counsel re: revised rule, notice of rule development, and finalizing recommendation regarding the rule.	6/1/2022 1:09 PM	RE: Discussion [Privileged]	Giering, Cole	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	Farrill, Cody;Sheeran, Andrew;Dalton, Ann;Grantham, Shena;Tamayo, Josefina;Kellum, Kim
148	AHCA0141308	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Program Administrator to Assistant Deputy Secretary for Medicaid, AHCA Chief of Staff, AHCA Bureau Chief, and Office of General Counsel re: revised rule, notice of rule development, and finalizing recommendation regarding the rule.	12/31/9999 7:00 PM				
149	AHCA0141309- AHCA0141312	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Program Administrator to Assistant Deputy Secretary for Medicaid, AHCA Chief of Staff, AHCA Bureau Chief, and Office of General Counsel re: revised rule, notice of rule development, and finalizing recommendation regarding the rule.	12/31/9999 7:00 PM				
150	AHCA0141315- AHCA0141316	Pdf	Attorney-Client;Work-Product	Email from AHCA Program Administrator to Assistant Deputy Secretary for Medicaid re: revisions to rule.	6/1/2022 3:15 PM	RE: Discussion [Privileged]	Giering, Cole	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	
151	AHCA0141317- AHCA0141318	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Program Administrator to Assistant Deputy Secretary for Medicaid re: revisions to rule.	12/31/9999 7:00 PM				

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152	AHCA0144360- AHCA0144366	Pdf	Attorney-Client	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 8:24 AM	FW: Public Records Daily Log	George, Tracy	""Kellum""; "" Kim;"" "Grantham""; "" Shena;"" "Sheeran""; "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Shoop,
153	AHCA0144377- AHCA0144383	Pdf	Attorney-Client	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 8:35 AM	RE: Public Records Daily Log	Shoop, Richard	""George""; "" Tracy;<Tracy.George@ahca.myflorida.com>	
154	AHCA0144384- AHCA0144390	Pdf	Attorney-Client	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 8:42 AM	RE: Public Records Daily Log [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Sheeran, Andrew	""George""; "" Tracy;"" "Kellum""; "" Kim;"" "Grantham""; "" Shena;<Kim.Kellum@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
155	AHCA0144404- AHCA0144411	Pdf	Attorney-Client;Work-Product	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 9:28 AM	RE: Public Records Daily Log [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	George, Tracy	""Sheeran""; "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
156	AHCA0147567- AHCA0147571;Def_000145172-	Pdf	Attorney-Client	Attachment to email exchange between counsel in AHCA General Counsel's Office with counsel's legal analysis in anticipation of litigation.	12/31/9999 7:00 PM				
157	AHCA0151614	Pdf	Attorney-Client	Email from AHCA Administrator to AHCA General Counsel's Office; AHCA Bureau Chief, Assistant Deputy Secretary for Medicaid, and AHCA Senior Pharmacist re: legal analysis of governing statutory provision.	6/6/2022 11:35 AM	Follow Up from Friday Gender Dysphoria Meeting	Peterson, Ashley	""Dalton""; "" Ann;"" "Sheeran""; "" Andrew;"" "Kellum""; "" Kim;<Ann.Dalton@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
158	AHCA0151615- AHCA0151616	Pdf	Attorney-Client	Attachment to email from AHCA Administrator to AHCA General Counsel's Office; AHCA Bureau Chief, Assistant Deputy Secretary for Medicaid, and AHCA Senior Pharmacist re: legal analysis of governing statutory provision.	12/31/9999 7:00 PM				
159	AHCA0151617	Pdf	Attorney-Client	Attachment to email from AHCA Administrator to AHCA General Counsel's Office; AHCA Bureau Chief, Assistant Deputy Secretary for Medicaid, and AHCA Senior Pharmacist re: legal analysis of governing statutory provision.	12/31/9999 7:00 PM				
160	AHCA0159399- AHCA0159401	Pdf	Attorney-Client	Email from AHCA General Counsel's Office to Public Records Office re: public records request response.	6/9/2022 3:48 PM	FW: Public Records Request GAPMS Memo & Related Documents	George, Tracy	""Gavins""; "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
161	AHCA0159580	Pdf	Attorney-Client;Work-Product	Email from AHCA Assistant Deputy Secretary for Medicaid to EOG's Office re: discussion of caselaw and legal developments.	6/10/2022 3:47 PM	Privileged & Confidential	Weida, Jason	""Furino""; "" Maureen;<Maureen.Furino@eog.myflorida.com>	
162	AHCA0159581- AHCA0159621	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary for Medicaid to EOG's Office re: discussion of caselaw and legal developments.	12/31/9999 7:00 PM				
163	AHCA0159622- AHCA0159639	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary for Medicaid to EOG's Office re: discussion of caselaw and legal developments.	12/31/9999 7:00 PM				
164	AHCA0159640- AHCA0159671	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary for Medicaid to EOG's Office re: discussion of caselaw and legal developments.	12/31/9999 7:00 PM				
165	AHCA0160500	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office to Assistant Deputy Secretary for Medicaid re: legal developments.	6/13/2022 8:43 AM	Lange v. Houston County	Sheeran, Andrew	""Weida""; "" Jason;<Jason.Weida@ahca.myflorida.com>	
166	AHCA0160501- AHCA0160533	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office to Assistant Deputy Secretary for Medicaid re: legal developments.	12/31/9999 7:00 PM				

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167	AHCA0160534	Pdf	Attorney-Client;Work-Product	Email from AHCA Assistant Deputy Secretary to EOG re: discussion of legal developments.	6/13/2022 8:53 AM	Georgia Case	Weida, Jason	""Furino"" , ""Maureen;<Maureen.Furino@eog.myflorida.com>	
168	AHCA0160535-AHCA0160567	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary to EOG re: discussion of legal developments.	12/31/9999 7:00 PM				
169	AHCA0162930	Pdf	Attorney-Client;Work-Product	Email between General Counsel's office staff regarding filing of complaint.	6/13/2022 1:20 PM	claire_v_florida_complaint.pdf	Christopher Lunny	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
170	AHCA0162931-AHCA0162983	Pdf	Attorney-Client;Work-Product	Attachment to Email between General Counsel's office staff regarding filing of complaint; complaint.	12/31/9999 7:00 PM				
171	AHCA0162984	Pdf	Attorney-Client;Work-Product	Email between General Counsel's office staff regarding filing of complaint.	6/13/2022 1:22 PM	Keohane v Jones.rtf	Christopher Lunny	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
172	AHCA0162985-AHCA0163008	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's office staff regarding filing of complaint; caselaw research.	12/31/9999 7:00 PM				
173	AHCA0163009	Pdf	Attorney-Client;Work-Product	Email from Assistant Deputy Secretary for Medicaid to EOG regarding amicus brief.	6/13/2022 3:45 PM		Weida, Jason	""Furino"" , ""Maureen;<Maureen.Furino@eog.myflorida.com>	
174	AHCA0163010-AHCA0163034	Pdf	Attorney-Client;Work-Product	Attachment to email from Assistant Deputy Secretary for Medicaid to EOG regarding amicus brief.	12/31/9999 7:00 PM				
175	AHCA0163039	Pdf	Work-Product	Email between General Counsel and staff regarding Effects of gender affirming therapies in people with gender dysphoria: evaluation of the best available evidence; Romina Brignardello-Petersen.	6/13/2022 5:25 PM	Searchable version	Chen, Nai	""Pickle"" , "" Devona;" "Brackett"" , ""Matt;<Matt.Brackett@ahca.myflorida.com>;<Devona.Pickle@ahca.myflorida.com>	
176	AHCA0163040-AHCA0163111	Pdf	Work-Product	Attachment to Email between General Counsel and staff regarding Effects of gender affirming therapies in people with gender dysphoria: evaluation of the best available evidence; Romina Brignardello-	12/31/9999 7:00 PM				
177	AHCA0163217	Pdf	Attorney-Client;Work-Product	Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
178	AHCA0163218-AHCA0163258	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation; pleadings.	12/31/9999 7:00 PM				
179	AHCA0163259-AHCA0163276	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation; pleadings.	12/31/9999 7:00 PM				
180	AHCA0163277-AHCA0163308	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation; pleadings.	12/31/9999 7:00 PM				
181	AHCA0163309	Pdf	Attorney-Client;Work-Product	Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Georgia Case	Weida, Jason	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
182	AHCA0163310-AHCA0163342	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
183	AHCA0163343	Pdf	Attorney-Client;Work-Product	Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM		Jason Weida	<jason.weida@ahca.myflorida.com>	
184	AHCA0163344-AHCA0163366	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				

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185	AHCA0163367	Pdf	Attorney-Client;Work-Product	Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
186	AHCA0163368-AHCA0163390	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
187	AHCA0164568	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office regarding similar litigation.	6/14/2022 11:34 AM	ATTORNEY WORK PRODUCT	Sheeran, Andrew	""Kellum"" , ""Kim;<Kim.Kellum@ahca.myflorida.com>	
188	AHCA0164569	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	Sheeran, Andrew	
189	AHCA0164570-AHCA0164610	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
190	AHCA0164611-AHCA0164628	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
191	AHCA0164629-AHCA0164660	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
192	AHCA0164661	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Georgia Case	Weida, Jason	Sheeran, Andrew	
193	AHCA0164662-AHCA0164694	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
194	AHCA0164695	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: WV	Weida, Jason	Sheeran, Andrew	
195	AHCA0164696-AHCA0164740	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
196	AHCA0164741-AHCA0164772	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
197	AHCA0164773	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	Sheeran, Andrew	
198	AHCA0164774-AHCA0164796	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
199	AHCA0164797	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office staff regarding similar litigation.	6/14/2022 1:23 PM	FW: ATTORNEY WORK PRODUCT	Kellum, Kim	""Grantham"" , ""Shena;<Shena.Grantham@ahca.myflorida.com>	
200	AHCA0164798	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	Sheeran, Andrew	
201	AHCA0164799-AHCA0164839	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
202	AHCA0164840-AHCA0164857	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
203	AHCA0164858-AHCA0164889	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				

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204	AHCA0164890	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Georgia Case	Weida, Jason	Sheeran, Andrew	
205	AHCA0164891- AHCA0164923	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
206	AHCA0164924	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: WV	Weida, Jason	Sheeran, Andrew	
207	AHCA0164925- AHCA0164969	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
208	AHCA0164970- AHCA0165001	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
209	AHCA0165002	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	Sheeran, Andrew	
210	AHCA0165003- AHCA0165025	Pdf	Attorney-Client;Work-Product	Attachment to Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	12/31/9999 7:00 PM				
211	AHCA0165028- AHCA0165029	Pdf	Attorney-Client;Work-Product	Email between General Counsel and General Counsel staff regarding caselaw research.	6/14/2022 5:19 PM	RE: Cases	Sheeran, Andrew	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
212	AHCA0165037- AHCA0165043;Def_000289208-	Pdf	Attorney-Client;Work-Product	Attachment to email regarding status updates of public records and media requests; request tracker.	12/31/9999 7:00 PM				
213	AHCA0178543	Pdf	Work-Product	Email between EOG General Counsel's Office and AHCA General Counsel relating to similar litigation.	6/28/2022 7:28 PM	FW: Doe v. Snyder	Furino, Maureen	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	Sheeran, Andrew
214	AHCA0178544- AHCA0178557	Pdf	Work-Product	Attachment to Email between EOG General Counsel's Office and AHCA General Counsel relating to similar litigation.	12/31/9999 7:00 PM				
215	AHCA0178580- AHCA0178581	Pdf	Work-Product	Email between AHCA General Counsel and outside counsel relating to similar litigation.	6/29/2022 5:28 AM	Fwd: Doe v. Snyder	Tamayo, Josefina	Mohammad O. Jazil;"" Weida"" , ""Jason;"" Sheeran"" , "" Andrew;"" Grantham"" , ""Shena;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	
216	AHCA0178582- AHCA0178595	Pdf	Work-Product	Attachment to Email between AHCA General Counsel and outside counsel relating to similar litigation.	12/31/9999 7:00 PM				
217	AHCA0178915- AHCA0178917	Pdf	Work-Product	Email between General Counsel, Chief of Staff, and consultant regarding GAPMS Report.	6/29/2022 3:40 PM	RE: Followup thoughts	Weida, Jason	Ema Syrulnik	Sheeran, Andrew
218	AHCA0178918- AHCA0179116	Pdf	Work-Product	Attachment to Email between General Counsel, Chief of Staff, and consultant regarding GAPMS	12/31/9999 7:00 PM				
219	AHCA0180494	Pdf	Work-Product	Email between General Counsel's Office, staff, and outside counsel regarding responses.	7/1/2022 1:51 PM	ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT	Sheeran, Andrew	Mohammad O. Jazil;Gary V. Perko;"" Kellum"" , "" Kim;"" Grantham"" , ""Shena;"" Tamayo"" , "" Josefina;"" Weida"" , "" Jason;"" Brackett"" , "" Matt	
220	AHCA0181336	Pdf	Work-Product	Email between outside counsel and General Counsel's Office regarding draft script.	7/4/2022 9:25 AM	Attorney Client Privileged & Confidential / Attorney Work Product / July 8th Hearing	Mohammad O. Jazil	""Tamayo"" , "" Josefina;"" Weida"" , "" Jason;"" Sheeran"" , "" Andrew;"" Grantham"" , "" Shena	
221	AHCA0181337- AHCA0181340	Pdf	Work-Product	Draft remarks/script.	12/31/9999 7:00 PM				

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222	AHCA0181345	Pdf	Work-Product	Email between General Counsel and outside counsel regarding draft script.	7/4/2022 10:57 AM	Rule hearing edits (confidential)	Tamayo, Josefina	<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>; "Weida", "Jason," "Sheeran", "Andrew," Grantham", "Shena,"Kellum", "Kim," "Giering", "Cole	
223	AHCA0181346- AHCA0181350	Pdf	Work-Product	Draft remarks/script.	12/31/9999 7:00 PM				
224	AHCA0181390	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 9:53 AM	RE: Rule hearing edits (confidential)	Weida, Jason	"Tamayo", "Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>; "Sheeran", "Andrew," Grantham", "Shena,"Kellum", "Kim," "Giering", "Cole	Zack
225	AHCA0181391- AHCA0181395	Pdf	Work-Product	Draft remarks/script.	12/31/9999 7:00 PM				
226	AHCA0181397	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 10:50 AM	RE: Rule document	Grantham, Shena	"Tamayo", "Josefina," "Kellum", "Kim," "Sheeran", "Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
227	AHCA0181398- AHCA0181402	Pdf	Work-Product	Draft remarks/script.	12/31/9999 7:00 PM				
228	AHCA0181404	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 11:08 AM	Edits	Tamayo, Josefina	"Grantham", "Shena," "Sheeran", "Andrew," "Kellum", "Kim;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	
229	AHCA0181405- AHCA0181409	Pdf	Work-Product	Draft remarks/script for hearing.	12/31/9999 7:00 PM				
230	AHCA0181411	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 11:14 AM	RE: Edits	Grantham, Shena	"Tamayo", "Josefina;<Josefina.Tamayo@ahca.myflorida.com>	Sheeran, Andrew;Kellum, Kim
231	AHCA0181412- AHCA0181416	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
232	AHCA0181423	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 11:14 AM	RE: Edits	Grantham, Shena	Tamayo, Josefina	Sheeran, Andrew;Kellum, Kim
233	AHCA0181424- AHCA0181428	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
234	AHCA0181431	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 2:05 PM	RE: Rule Document (Confidential)	Mohammad O. Jazil	"Tamayo", "Josefina;Gary V. Perko;Zack Bennington," "Grantham", "Shena," "Sheeran", "Andrew," Weida", "Jason,"Kellum", "Kim," "Giering", "Cole	
235	AHCA0181432- AHCA0181441	Pdf	Work-Product	Attachment to email, notes on quality of evidence and discrimination questions and answers.	12/31/9999 7:00 PM				
236	AHCA0181456	Pdf	Work-Product	Email between counsel regarding edits Quality of Evidence Discrimination QA.	7/5/2022 3:39 PM	Quality of Evidence Discrimination QA / Attorney Work Product / Confidential	Mohammad O. Jazil	Michael Beato;" "Sheeran", "Andrew;Gary V. Perko;" "Tamayo", "Josefina;" "Weida", "Jason;<Jason.Weida@ahca.myflorida.com>	
237	AHCA0181457- AHCA0181467	Pdf	Work-Product	Attachment to email, notes and redlines on Quality of Evidence and Discrimination QA.	12/31/9999 7:00 PM				

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238	AHCA0181468	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 3:50 PM	Edits to the Meeting	Grantham, Shena	Tamayo, Josefina; Templeton, Mary Gay; Sheeran, Andrew; Kellum, Kim; Brackett, " Matt; Weida, " " Jason; " "Kellum", "	
239	AHCA0181469- AHCA0181473	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
240	AHCA0181477- AHCA0181478	Pdf	Attorney-Client; Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 4:27 PM	FW: AHCA Listed on Website to Cast Votes for Gender Dysphoria [Privileged & Confidential]	Weida, Jason	"Juarez", " Brock; " Tamayo", " Josefina; <Brock.Juarez@ahca.myflorida.com>; <Josefina.Tamayo@ahca.myflorida.com>	
241	AHCA0181482	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 5:46 PM	FW: Edits to the Meeting	Tamayo, Josefina	<mjazil@holtzmanvogel.com>; <gperko@holtzmanvogel.com>; " Sheeran", " Andrew; " Grantham", " Shena; " Giering", " Cole; " Brackett", " Matt; " Weida", " Jason; " Kellum", " Kim	
242	AHCA0181483- AHCA0181487	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
243	AHCA0181495	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 7:27 PM	FW: Edits to the Meeting	Tamayo, Josefina	Mohammad O. Jazil; Gary Perko; " Sheeran", " Andrew; " Grantham", " Shena; " Giering", " Cole; " Brackett", " Matt; Weida", " Jason; " Kellum", " Kim	
244	AHCA0181496- AHCA0181500	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
245	AHCA0181525	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/6/2022 8:40 AM	FW: Edits to the Meeting	Giering, Cole	"Grantham", " Shena; <Shena.Grantham@ahca.myflorida.com>	
246	AHCA0181526- AHCA0181530	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
247	AHCA0181531	Pdf	Attorney-Client; Work-Product	Email between counsel regarding edits to hearing script.	7/6/2022 8:46 AM	RE: Edits to the Meeting	Grantham, Shena	"Giering", " Cole; " Tamayo", " Josefina; Mohammad O. Jazil; Gary V. Perko; " Sheeran", " Andrew; " Mattson; " John; " Kellum", " Kim; " Weida", " Jason	
248	AHCA0181532- AHCA0181536	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
249	AHCA0181594- AHCA0181595	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/7/2022 10:51 AM	RE: Edits to the Meeting	Giering, Cole	"Grantham", " Shena; <Shena.Grantham@ahca.myflorida.com>	
250	AHCA0181596- AHCA0181600	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
251	AHCA0181627	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/7/2022 12:35 PM	CONFIDENTIAL WORK PRODUCT: Draft Script Revised	Grantham, Shena	Mohammad O. Jazil; Gary V. Perko; " Sheeran", " Andrew; " Tamayo", " Josefina; " Giering", " Cole;	
252	AHCA0181628- AHCA0181632	Pdf	Work-Product	Draft remarks and script for hearing.	12/31/9999 7:00 PM				
253	AHCA0181744- AHCA0181745	Pdf	Attorney-Client; Work-Product	Email between counsel regarding comment letter on AAP Florida Chapter white paper.	7/7/2022 5:23 PM	FW: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	<mjazil@holtzmanvogel.com>; <gperko@holtzmanvogel.com>; " Tamayo", " Josefina; " Grantham", " Shena;	
254	AHCA0181769- AHCA0181770	Pdf	Attorney-Client; Work-Product	Email between counsel regarding comment letter on AAP Florida Chapter white paper.	7/7/2022 5:23 PM	FW: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	"Wallace", " Thomas J.; <Thomas.Wallace@ahca.myflorida.com>	

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255	AHCA0181795- AHCA0181796	Pdf	Work-Product	Email between Jason Weida and expert witnesses regarding AAP's white paper.	7/7/2022 5:26 PM	FW: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	Andre Van Mol;QUENTIN VAN METER <kidendo@comcast.net>;miriam grossman	Sheeran, Andrew
256	AHCA0181797- AHCA0181812	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
257	AHCA0181821- AHCA0181822	Pdf	Work-Product	Email between Jason Weida and Expert Witness regarding AAP's White Paper.	7/7/2022 5:27 PM	FW: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	James Cantor	
258	AHCA0181823- AHCA0181838	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
259	AHCA0181846- AHCA0181847	Pdf	Work-Product	Email between Jason Weida and General Counsel's Office regarding AAP's White Paper.	7/7/2022 5:28 PM	FW: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	""Farrill"" , "" Cody," "Juarez"" , "" Brock;<Cody.Farrill@ahca.myflorida.com >;<Brock.Juarez@ahca.myflorida.com>	
260	AHCA0181848- AHCA0181863	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
261	AHCA0181872- AHCA0181887	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
262	AHCA0181889- AHCA0181904	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
263	AHCA0181906- AHCA0181921	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
264	AHCA0181978- AHCA0181979	Pdf	Work-Product	Email between expert witnesses and Jason Weida regarding AAP's White Paper.	7/7/2022 6:11 PM	Re: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	miriam grossman	""Weida"" , "" Jason;<Andrew.Sheeran@ahca.myflorida.com>	Andre Van Mol;<kidendo@comcast.net>;Sheeran, Andrew
265	AHCA0181987- AHCA0182002	Pdf	Work-Product	Attachment to email, AAP White Paper.	12/31/9999 7:00 PM				
266	AHCA0182010- AHCA0182011	Pdf	Attorney-Client;Work-Product	Email between Jason Weida and outside counsel regarding AAP's White Paper.	7/7/2022 6:13 PM	FW: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>	
267	AHCA0182019- AHCA0182034	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
268	AHCA0182048- AHCA0182049	Pdf	Work-Product	Email between Jason Weida and expert witness regarding AAP's White Paper.	7/7/2022 7:41 PM	Re: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Andre Van Mol	""Weida"" , "" Jason;<Andrew.Sheeran@ahca.myflorida.com>	<kidendo@comcast.net>;miriam grossman
269	AHCA0182057- AHCA0182072	Pdf	Work-Product	Attachment to Jason Weida's email, AAP White Paper.	12/31/9999 7:00 PM				
270	AHCA0182089- AHCA0182090	Pdf	Work-Product	Email between expert witness and Jason Weida regarding AAP's White Paper.	7/7/2022 8:46 PM	Re: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Andre Van Mol	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	<kidendo@comcast.net>
271	AHCA0182098- AHCA0182113	Pdf	Work-Product	Attachment to Email between Jason Weida and expert witness regarding AAP's White Paper, AAP White Paper.	12/31/9999 7:00 PM				
272	AHCA0182117- AHCA0182119	Pdf	Work-Product	Email between Jason Weida and expert witness regarding AAP's White Paper.	7/7/2022 8:53 PM	Re: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	miriam grossman	Andre Van Mol;<Jason.Weida@ahca.myflorida.com >;<Andrew.Sheeran@ahca.myflorida.com>	Weida, Jason
273	AHCA0182127- AHCA0182142	Pdf	Work-Product	Attachment to Email between Jason Weida and expert witness regarding AAP's White Paper, AAP White Paper.	12/31/9999 7:00 PM				
274	AHCA0182167	Pdf	Work-Product	Email between expert witness and Jason Weida regarding draft comments on AAP White Paper.	7/7/2022 10:23 PM	Re: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Andre Van Mol	Weida Jason	
275	AHCA0182168- AHCA0182183	Pdf	Work-Product	Attachment to expert witness email, AAP White Paper.	12/31/9999 7:00 PM				

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276	AHCA0182185- AHCA0182186	Pdf	Work-Product	Email between Jason Weida and Matt Brackett regarding AAP White Paper.	7/7/2022 11:11 PM	Fwd: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	""Brackett"" , "" Matt;<Matt.Brackett@ahca.myflorida.co m>	
277	AHCA0182187- AHCA0182202	Pdf	Work-Product	Attachment to Email between Jason Weida and Matt Brackett regarding AAP's White Paper, AAP White Paper.	12/31/9999 7:00 PM				
278	AHCA0182207- AHCA0182209	Pdf	Work-Product	Email between Jason Weida and expert witness regarding AAP's White Paper.	7/8/2022 12:29 AM	Re: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Andre Van Mol	Weida Jason;<Andrew.Sheeran@ahca.myflorid a.com>	Van Meter Quentin
279	AHCA0182288- AHCA0182294	Pdf	Work-Product	Email between Jason Weida and expert witness regarding public comments on rulemaking.	7/8/2022 9:01 AM	FW: One-time User Comment From FLRules.com (Privileged & Confidential)	Weida, Jason	QUENTIN VAN METER <kidendo@comcast.net>;Andre Van	Sheeran, Andrew;Brackett, Matt
280	AHCA0182296	Pdf	Attorney- Client;Work- Product	Email between Jason Weida and outside counsel regarding public comments on rulemaking.	7/8/2022 9:16 AM	FW: Comment on Proposed Rule on Coverage for Medical Care/Gender Dysphoria (Privileged & Confidential)	Weida, Jason	<mjazil@holtzmanvogel.com>;<gperko@ holtzmanvogel.com>	Tamayo, Josefina;Grantham, Shena;Sheeran, Andrew
281	AHCA0182297- AHCA0182343	Pdf	Work-Product	Attachment to Jason Weida's email to outside counsel, public comments.	12/31/9999 7:00 PM				
282	AHCA0182344- AHCA0182345	Pdf	Work-Product	Email between Jason Weida, General Counsel, and outside counsel regarding public comments.	7/8/2022 9:25 AM	RE: Comment on Proposed Rule on Coverage for Medical Care/Gender Dysphoria (Privileged & Confidential)	Tamayo, Josefina	""Weida"" , "" Jason;<mjazil@holtzmanvogel.com>;<gp erko@holtzmanvogel.com>	Grantham, Shena;Sheeran,
283	AHCA0182348- AHCA0182354	Pdf	Work-Product	Email between expert witness and Jason Weida regarding response to comments.	7/8/2022 9:43 AM	Re: One-time User Comment From FLRules.com (Privileged & Confidential)	Andre Van Mol	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.co m>	<kidendo@comcast.net>
284	AHCA0182360- AHCA0182362	Pdf	Work-Product	Email between expert witness and Jason Weida regarding response to comments.	7/8/2022 10:17 AM	My question	miriam grossman	Andre Van Mol;<Andrew.Sheeran@ahca.myflorida.c om>	Weida Jason;Van Meter Quentin;Sheeran, Andrew
285	AHCA0182364- AHCA0182366	Pdf	Work-Product	Email between expert witness and Jason Weida regarding response to comments.	7/8/2022 10:26 AM	Re: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Weida, Jason	Andre Van Mol	Van Meter Quentin;Grossman Miriam;Sheeran, Andrew
286	AHCA0182367- AHCA0182370	Pdf	Work-Product	Email between expert witness and Jason Weida regarding response to comments.	7/8/2022 10:26 AM	RE: My question	Weida, Jason	miriam grossman;Andre Van Mol	Van Meter Quentin;Sheeran, Andrew
287	AHCA0182711- AHCA0182712	Pdf	Attorney- Client;Work- Product	Email between General Counsel and outside counsel regarding public comments to rulemaking.	7/9/2022 9:22 AM	Fwd: Comments by Lambda Legal regarding Notice of Proposed Rule Changes to Rule No. 59G-1.050: General Medicaid Policy (Notice No. 25979915), Prohibiting Coverage of Treatment for Gender Dysphoria	Tamayo, Josefina	Mohammad O.	
288	AHCA0182713- AHCA0182725	Pdf	Work-Product	Attachment, public comments from Lambda Legal.	12/31/9999 7:00 PM				
289	AHCA0182783- AHCA0182786	Pdf	Work-Product	Email between expert witness and General Counsel's office regarding rulemaking hearing.	7/9/2022 11:08 PM	Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	miriam grossman	Andre Van Mol;<Andrew.Sheeran@ahca.myflorida.c om>	Weida Jason;Van Meter Quentin;Sheeran, Andrew
290	AHCA0183286	Pdf	Work-Product	Email between Cole Giering and General Counsel's Office regarding public comments.	7/11/2022 10:31 AM	Comments	Giering, Cole	""Sheeran"" , "" Andrew;" "Grantham"" , "" Shena;<Andrew.Sheeran@ahca.myflorid a.com>;<Shena.Grantham@ahca.myflori da.com>	Weida, Jason
291	AHCA0183287	Pdf	Work-Product	Draft public comment.	7/8/2022 5:13 PM	Williams Institute Comment on Florida's Proposed Medicaid Rule (59G-1.050)	Cohen, Cathren	MEDICAID RULE COMMENTS	Mallory, Christy
292	AHCA0183288- AHCA0183295	Pdf	Work-Product	Attachment, public comment on rulemaking hearing.	12/31/9999 7:00 PM				
293	AHCA0183296	Pdf	Work-Product	Attachment, public comment from Lambda Legal.	7/8/2022 5:05 PM	Comments by Lambda Legal regarding Notice of Proposed Rule Changes to Rule No. 59G-1.050: General Medicaid Policy (Notice No. 25979915), Prohibiting Coverage of Treatment for Gender Dysphoria	Omar Gonzalez- Pagan	MEDICAID RULE	

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294	AHCA0183297- AHCA0183309	Pdf	Work-Product	Attachment, public comment from Lambda Legal.	12/31/9999 7:00 PM				
295	AHCA0183310- AHCA0183312	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	7/8/2022 4:48 PM	Proposed rule regarding transgender care comments	Brittany Bruggeman	MEDICAID RULE COMMENTS	
296	AHCA0183313	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	7/8/2022 3:42 PM	Southern Legal Counsel Comment on Proposed Rule, 59G-1.050	Chelsea Dunn	MEDICAID RULE COMMENTS	Chelsea Dunn
297	AHCA0183314- AHCA0183318	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	12/31/9999 7:00 PM				
298	AHCA0183319	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	7/8/2022 3:13 PM	Legal Services Comments in Response to Proposed Rule Change to 59G-1.050	Pamela Flores	MEDICAID RULE COMMENTS	Pamela Flores
299	AHCA0183320- AHCA0183327	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	12/31/9999 7:00 PM				
300	AHCA0183328	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	7/8/2022 3:02 PM	Confirmation of Receipt Request [OPPOSITION to Proposed Denial of Medicaid Coverage for Gender-Affirming Care]	Brittany Williams	MEDICAID RULE COMMENTS	
301	AHCA0183329- AHCA0183333	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	12/31/9999 7:00 PM				
302	AHCA0183334	Pdf	Work-Product	Email regarding public comment to rulemaking hearing.	7/8/2022 2:58 PM	Comment on Amendment to Rule 59G-1.050 to Update Covered Medicaid Services	Sam Ames	MEDICAID RULE COMMENTS	
303	AHCA0183335- AHCA0183337	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
304	AHCA0183338	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/8/2022 2:54 PM	OPPOSITION to Proposed Denial of Medicaid Coverage for Gender-Affirming Care	Brittany Williams	MEDICAID RULE COMMENTS	
305	AHCA0183339- AHCA0183343	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
306	AHCA0183344	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/8/2022 2:51 PM	PPSENFL GAC Medicaid Comment	Filkowski, Annie Jae	MEDICAID RULE COMMENTS	Cahen, Samantha;Goodhue, Laura
307	AHCA0183345- AHCA0183350	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
308	AHCA0183351	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/8/2022 2:47 PM	FHJP and NHeLP Comments on Proposed Rule, 59G-1.050(7), Banning Gender Affirming Care	Abbi Coursolle	MEDICAID RULE COMMENTS	
309	AHCA0183352- AHCA0183356	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
310	AHCA0183357	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/8/2022 1:03 PM	Comment on Proposed Rule No. 59G-1.050: General Medicaid Policy	Ezra Cukor	MEDICAID RULE COMMENTS	
311	AHCA0183358- AHCA0183376	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
312	AHCA0183377	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
313	AHCA0183378	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/8/2022 12:08 PM	HRC Official Comments Re: Rule 59G-1.050 (7)(A) and (B) of the FAC	Courtney Avant	MEDICAID RULE COMMENTS	
314	AHCA0183379- AHCA0183383	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
315	AHCA0183384	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/8/2022 12:04 PM	Corrected comment letter attached: Proposed Rule denying coverage for treatment for gender dysphoria	Alstott, Anne	MEDICAID RULE COMMENTS;Alstott, Anne	
316	AHCA0183385- AHCA0183431	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
317	AHCA0183432	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/8/2022 12:00 PM	Written Comment in Opposition to Proposed Rule Change to 59G-1.050	Carrie McNamara	MEDICAID RULE COMMENTS	Kara Gross
318	AHCA0183433- AHCA0183437	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				

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319	AHCA0183438	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
320	AHCA0183439	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
321	AHCA0183440	Pdf	Work-Product	Email between Cole Giering and General Counsel's Office regarding public comments submitted to AHCA for rulemaking hearing.	7/11/2022 10:32 AM	Comments	Giering, Cole	""Sheeran"" , "" Andrew;" "Grantham"" , "" Shena;<Andrew.Sheeran@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Weida, Jason
322	AHCA0183441	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/11/2022 8:20 AM	FW: User Comment From FLRules.com	Giering, Cole	Weida, Jason;Grantham, Shena	
323	AHCA0183442-AHCA0183446	Pdf	Work-Product	Public comments submitted to AHCA for rulemaking hearing.	7/11/2022 8:23 AM	FW: One-time User Comment From FLRules.com	Giering, Cole	Weida, Jason	
324	AHCA0183447-AHCA0183448	Pdf	Work-Product	Email with Jason Weida regarding public comment to rulemaking hearing.	7/11/2022 8:35 AM	FW: Opposition to AHCA recommendations on Gender Care	MEDICAID RULE COMMENTS	Weida, Jason	
325	AHCA0183449-AHCA0183451	Pdf	Work-Product	Order from similar litigation regarding Dr. van Meter.	12/31/9999 7:00 PM				
326	AHCA0183889	Pdf	Work-Product	Email between General Counsel's Office staff regarding submission of public comments for rulemaking hearing.	7/12/2022 9:03 AM	FW: Comments	Grantham, Shena	""Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
327	AHCA0183890	Pdf	Work-Product	Email between Cole Giering, Jason Weida, and General Counsel's Office regarding Public comments submitted to AHCA for rulemaking	7/11/2022 8:20 AM	FW: User Comment From FLRules.com	Giering, Cole	Weida, Jason;Grantham, Shena	
328	AHCA0183891-AHCA0183895	Pdf	Work-Product	Email between Cole Giering, Jason Weida, and General Counsel's Office regarding Public comments submitted to AHCA for rulemaking	7/11/2022 8:23 AM	FW: One-time User Comment From FLRules.com	Giering, Cole	Weida, Jason	
329	AHCA0183896-AHCA0183897	Pdf	Work-Product	Email between Cole Giering, Jason Weida, and General Counsel's Office regarding Public comments submitted to AHCA for rulemaking	7/11/2022 8:35 AM	FW: Opposition to AHCA recommendations on Gender Care	MEDICAID RULE COMMENTS	Weida, Jason	
330	AHCA0183898-AHCA0183900	Pdf	Work-Product	Attachment, Order regarding Dr. van Meter.	12/31/9999 7:00 PM				
331	AHCA0183901	Pdf	Work-Product	Email between Cole Giering, Jason Weida, and General Counsel's Office regarding Public comments submitted to AHCA for rulemaking	7/11/2022 8:47 AM	FW: Comment: Proposal Amending Rule 59G-1.050, General Medicaid Policy	MEDICAID RULE COMMENTS	Weida, Jason	
332	AHCA0183902-AHCA0183904	Pdf	Work-Product	Attachment, Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
333	AHCA0183905	Pdf	Work-Product	Email regarding Public comments submitted to AHCA for rulemaking hearing.	7/11/2022 8:48 AM	FW: Comment on Proposed Rulemaking - 59G-1.050/General Medicaid Policy	MEDICAID RULE COMMENTS	Weida, Jason	
334	AHCA0183906-AHCA0183940	Pdf	Work-Product	Attachment, Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
335	AHCA0183941	Pdf	Work-Product	Email regarding Public comments submitted to AHCA for rulemaking hearing.	7/11/2022 8:48 AM	FW: Comment on Proposed Rulemaking - 59G-1.050/General Medicaid Policy	MEDICAID RULE COMMENTS	Weida, Jason	
336	AHCA0183942-AHCA0183943	Pdf	Work-Product	Attachment, Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
337	AHCA0183944	Pdf	Work-Product	Attachment to email, logo.	12/31/9999 7:00 PM				
338	AHCA0188835-AHCA0188836	Pdf	Work-Product	Email between Cole Giering and General Counsel's Office regarding Public comments submitted to AHCA for rulemaking hearing.	7/14/2022 9:06 AM	FW: RULE: 59G-1.050 General Medicaid Policy	MEDICAID RULE COMMENTS	""Grantham"" , "" Shena;" "Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Weida, Jason
339	AHCA0188837-AHCA0188864	Pdf	Work-Product	Attachment, Public comments submitted to AHCA for rulemaking hearing.	12/31/9999 7:00 PM				
340	AHCA0188869-AHCA0188871	Pdf	Work-Product	Email between Matt Brackett and General Counsel's Office regarding expert reports.	7/14/2022 9:48 AM	FW: AAP-FCAAP Comment Letter: Medicaid Coverage for Gender Affirming Care (Privileged & Confidential)	Brackett, Matt	""Chen"" , "" Nai;<Nai.Chen@ahca.myflorida.com>	

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341	AHCA0188872- AHCA0188887	Pdf	Work-Product	Attachment, AAP White Paper.	12/31/9999 7:00 PM				
342	AHCA0188888- AHCA0188894	Pdf	Work-Product	Email between Matt Brackett and Nai Chen regarding expert witnesses.	7/14/2022 9:49 AM	FW: One-time User Comment From FLRules.com (Privileged & Confidential)	Brackett, Matt	""Chen"" , "" Nai;<Nai.Chen@ahca.myflorida.com>	
343	AHCA0192681	Pdf	Attorney-Client;Work-Product	Email between General Counsel's office staff regarding comments on DOH Petition.	7/18/2022 9:33 AM	proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Sheeran, Andrew	""Tamayo"" , "" Josefina;" "Kellum"" , "" Kim;" "Grantham"" , "" Shena;<Josefina.Tamayo@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
344	AHCA0192682- AHCA0192683	Pdf	Attorney-Client;Work-Product	Attachment, proposed language by DOH.	12/31/9999 7:00 PM				
345	AHCA0192706	Pdf	Attorney-Client;Work-Product	Email between General Counsel's office staff regarding board proposal.	7/18/2022 10:02 AM	RE: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Sheeran, Andrew	""Tamayo"" , "" Josefina;" "Kellum"" , "" Kim;" "Grantham"" , "" Shena;<Josefina.Tamayo@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
346	AHCA0192707- AHCA0192708	Pdf	Attorney-Client;Work-Product	Attachment, proposed language by DOH.	12/31/9999 7:00 PM				
347	AHCA0192721	Pdf	Attorney-Client;Work-Product	Email between General Counsel office staff regarding board proposal.	7/18/2022 10:13 AM	RE: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Grantham, Shena	""Sheeran"" , "" Andrew;" "Tamayo"" , "" Josefina;" "Kellum"" , "" Kim;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
348	AHCA0196165	Pdf	Attorney-Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 1:58 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Tamayo, Josefina	""Templeton"" , "" Mary Gay;<MaryGay.Templeton@ahca.myflorida.com>	
349	AHCA0196166- AHCA0196167	Pdf	Attorney-Client;Work-Product	Attachment, DOH proposed language.	12/31/9999 7:00 PM				
350	AHCA0196168	Pdf	Attorney-Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 1:58 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
351	AHCA0196169- AHCA0196170	Pdf	Attorney-Client;Work-Product	Attachment, language proposed by DOH.	12/31/9999 7:00 PM				
352	AHCA0196171	Pdf	Attorney-Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 2:01 PM	Proposal [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
353	AHCA0196172- AHCA0196173	Pdf	Attorney-Client;Work-Product	Attachment, language proposed by DOH.	12/31/9999 7:00 PM				
354	AHCA0196207	Pdf	Attorney-Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 2:26 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
355	AHCA0196208- AHCA0196209	Pdf	Attorney-Client;Work-Product	Attachment, notes and comments on language proposed by DOH.	12/31/9999 7:00 PM				
356	AHCA0196210	Pdf	Attorney-Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 2:33 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
357	AHCA0196211- AHCA0196212	Pdf	Attorney-Client;Work-Product	Attachment, notes and comments on language proposed by DOH.	12/31/9999 7:00 PM				

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358	AHCA0199136	Pdf	Attorney-Client;Work-Product	Email between Matt Brackett and General Counsel regarding comments and responses to GAPMS report comments.	7/19/2022 2:45 PM	Comment Summary (ATTORNEY WORK PRODUCT CONFIDENTIAL - PURSUANT TO §119.071(1)(d)1.,F.S.)	Brackett, Matt	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
359	AHCA0199137-AHCA0199153	Pdf	Attorney-Client;Work-Product	Attachment, 59G-1.050 summary.	12/31/9999 7:00 PM				
360	AHCA0199154-AHCA0199160	Pdf	Attorney-Client;Work-Product	Email between Jason Weida and expert witnesses regarding public comments on rulemaking hearing.	7/8/2022 9:01 AM	FW: One-time User Comment From FLRules.com (Privileged & Confidential)	Weida, Jason	QUENTIN VAN METER <kidendo@comcast.net>;Andre Van Mol	Sheeran, Andrew;Brackett, Matt
361	AHCA0199161-AHCA0199188	Pdf	Attorney-Client;Work-Product	Attachment, public comments for rulemaking hearing.	12/31/9999 7:00 PM				
362	AHCA0199189-AHCA0199204	Pdf	Attorney-Client;Work-Product	Attachment, AAP White Paper.	12/31/9999 7:00 PM				
363	AHCA0199205-AHCA0199234	Pdf	Attorney-Client;Work-Product	Attachment, public comments relating to rulemaking hearing.	12/31/9999 7:00 PM				
364	AHCA0199968	Pdf	Attorney-Client;Work-Product	Email between Jason Weida and expert witnesses regarding public comments.	7/19/2022 3:34 PM	Yale (Privileged & Confidential)	Weida, Jason	Andre Van Mol;Van Meter Quentin;miriam grossman	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>
365	AHCA0199969-AHCA0200015	Pdf	Attorney-Client;Work-Product	Attachment, public comments relating to rulemaking hearing.	12/31/9999 7:00 PM				
366	AHCA0200101-AHCA0200102	Pdf	Attorney-Client;Work-Product	Email between expert witness and Jason Weida regarding public comments submitted for rulemaking hearing.	7/19/2022 5:34 PM	Re: Yale (Privileged & Confidential)	Andre Van Mol	""Weida"" , ""Jason;<Josefina.Tamayo@ahca.myflorida.com>	Van Meter Quentin
367	AHCA0200103-AHCA0200149	Pdf	Attorney-Client;Work-Product	Attachment, public comments submitted for rulemaking hearing.	12/31/9999 7:00 PM				
368	AHCA0200159-AHCA0200160	Pdf	Attorney-Client;Work-Product	Email between expert witness and Jason Weida regarding public comments submitted for rulemaking hearing.	7/19/2022 10:53 PM	Re: Yale (Privileged & Confidential)	miriam grossman	Andre Van Mol;""Weida"" , ""Jason;<Jason.Weida@ahca.myflorida.com>;<Josefina.Tamayo@ahca.myflorida.com>	Van Meter Quentin;Tamayo, Josefina;<mjazil@holtzmanvogel.com>
369	AHCA0200161	Pdf	Attorney-Client;Work-Product	Email between expert witness and Jason Weida regarding public comments submitted for rulemaking hearing.	7/20/2022 12:36 AM	Re: Yale (Privileged & Confidential)	Andre Van Mol	Weida Jason	Van Meter Quentin
370	AHCA0200162-AHCA0200172	Pdf	Attorney-Client;Work-Product	Attachment, expert witness notes on public comments submitted for rulemaking hearing.	12/31/9999 7:00 PM				
371	AHCA0200173	Pdf	Attorney-Client;Work-Product	Email between expert witness and Jason Weida regarding public comments submitted for rulemaking hearing.	7/20/2022 12:52 AM	Re: Yale (Privileged & Confidential)	Andre Van Mol	Weida Jason	Van Meter Quentin
372	AHCA0200174-AHCA0200183	Pdf	Attorney-Client;Work-Product	Attachment, paper by Dr. Levine.	12/31/9999 7:00 PM				
373	AHCA0200184-AHCA0200291	Pdf	Attorney-Client;Work-Product	Attachment, Declaration of Dr. Levine.	12/31/9999 7:00 PM				
374	AHCA0201198	Pdf	Attorney-Client;Work-Product	Email exchange between experts and with Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/20/2022 10:30 AM	Re: Yale (Privileged & Confidential)	QUENTIN VAN METER	Andre Van Mol;Weida Jason;<jason.weida@ahca.myflorida.com>	Grossman Miriam;Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>
375	AHCA0204989	Pdf	Attorney-Client	Email from AHCA general counsel's office to counsel regarding July 8, 2022 hearing.	7/20/2022 11:33 AM	Transcription	Templeton, Mary Gay	Mohammad O. Jazil;Gary V. Perko;Michael Beato	Zack Bennington
376	AHCA0204990-AHCA0205080	Pdf	Attorney-Client	Attachment to email from AHCA general counsel's office to counsel regarding hearing.	12/31/9999 7:00 PM				

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377	AHCA0205233	Pdf	Attorney-Client;Work-Product	Email exchange between expert and AHCA Assistant Deputy Secretary for Medicaid and with counsel concerning research and comments that may be used in litigation.	7/20/2022 3:25 PM	RE: Yale (Privileged & Confidential)	Weida, Jason	Andre Van Mol	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;Zack Bennington
378	AHCA0205234	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/20/2022 3:29 PM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	
379	AHCA0205236	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/20/2022 3:30 PM	RE: Yale (Privileged & Confidential)	Weida, Jason	Gary V. Perko	
380	AHCA0205238-AHCA0205240	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and expert with counsel concerning research and comments that may be used in litigation.	7/20/2022 3:30 PM	RE: Yale (Privileged & Confidential)	Weida, Jason	miriam grossman	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>
381	AHCA0205253-AHCA0205255	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and expert with counsel concerning research and comments that may be used in litigation.	7/20/2022 6:53 PM	Re: Yale (Privileged & Confidential)	miriam grossman	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>
382	AHCA0205256-AHCA0205257	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and expert with counsel concerning research and comments that may be used in litigation.	7/20/2022 11:24 PM	Re: Yale (Privileged & Confidential)	Andre Van Mol	Weida Jason	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;Zack Bennington
383	AHCA0206637	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	7/21/2022 10:12 AM	RE: Public comments	Giering, Cole	Gary V. Perko	Weida, Jason
384	AHCA0206638	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	7/8/2022 5:05 PM	Comments by Lambda Legal regarding Notice of Proposed Rule Changes to Rule No. 59G-1.050: General Medicaid Policy (Notice No. 25979915), Prohibiting Coverage of Treatment for Gender Dysphoria	Omar Gonzalez-Pagan	MEDICAID RULE	
385	AHCA0206639-AHCA0206651	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	12/31/9999 7:00 PM				
386	AHCA0206652	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	7/11/2022 4:34 PM	Comment on Hearing for Proposed Rule 59G 1.050	Chelsea Dunn	MEDICAID RULE COMMENTS	
387	AHCA0206653-AHCA0206654	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	12/31/9999 7:00 PM				
388	AHCA0206655	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	7/8/2022 5:13 PM	Williams Institute Comment on Florida's Proposed Medicaid Rule (59G-1.050)	Cohen, Cathren	MEDICAID RULE COMMENTS	Mallory, Christy
389	AHCA0206656-AHCA0206663	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	12/31/9999 7:00 PM				
390	AHCA0209851	Pdf	Attorney-Client;Work-Product	Email from counsel to AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid with legal analysis in anticipation of litigation.	7/21/2022 10:39 AM	PRIVILEGED & CONFIDENTIAL	Gary V. Perko	""Tamayo"" , "" Josefina;" "Weida"" , "" Jason;" "Grantham"" , "" Shena;" "Sheeran"" , "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>	Mohammad O. Jazil
391	AHCA0209852-AHCA0209882	Pdf	Attorney-Client;Work-Product	Attachment to email from counsel to AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid with legal analysis in anticipation of litigation.	12/31/9999 7:00 PM				

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392	AHCA0209884- AHCA0209886	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and expert with counsel concerning research and comments that may be used in litigation.	7/21/2022 10:48 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	miriam grossman	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>
393	AHCA0211232	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA General Counsel's Office regarding legal analysis in anticipation of litigation.	7/21/2022 11:19 AM	Re: PRIVILEGED & CONFIDENTIAL	Tamayo, Josefina	Gary V. Perko;" "Weida"" "" Jason;" "Grantham"" "" Shena;" "Sheeran"" "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
394	AHCA0211234	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office and AHCA Secretary regarding counsel's legal analysis in anticipation of litigation.	7/21/2022 11:20 AM	Fwd: PRIVILEGED & CONFIDENTIAL	Tamayo, Josefina	""Marsteller"" "" Simone;<Simone.Marsteller@ahca.myflorida.com>	
395	AHCA0211235- AHCA0211265	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office and AHCA Secretary regarding counsel's legal analysis in anticipation of litigation.	12/31/9999 7:00 PM				
396	AHCA0211282	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office counsel and EOG regarding legal analysis in anticipation of litigation.	7/21/2022 4:50 PM	Fwd: PRIVILEGED & CONFIDENTIAL	Tamayo, Josefina	Ryan D. Newman;" "Furino"" "" Maureen;<maureen.furino@eog.myflorida.com>	
397	AHCA0211283- AHCA0211313	Pdf	Attorney-Client;Work-Product	Attachment to email between AHCA General Counsel's Office counsel regarding legal analysis in anticipation of litigation.	12/31/9999 7:00 PM				
398	AHCA0226988- AHCA0226990	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:01 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	miriam grossman	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>
399	AHCA0226991- AHCA0226992	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:02 AM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Weida"" "" Jason;<Josefina.Tamayo@ahca.myflorida.com>	Tamayo, Josefina;Mohammad O. Jazil
400	AHCA0226994- AHCA0226996	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:13 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	Gary V. Perko	Tamayo, Josefina;Mohammad O. Jazil
401	AHCA0226998- AHCA0227000	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:16 AM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Weida"" "" Jason;<Josefina.Tamayo@ahca.myflorida.com>	Tamayo, Josefina;Mohammad O. Jazil
402	AHCA0227002- AHCA0227004	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:17 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	Gary V. Perko	Tamayo, Josefina;Mohammad O. Jazil
403	AHCA0227006- AHCA0227008	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and expert with counsel concerning research and comments that may be used in litigation.	7/25/2022 9:18 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	Gary V. Perko	Tamayo, Josefina;Mohammad O. Jazil
404	AHCA0227014- AHCA0227016	Pdf	Attorney-Client;Work-Product	Email exchange between General Counsel's Office and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:23 AM	RE: Yale (Privileged & Confidential)	Tamayo, Josefina	Gary V. Perko;" "Weida"" "" Jason;<Jason.Weida@ahca.myflorida.com>	Mohammad O. Jazil
405	AHCA0227019- AHCA0227021	Pdf	Attorney-Client;Work-Product	Email exchange between General Counsel's Office and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:25 AM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Tamayo"" "" Josefina;" "Weida"" "" Jason;<Jason.Weida@ahca.myflorida.com>	Mohammad O. Jazil
406	AHCA0227024- AHCA0227027	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and expert with counsel concerning research and comments that may be used in litigation.	7/25/2022 9:47 AM	Re: Yale (Privileged & Confidential)	miriam grossman	""Weida"" "" Jason;<Josefina.Tamayo@ahca.myflorida.com>	Tamayo, Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>

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407	AHCA0232369	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research that may be used in litigation.	7/28/2022 10:37 AM	Privileged & Confidential	Weida, Jason	Mohammad O. Jazil;<gperko@holtzmanvogel.com>	Tamayo, Josefina;Sheeran, Andrew;Grantham, Shena;Kellum, Kim
408	AHCA0232370-AHCA0232380	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research that may be used in	12/31/9999 7:00 PM				
409	AHCA0232381-AHCA0232388	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research that may be used in	12/31/9999 7:00 PM				
410	AHCA0235356-AHCA0235357	Pdf	Work-Product	Email exchange between Florida Department of Health Office of General Counsel and AHCA General Counsel's Office re: DOH Petition to Initiate Rulemaking.	7/29/2022 3:10 PM	FW: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Wilson, John	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
411	AHCA0235602-AHCA0235603	Pdf	Work-Product	Email exchange between Florida Department of Health Office of General Counsel and AHCA General Counsel's Office re: DOH Petition to Initiate Rulemaking.	7/29/2022 3:17 PM	Fwd: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Josefina	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
412	AHCA0235848-AHCA0235849	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office to counsel and Assistant Deputy Secretary for Medicaid re: Florida Department of Health Petition to Initiate Rulemaking.	7/29/2022 3:41 PM	FW: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Josefina	<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>; "Grantham"" , ""Shena," "Weida"" , "" Jason," " Kellum"," Kim	
413	AHCA0235850-AHCA0236093	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office to counsel and Assistant Deputy Secretary for Medicaid re: Florida Department of Health Petition to Initiate Rulemaking.	12/31/9999 7:00 PM				
414	AHCA0236399-AHCA0236400	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Florida Department of Health General Counsel re: DOH Petition to Initiate Rulemaking.	7/30/2022 9:45 AM	Re: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Josefina	""Wilson"" , ""John;<John.Wilson@flhealth.gov>	
415	AHCA0242741-AHCA0242742	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Florida Department of Health General Counsel re: DOH Petition to Initiate Rulemaking.	8/1/2022 8:27 AM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Wilson, John	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
416	AHCA0242743-AHCA0242744	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid re: DOH Petition to Initiate Rulemaking.	8/1/2022 8:27 AM	Fwd: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Josefina	""Weida"" , ""Jason;<Jason.Weida@ahca.myflorida.com>	
417	AHCA0242768	Pdf	Attorney-Client	Email exchange between AHCA Program Administrator and counsel concerning written comments on Proposed Rule 59G-1.050.	8/1/2022 9:13 AM	RE: PRIVILEGED & CONFIDENTIAL - ATTORNEY WORK PRODUCT	Giering, Cole	Gary V. Perko	Weida, Jason
418	AHCA0242769	Pdf	Attorney-Client	Attachment to email exchange between AHCA Program Administrator and counsel concerning written comments on Proposed Rule 59G-1.050.	7/9/2022 3:18 PM	Comment: Proposal Amending Rule 59G-1:050, General Medicaid Policy	Jon Harris Maurer	MEDICAID RULE COMMENTS	
419	AHCA0242770-AHCA0242772	Pdf	Attorney-Client	Attachment to email exchange between AHCA Program Administrator and counsel concerning written comments on Proposed Rule 59G-1.050.	12/31/9999 7:00 PM				
420	AHCA0243143	Pdf	Attorney-Client	Email exchange between AHCA Public Records Office and General Counsel's Office re: draft response to records request.	8/1/2022 1:40 PM	349948 public records request review	Gavins, Alexandra	""George"" , "" Tracy," "Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
421	AHCA0243144-AHCA0243234	Pdf	Attorney-Client	Attachment to email exchange between AHCA Public Records Office and General Counsel's Office re: draft response to records request.	12/31/9999 7:00 PM				
422	AHCA0243235	Pdf	Attorney-Client	Attachment to email exchange between AHCA Public Records Office and General Counsel's Office re: draft response to records request.	7/15/2022 2:46 PM	Public Record Request	John Burke	PublicRecordsReq	
423	AHCA0243268-AHCA0243269	Pdf	Attorney-Client;Work-Product	Email exchange from AHCA Assistant Deputy Secretary for Medicaid to Deputy Secretary of Medicaid and General Counsel's Office re: adoption packet for Rule 59G-1.050.	8/1/2022 1:57 PM	FW: Adoption Packet for 59G-1.050 [PRIVILEGED & CONFIDENTIAL]	Weida, Jason	Wallace, Thomas J.;Tamayo, Josefina	Sheeran, Andrew;Grantham, Shena;Kellum, Kim

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424	AHCA0243270- AHCA0243282	Pdf	Attorney-Client;Work-Product	Attachment to email exchange from AHCA Chief of Staff to AHCA Deputy Secretary of Medicaid and General Counsel's Office re: adoption packet for Rule 59G-1.050.	12/31/9999 7:00 PM				
425	AHCA0243284- AHCA0243285	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and AHCA Secretary and Chief of Staff re: adoption packet for Rule 59G-1.050.	8/1/2022 2:01 PM	FW: Adoption Packet for 59G-1.050 [PRIVILEGED & CONFIDENTIAL]	Tamayo, Josefina	""Marstiller"" "" Simone;<Simone.Marstiller@ahca.myflorida.com>	Farrill, Cody
426	AHCA0243286- AHCA0243298	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA General Counsel's Office and AHCA Secretary and Chief of Staff re: adoption packet for Rule 59G-	12/31/9999 7:00 PM				
427	AHCA0243300- AHCA0243301	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office counsel re: adoption packet for Rule 59G-1.050.	8/1/2022 2:02 PM	FW: Adoption Packet for 59G-1.050 [PRIVILEGED & CONFIDENTIAL]	Tamayo, Josefina	""Grantham"" "" Shena;" "Kellum"" "" Kim;<Kim.Kellum@ahca.myflorida.com>; <Shena.Grantham@ahca.myflorida.com>	Sheeran, Andrew
428	AHCA0243302- AHCA0243314	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA General Counsel's Office counsel re: adoption packet for Rule 59G-1.050.	12/31/9999 7:00 PM				
429	AHCA0243316- AHCA0243317	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and counsel re: adoption packet for Rule 59G-1.050.	8/1/2022 2:04 PM	FW: Adoption Packet for 59G-1.050 [PRIVILEGED & CONFIDENTIAL]	Tamayo, Josefina	<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>	Sheeran, Andrew
430	AHCA0243318- AHCA0243330	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA General Counsel's Office and counsel re: adoption packet for Rule 59G-1.050.	12/31/9999 7:00 PM				
431	AHCA0243332	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: legal inquiry concerning public records request response.	8/1/2022 2:20 PM	FW: 349948 public records request review	George, Tracy	""Grantham"" "" Shena;" "Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	
432	AHCA0243333- AHCA0243423	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: legal inquiry concerning public records request response.	12/31/9999 7:00 PM				
433	AHCA0243424	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: legal inquiry concerning public records request response.	7/15/2022 2:46 PM	Public Record Request	John Burke	PublicRecordsReq	
434	AHCA0243949- AHCA0243955	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 9:34 AM	FW: Public Records Daily Log	George, Tracy	""Helton"" "" Joseph;" "Tamayo"" "" Josefina;" "Grantham"" "" Shena;" "Kellum"" "" Kim;" "Hoeler"" "";Thomas;<Thomas.Hoeler@ahca.myflorida.com>;<Josefina.Tamayo@ahca.myflorida.com>	
435	AHCA0243956- AHCA0243963	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 9:37 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	
436	AHCA0243964- AHCA0243971	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 10:03 AM	RE: Public Records Daily Log	George, Tracy	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
437	AHCA0243972	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 10:15 AM	Experts in Arizona case	Gary V. Perko	""Weida"" "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	
438	AHCA0243973- AHCA0243990	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	12/31/9999 7:00 PM				
439	AHCA0243991- AHCA0244059	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	12/31/9999 7:00 PM				

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440	AHCA0244061	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 10:19 AM	RE: Experts in Arizona case	Weida, Jason	Gary V. Perko;Mohammad O. Jazil	
441	AHCA0244063	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 10:23 AM	RE: Experts in Arizona case	Gary V. Perko	""Weida""; "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	
442	AHCA0244065- AHCA0244072	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 10:39 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George""; "" Tracy;<Tracy.George@ahca.myflorida.com>	
443	AHCA0244073	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding analysis of caselaw in anticipation of litigation.	8/2/2022 10:48 AM	UK Decision	Gary V. Perko	""Weida""; "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	
444	AHCA0244074- AHCA0244111	Pdf	Attorney-Client;Work-Product	Attachment to email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis in anticipation of litigation.	12/31/9999 7:00 PM				
445	AHCA0244113- AHCA0244120	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 11:00 AM	FW: Public Records Daily Log	Gavins, Alexandra	""George""; "" Tracy;"" Tamayo""; "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
446	AHCA0244121	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 11:00 AM	RE: UK Decision	Mohammad O. Jazil	Gary V. Perko;"" Weida""; "" Jason;<Jason.Weida@ahca.myflorida.com>	
447	AHCA0244123	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 11:25 AM	RE: UK Decision	Gary V. Perko	Mohammad O. Jazil;"" Weida""; "" Jason;<Jason.Weida@ahca.myflorida.com>	
448	AHCA0244125- AHCA0244132	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: legal review of public records request responses.	8/2/2022 11:28 AM	FW: Public Records Daily Log	Tamayo, Josefina	""George""; "" Tracy;<Tracy.George@ahca.myflorida.com>	
449	AHCA0244139- AHCA0244146	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 12:18 PM	RE: Public Records Daily Log	George, Tracy	Tamayo, Josefina;Gavins, Alexandra	
450	AHCA0244147- AHCA0244148	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 12:27 PM	RE: Experts in Arizona case	Gary V. Perko	""Weida""; "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	
451	AHCA0244159- AHCA0244167	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 1:22 PM	RE: Public Records Daily Log	Gavins, Alexandra	""George""; "" Tracy;"" Tamayo""; "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
452	AHCA0244168- AHCA0244176	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 2:47 PM	RE: Public Records Daily Log	Gavins, Alexandra	""George""; "" Tracy;"" Tamayo""; "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
453	AHCA0244177- AHCA0244185	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 2:52 PM	RE: Public Records Daily Log	George, Tracy	Gavins, Alexandra;Tamayo, Josefina	
454	AHCA0244186	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/2/2022 4:09 PM	Information Needed in the Morning	George, Tracy	""Gavins""; "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
455	AHCA0244197	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/3/2022 7:29 AM	RE: Information Needed in the Morning	Gavins, Alexandra	""George""; "" Tracy;<Tracy.George@ahca.myflorida.com>	
456	AHCA0244198- AHCA0244199	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/3/2022 8:24 AM	RE: Information Needed in the Morning	George, Tracy	""Gavins""; "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	

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457	AHCA0244200- AHCA0244201	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	8/3/2022 8:33 AM	Pending Public Records Requests related to proposed rule 59G-1.050	George, Tracy	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
458	AHCA0244202	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	7/20/2022 11:42 AM	Request for Records: 7/8/22 Notice of Proposed Rule Hearing	Kumar, Vatsala (HHS/OCR)	PublicRecordsReq	
459	AHCA0244203	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	7/19/2022 3:27 PM	Public Records Request Fla. Admin. Code R. 59G-1.050	Katy DeBriere	PublicRecordsReq	
460	AHCA0244204	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	7/30/2022 12:08 AM	Pediatric Gender Dysphoria Treated in Florida	Haller,Michael James	PublicRecordsReq	Haller,Michael James
461	AHCA0244205- AHCA0244206	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	8/3/2022 8:34 AM	Fwd: Pending Public Records Requests related to proposed rule 59G-1.050	Tamayo, Josefina	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
462	AHCA0244207	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	7/20/2022 11:42 AM	Request for Records: 7/8/22 Notice of Proposed Rule Hearing	Kumar, Vatsala (HHS/OCR)	PublicRecordsReq	
463	AHCA0244208	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	7/19/2022 3:27 PM	Public Records Request Fla. Admin. Code R. 59G-1.050	Katy DeBriere	PublicRecordsReq	
464	AHCA0244209	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	7/30/2022 12:08 AM	Pediatric Gender Dysphoria Treated in Florida	Haller,Michael James	PublicRecordsReq	Haller,Michael James
465	AHCA0244210- AHCA0244217	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/3/2022 9:01 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" , ""Tracy;<Tracy.George@ahca.myflorida.com>	
466	AHCA0244218- AHCA0244225	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/3/2022 9:04 AM	RE: Public Records Daily Log	George, Tracy	""Gavins"" , ""Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	Tamayo, Josefina;Hoeler, Thomas
467	AHCA0244226- AHCA0244233	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/3/2022 9:47 AM	RE: Public Records Daily Log	Hoeler, Thomas	""George"" , ""Tracy;" "Gavins"" , ""Alexandra;<Alexandra.Gavins@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
468	AHCA0244234- AHCA0244235	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/3/2022 10:03 AM	FW: Pending Public Records Requests related to proposed rule 59G-1.050	George, Tracy	""Tamayo"" , ""Josefina;" "Sheeran"" , ""Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
469	AHCA0244236	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	7/20/2022 11:42 AM	Request for Records: 7/8/22 Notice of Proposed Rule Hearing	Kumar, Vatsala (HHS/OCR)	PublicRecordsReq	
470	AHCA0244237	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	7/19/2022 3:27 PM	Public Records Request Fla. Admin. Code R. 59G-1.050	Katy DeBriere	PublicRecordsReq	
471	AHCA0244238	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	7/30/2022 12:08 AM	Pediatric Gender Dysphoria Treated in Florida	Haller,Michael James	PublicRecordsReq	Haller,Michael James
472	AHCA0244239- AHCA0244247	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: legal review of public records request responses.	8/3/2022 10:23 AM	RE: Public Records Daily Log	George, Tracy	""Hoeler"" , ""Thomas;<Thomas.Hoeler@ahca.myflorida.com>	
473	AHCA0244266- AHCA0244267	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking.	8/3/2022 2:14 PM	FW: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Josefina	""Weida"" , ""Jason;" "Sheeran"" , ""Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	

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474	AHCA0244268- AHCA0244511	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking.	12/31/9999 7:00 PM				
475	AHCA0244513- AHCA0244514	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking.	8/3/2022 3:29 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Weida, Jason	""Tamayo"" , "" Joseфина," "Sheeran"" , "" Andrew;<Joseфина.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
476	AHCA0244515- AHCA0244517	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 3:32 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Joseфина	""Weida"" , "" Jason," "Sheeran"" , "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
477	AHCA0244526- AHCA0244528	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 3:42 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Weida, Jason	""Tamayo"" , "" Joseфина," "Sheeran"" , "" Andrew;<Joseфина.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
478	AHCA0244529- AHCA0244531	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 3:45 PM	Re: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Joseфина	""Weida"" , "" Jason," "Sheeran"" , "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
479	AHCA0244532- AHCA0244534	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 3:46 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Weida, Jason	""Tamayo"" , "" Joseфина," "Sheeran"" , "" Andrew;<Joseфина.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
480	AHCA0244535- AHCA0244537	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 3:47 PM	Re: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Joseфина	""Weida"" , "" Jason," "Sheeran"" , "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
481	AHCA0244547- AHCA0244549	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 5:09 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Weida, Jason	""Tamayo"" , "" Joseфина," "Sheeran"" , "" Andrew;<Joseфина.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
482	AHCA0244550- AHCA0244553	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 5:27 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Joseфина	""Weida"" , "" Jason," "Sheeran"" , "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
483	AHCA0244617- AHCA0244620	Pdf	Attorney-Client	Email between AHCA General Counsel, Chief of Staff, and Secretary regarding public event invitation.	8/3/2022 7:16 PM	FW: Invitation to Florida Surgeon General	Marstillier, Simone	""Tamayo"" , Joseфина;<Joseфина.Tamayo@ahca.myflorida.com>	
484	AHCA0245079- AHCA0245080	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/4/2022 10:34 AM	RE: Information Needed in the Morning	George, Tracy	""Gavins"" , "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	Tamayo, Joseфина;Sheeran, Andrew
485	AHCA0245083- AHCA0245084	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/4/2022 12:11 PM	RE: Information Needed in the Morning	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
486	AHCA0245128- AHCA0245130	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/4/2022 1:26 PM	RE: Information Needed in the Morning	George, Tracy	""Gavins"" , "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
487	AHCA0245133	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid and General Counsel's Office with legal analysis in anticipation of litigation.	8/4/2022 3:02 PM	PRIVILEGED & CONFIDENTIAL - ATTORNEY WORK PRODUCT	Gary V. Perko	""Tamayo"" , "" Joseфина," "Weida"" , "" Jason," "Sheeran"" , "" Andrew," "Grantham"" , "" Shena;<Joseфина.Tamayo@ahca.myflorida.com>	Mohammad O. Jazil;Michael
488	AHCA0245134- AHCA0245163	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid and General Counsel's Office with legal analysis in anticipation of litigation.	12/31/9999 7:00 PM				

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489	AHCA0245168	Pdf	Attorney-Client;Work-Product	Email exchange between counsel in AHCA General Counsel's Office with counsel's legal analysis in anticipation of litigation.	8/4/2022 3:10 PM	FW: PRIVILEGED & CONFIDENTIAL - ATTORNEY WORK PRODUCT	Tamayo, Josefina	""Kellum"" , "" Kim;" "Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
490	AHCA0245169-AHCA0245198	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel in AHCA General Counsel's Office with counsel's legal analysis in anticipation of litigation.	12/31/9999 7:00 PM				
491	AHCA0245200	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office to General Counsel for Florida Department of Health re: caselaw in anticipation of litigation.	8/4/2022 3:12 PM	Case law Update	Tamayo, Josefina	<john.wilson@flhealth.gov>	
492	AHCA0245201-AHCA0245230	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office to General Counsel for Florida Department of Health re: caselaw in anticipation of litigation.	12/31/9999 7:00 PM				
493	AHCA0245231	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office to EOG counsel re: caselaw in anticipation of litigation.	8/4/2022 3:13 PM	Case Law Update	Tamayo, Josefina	""Furino"" , "" Maureen;<maureen.furino@eog.myflorida.com>	
494	AHCA0245232-AHCA0245261	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office to EOG counsel re: caselaw in anticipation of litigation.	12/31/9999 7:00 PM				
495	AHCA0246875-AHCA0246882	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/9/2022 8:41 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
496	AHCA0246883-AHCA0246891	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/9/2022 9:26 AM	RE: Public Records Daily Log	George, Tracy	Gavins, Alexandra;Hoeler, Thomas;Tamayo, Josefina	
497	AHCA0246938	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.	12/31/9999 7:00 PM				
498	AHCA0246939	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.	12/31/9999 7:00 PM				
499	AHCA0246940	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.	12/31/9999 7:00 PM				
500	AHCA0246941	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.	12/31/9999 7:00 PM				
501	AHCA0246942	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.	12/31/9999 7:00 PM				
502	AHCA0246970	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office, Public Records Office, and Deputy Secretary for Medicaid re: public records request.	8/9/2022 11:34 AM	Public Records Request	George, Tracy	""Wallace"" , "" Thomas J.;<Thomas.Wallace@ahca.myflorida.com>	Tamayo, Josefina;Kellum, Kim;Sheeran, Andrew;Weida, Jason
503	AHCA0246971	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office, Public Records Office, and Deputy Secretary for Medicaid re: public records request.	7/30/2022 12:08 AM	Pediatric Gender Dysphoria Treated in Florida	Haller,Michael James	PublicRecordsReq	Haller,Michael James
504	AHCA0247295	Pdf	Attorney-Client	Email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions from General Counsel's Office about public records request.	8/10/2022 11:52 AM	FW: Public Records Request	Wallace, Thomas J.	""Barry"" , "" Joycee;<Joycee.Barry@ahca.myflorida.com>	
505	AHCA0247296	Pdf	Attorney-Client	Attachment to email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions from General Counsel's Office about public records request.	7/30/2022 12:08 AM	Pediatric Gender Dysphoria Treated in Florida	Haller,Michael James	PublicRecordsReq	Haller,Michael James
506	AHCA0247297-AHCA0247305	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 12:33 PM	FW: Public Records Daily Log	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
507	AHCA0247320	Pdf	Attorney-Client	Email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions from General Counsel's Office about public records request.	8/10/2022 12:47 PM	Fwd: Public Records Request	Barry, Joycee	""Creel"" , "" Victoria;<Victoria.Creel@ahca.myflorida.com>	

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508	AHCA0247321	Pdf	Attorney-Client	Attachment to email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions from General Counsel's Office about public records request.	7/30/2022 12:08 AM	Pediatric Gender Dysphoria Treated in Florida	Haller, Michael James	PublicRecordsReq	Haller, Michael James
509	AHCA0247336	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 1:59 PM	350062 review	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
510	AHCA0247337- AHCA0247427	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	12/31/9999 7:00 PM				
511	AHCA0247430- AHCA0247431	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 2:18 PM	Response to Public Records Request - CorrFlow #350062	George, Tracy	""Tamayo"" , "" Josefine;" "Juarez"" , "" Brock;" "Gavins"" , "" Alexandra;<Brock.Juarez@ahca.myflorida.com>;<Alexandra.Gavins@ahca.myflorida.com>	
512	AHCA0247432- AHCA0247522	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	12/31/9999 7:00 PM				
513	AHCA0247523	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	7/20/2022 11:42 AM	Request for Records: 7/8/22 Notice of Proposed Rule Hearing	Kumar, Vatsala (HHS/OCR)	PublicRecordsReq	
514	AHCA0247539- AHCA0247540	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 3:08 PM	FW: Response to Public Records Request - CorrFlow #350062	Gavins, Alexandra	""Colson"" , "" Max;<Max.Colson@ahca.myflorida.com>	
515	AHCA0247541- AHCA0247631	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	12/31/9999 7:00 PM				
516	AHCA0247632	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	7/20/2022 11:42 AM	Request for Records: 7/8/22 Notice of Proposed Rule Hearing	Kumar, Vatsala (HHS/OCR)	PublicRecordsReq	
517	AHCA0247742	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: pending public records requests.	8/10/2022 4:55 PM	records requests	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
518	AHCA0247743	Excel	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: pending public records requests.	12/31/9999 7:00 PM				
519	AHCA0247749- AHCA0247757	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/11/2022 9:34 AM	FW: Public Records Daily Log	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
520	AHCA0247760- AHCA0247768	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/11/2022 9:45 AM	FW: Public Records Daily Log	George, Tracy	Gavins, Alexandra;Hoeler, Thomas	
521	AHCA0247769- AHCA0247778	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/11/2022 10:17 AM	RE: Public Records Daily Log	Hoeler, Thomas	""George"" , "" Tracy;" "Gavins"" , "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
522	AHCA0247782	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: pending public records requests.	8/11/2022 1:41 PM	FW: records requests	George, Tracy	""Belmont"" , "" Catherine;<Catherine.Belmont@ahca.myflorida.com>	
523	AHCA0247783	Excel	Attorney-Client	Internal notes and tracker for Agency media responses.	12/31/9999 7:00 PM				
524	AHCA0247791	Pdf	Attorney-Client	Email between counsel regarding AHCA Rule Letter from Senator Book.	8/11/2022 4:25 PM	FW: Letter from Senate Minority Leader Book	Farrill, Cody	""Weida"" , "" Jason;" "Tamayo"" , "" Josefine;" "Juarez"" , "" Brock;" "Zander"" , "" Lindsey;<Lindsey.Zander@ahca.myflorida.com>;<Jason.Weida@ahca.myflorida.com>	

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525	AHCA0247792	Pdf	Attorney-Client	Attachment to email between counsel regarding Senator Book's letter.	12/31/9999 7:00 PM				
526	AHCA0247793	Pdf	Attorney-Client	Email from Chief of Staff to General Counsel's Office regarding Senator Book's letter.	8/11/2022 4:27 PM	FW: Letter from Senate Minority Leader Book	Weida, Jason	""Sheeran"" , ""Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
527	AHCA0247794	Pdf	Attorney-Client	Attachment to email between counsel regarding Senator Book's letter.	12/31/9999 7:00 PM				
528	AHCA0259805	Pdf	Attorney-Client	Email between General Counsel's Office regarding Senator Book's AHCA Rule Letter.	8/15/2022 10:35 AM	FW: Letter from Senate Minority Leader Book	Tamayo, Josefina	""Kellum"" , ""Kim;" "Grantham"" , ""Shena;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Sheeran, Andrew
529	AHCA0259806	Pdf	Attorney-Client	Attachment to email between General Counsel's Office regarding Senator Book's AHCA Rule Letter.	12/31/9999 7:00 PM				
530	AHCA0260387-AHCA0260388	Pdf	Attorney-Client	Email between Chief of Staff and General Counsel regarding ADF's request for interview.	8/15/2022 3:01 PM	FW: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Weida, Jason	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
531	AHCA0260443-AHCA0260444	Pdf	Attorney-Client	Email between Chief of Staff and General Counsel regarding ADF's request for interview.	8/16/2022 6:28 AM	Re: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefina	""Weida"" , ""Jason;<Jason.Weida@ahca.myflorida.com>	
532	AHCA0260446-AHCA0260447	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and General Counsel regarding ADF's request for interview.	8/16/2022 6:45 AM	Fwd: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefina	""Marsteller"" , ""Simone;<Simone.Marsteller@ahca.myflorida.com>	
533	AHCA0260718-AHCA0260719	Pdf	Attorney-Client	Email between AHCA General Counsel and EOG General Counsel's Office regarding ADF's request for interview.	8/16/2022 7:49 AM	Fwd: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefina	""Clemmons-Haire"" , ""Mary;<Mary.Haire@ahca.myflorida.com>	
534	AHCA0260721-AHCA0260722	Pdf	Attorney-Client	Email between AHCA General Counsel's Office regarding ADF's request for interview.	8/16/2022 8:07 AM	RE: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Clemmons-Haire, Mary	""Tamayo"" , ""Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
535	AHCA0260724-AHCA0260726	Pdf	Attorney-Client	Email between AHCA General Counsel's Office regarding ADF's request for interview.	8/16/2022 8:08 AM	Re: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefina	""Clemmons-Haire"" , ""Mary;<Mary.Haire@ahca.myflorida.com>	
536	AHCA0260917-AHCA0260918	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel and EOG General Counsel's Office regarding ADF request to interview Chief of Staff.	8/16/2022 9:48 AM	FW: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefina	""Furino"" , ""Maureen;<maureen.furino@eog.myflorida.com>	
537	AHCA0262301	Pdf	Attorney-Client;Work-Product	Email between Holtzman Vogel and Chief of Staff regarding court order in litigation.	8/16/2022 2:19 PM	ATTORNEY WORK PRODUCT	Gary V. Perko	""Weida"" , ""Jason;<Jason.Weida@ahca.myflorida.com>	
538	AHCA0262302-AHCA0262357	Pdf	Attorney-Client;Work-Product	Attachment to email between Holtzman Vogel and Chief of Staff regarding court order in litigation.	12/31/9999 7:00 PM				
539	AHCA0263186	Pdf	Attorney-Client	Email between Public Records and T. George regarding outstanding records requests and media requests.	8/17/2022 9:56 AM		Gavins, Alexandra	""George"" , ""Tracy;<Tracy.George@ahca.myflorida.com>	
540	AHCA0263187	Excel	Attorney-Client	Attachment to email between Public Records and T. George regarding outstanding records requests and media requests.	12/31/9999 7:00 PM				
541	AHCA0264995-AHCA0264996	Pdf	Attorney-Client	Email between General Counsel staff and public records regarding outstanding records and media requests.	8/17/2022 11:04 AM	FW: records requests	Belmont, Catherine	""Gavins"" , ""Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
542	AHCA0264997	Excel	Attorney-Client	Attachment to email between General Counsel staff and public records regarding outstanding records and media requests; media tracker.	12/31/9999 7:00 PM				
543	AHCA0266505	Pdf	Work-Product	Email between General Counsel staff regarding staff duties for media response.	8/18/2022 2:27 PM	RE: Draft memo	Grantham, Shena	""Clemmons-Haire"" , ""Mary;<Mary.Haire@ahca.myflorida.com>	

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544	AHCA0267158-AHCA0267166	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/22/2022 1:42 PM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" , ""Tracy;<Tracy.George@ahca.myflorida.com>	
545	AHCA0267173-AHCA0267182	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/22/2022 2:15 PM	RE: Public Records Daily Log	George, Tracy	""Gavins"" , ""Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
546	AHCA0267200	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/22/2022 3:08 PM	status check of records requests	Gavins, Alexandra	""George"" , ""Tracy;<Tracy.George@ahca.myflorida.com>	
547	AHCA0267201	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.	12/31/9999 7:00 PM				
548	AHCA0267288	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/23/2022 1:09 PM	RE: public records	Gavins, Alexandra	""George"" , ""Tracy;<Tracy.George@ahca.myflorida.com>	
549	AHCA0267289	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.	12/31/9999 7:00 PM				
550	AHCA0267290-AHCA0267291	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/23/2022 1:14 PM	FW: public records	George, Tracy	""Gavins"" , ""Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
551	AHCA0267292	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.	12/31/9999 7:00 PM				
552	AHCA0267296-AHCA0267299	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/23/2022 1:21 PM	RE: Public Records Request	George, Tracy	""Tamayo"" , ""Josefina;" "Sheeran"" , ""Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
553	AHCA0267300	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.	12/31/9999 7:00 PM				
554	AHCA0273234	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office and Chief of Staff regarding recent court order.	8/25/2022 1:08 PM	Privileged & Confidential	Weida, Jason	""Tamayo"" , ""Josefina;" "Sheeran"" , ""Andrew;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
555	AHCA0273235-AHCA0273245	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office and Chief of Staff regarding recent court order; court order.	12/31/9999 7:00 PM				
556	AHCA0273246	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office and Chief of Staff regarding recent court order.	8/25/2022 1:08 PM		Weida, Jason	Jason Weida	
557	AHCA0273247-AHCA0273257	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office and Chief of Staff regarding recent court order; court order.	12/31/9999 7:00 PM				
558	AHCA0273305-AHCA0273306	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office and outside counsel regarding litigation.	8/25/2022 6:06 PM	FW: Data File (Privileged & Confidential)	Weida, Jason	""Sheeran"" , ""Andrew;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>;<Andrew.Sheeran@ahca.myflorida.com>	
559	AHCA0273307	Excel	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office and outside counsel regarding litigation.	12/31/9999 7:00 PM				
560	AHCA0274220-AHCA0274221	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office, AHCA Chief of Staff, and outside counsel regarding litigation.	8/26/2022 8:45 AM	RE: Data File (Privileged & Confidential)	Sheeran, Andrew	""Weida"" , ""Jason;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>;<Jason.Weida@ahca.myflorida.com>	
561	AHCA0275213-AHCA0275214	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office, AHCA Chief of Staff, and outside counsel regarding litigation.	8/26/2022 12:42 PM	RE: Data File (Privileged & Confidential)	Weida, Jason	""Sheeran"" , ""Andrew;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>	

	A	B	C	D	E	F	G	H	I
562	AHCA0275215-AHCA0275221	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office, AHCA Chief of Staff, and outside counsel regarding litigation.	12/31/9999 7:00 PM				
563	AHCA0277154	Pdf	Attorney-Client	Email between General Counsel's Office and Public Records regarding outstanding requests.	8/29/2022 7:41 AM	Public Records requests currently open as of August 29, 2022	Gavins, Alexandra	Smoak, Kimberly;Wallace, Thomas J.	George, Tracy;Templeton, Mary Gay;Sokoloski, Kristin
564	AHCA0277155	Excel	Attorney-Client	Notes and request tracker.	12/31/9999 7:00 PM				
565	AHCA0277156	Excel	Attorney-Client	Notes and request tracker.	12/31/9999 7:00 PM				
566	AHCA0277157	Excel	Attorney-Client	Notes and request tracker.	12/31/9999 7:00 PM				
567	AHCA0277158	Excel	Attorney-Client	Notes and request tracker.	12/31/9999 7:00 PM				
568	AHCA0285275-AHCA0285276	Pdf	Work-Product	Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/2/2022 2:43 PM	PRIVILEGED & CONFIDENTIAL - Section 119.071(1)(d)1. F.S.	Gary V. Perko	""Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	Gary V. Perko
569	AHCA0285277-AHCA0285279	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	12/31/9999 7:00 PM				
570	AHCA0285280-AHCA0285283	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	12/31/9999 7:00 PM				
571	AHCA0285285-AHCA0285286	Pdf	Work-Product	Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/2/2022 3:24 PM	FW: PRIVILEGED & CONFIDENTIAL - Section 119.071(1)(d)1. F.S.	Sheeran, Andrew	""Weida"" , "" Jason;" "George"" , "" Tracy;<Jason.Weida@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
572	AHCA0285287-AHCA0285289	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	12/31/9999 7:00 PM				
573	AHCA0285290-AHCA0285293	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	12/31/9999 7:00 PM				
574	AHCA0285295-AHCA0285296	Pdf	Work-Product	Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/2/2022 4:03 PM	RE: PRIVILEGED & CONFIDENTIAL - Section 119.071(1)(d)1. F.S.	Weida, Jason	""Sheeran"" , "" Andrew;" "George"" , "" Tracy;<Andrew.Sheeran@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
575	AHCA0295177	Pdf	Work-Product	Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/7/2022 11:42 AM	PRIVILEGED & CONFIDENTIAL	Weida, Jason	<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;" "Sheeran"" , "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
576	AHCA0295178-AHCA0295262	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	12/31/9999 7:00 PM				
577	AHCA0295263-AHCA0295264	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	12/31/9999 7:00 PM				
578	AHCA0295265	Pdf	Work-Product	Email between AHCA General Counsel's Office and EOG General Counsel's Office regarding lawsuit.	9/7/2022 11:45 AM	Fwd: PRIVILEGED & CONFIDENTIAL	Sheeran, Andrew	<Maureen.furino@eog.myflorida.com>	
579	AHCA0295266-AHCA0295350	Pdf	Work-Product	Attachment to Email between AHCA General Counsel's Office and EOG General Counsel's Office regarding lawsuit.	12/31/9999 7:00 PM				
580	AHCA0295351-AHCA0295352	Pdf	Work-Product	Attachment to Email between AHCA General Counsel's Office and EOG General Counsel's Office regarding lawsuit.	12/31/9999 7:00 PM				
581	AHCA0295353	Pdf	Work-Product	Email between AHCA General Counsel and Secretary regarding ongoing litigation.	9/7/2022 11:59 AM	Fwd: PRIVILEGED & CONFIDENTIAL	Sheeran, Andrew	Marstillier, Simone;Wallace, Thomas J.;Farrill, Cody	Weida, Jason

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582	AHCA0295354- AHCA0295438	Pdf	Work-Product	Attachment to email between AHCA General Counsel and Secretary regarding ongoing litigation.	12/31/9999 7:00 PM				
583	AHCA0295439- AHCA0295440	Pdf	Work-Product	Attachment to email between AHCA General Counsel and Secretary regarding ongoing litigation.	12/31/9999 7:00 PM				
584		Img	Work-Product	Text message between Jason Weida and EOG General Counsel's Office regarding expert reports for ongoing litigation.	5/16/2023 15:59		Weida, Jason	Furino, Maureen	

From: Cogle, Christopher
Subject: Re: GAPMS process
To: "Eng sh"; Jeffrey; Jeffrey.Eng sh@ahca.myflorida.com
Sent: June 27, 2022 2:52 PM (UTC-04:00)

Thank you.

And thank you for standing up for the true credibility of the GAPMS process.

I will read the SOP attachment you sent and think about it more.

Your dedication and work are appreciated.

Chris

Christopher R. Cogle, M.D.

Chief Medical Officer for Florida Medicaid

2727 Mahan Drive
Bldg 3 Room 2421-A MS8
Tallahassee, FL 32308
Mobile: (850) 228-2868

From: English, Jeffrey <Jeffrey.English@ahca.myflorida.com>
Sent: Monday, June 27, 2022 2:30:05 PM
To: Cogle, Christopher <Christopher.Cogle@ahca.myflorida.com>
Subject: RE: GAPMS process

Good afternoon, Dr. Cogle,

There is a SOP for GAPMS.

Typically, the requests for consideration of coverage come in either through a health service research email address or from leadership (less often).

The GAPMS process exists to determine whether the service/device requested for coverage is "experimental/investigational" or "medically necessary".

The request gets run through the attached checklist, and once it is determined to be an actual GAPMS (rather than a decision point or "simple" coverage determination) I reach out to the requestor and schedule a time to gently walk them thru the process.

We ask that the requestor(s) send us a host of information, much of which is included on the checklist. They often send us published research about the service/device under consideration, relevant national or local coverage determination information, and as many examples as they have of coverage by other states or major insurers. The amount of information provided by the requestors can vary quite a bit in quality and completeness.

Their request is added to our GAPMS queue to be worked on, typically in the order in which they have been received. We do tend to reward requestors who maintain contact, provide updates, and respond in a timely manner to any inquiries we might have.

Assuming they check off all the boxes on the checklist, so to speak, we begin the process.

- I determine what similar services or alternative treatments we already cover. I verify that the service/device requested has FDA approval and a dedicated billing code.
- I utilize Policy Reporter to determine which states currently include the service/device on their respective fee schedules. I also research and verify any existing coverage among the major insurance companies. I look for any existing national or local coverage determinations.
- The greatest amount of time is spent researching the existing professional literature on the subject, ideally well designed, non-industry sponsored studies, in peer-reviewed journals. Systematic reviews and meta-analyses, when existing, play a big role and can often provide a heads up regarding the quality of the literature as well as any gaps that may exist. The quality can of course vary considerably depending on the item in question and how long it has existed as a treatment option. I also look for any existing clinical guidelines that might exist related to the request, as well as consulting various sites like AHRQ, Cochrane, NICE, etc. What do they have to say about it? Also, are there any ongoing trials identifiable through clinicaltrials.gov that might shed more substantial light on the matter at a future date?
- I also pull any relevant articles pertaining to cost analyses that might indicate potential for cost saving for Florida Medicaid.
- Assuming (and for some of these that is a big "If") they check all the right boxes on all of the above, I will submit a request to MPF, along with a minimum of three price examples from other states that currently provide coverage, for a cost analysis. Anything added (with some exceptions) to the fee schedule must be budget neutral. So, we ask, what do we already pay for, can this new service/device offset any existing coverage, and does it lead to healthier outcomes at similar or less cost?

Once everything has been received, researched, and reviewed, I prepare a report that is roughly a template insofar as it is divided into sections ranging from "literature" to "existing coverage among other states" etc. Once the report has been completed, it goes to my immediate supervisor who reviews it for content and then forwards it to the Bureau Chief. Usually there would be a meeting with her, questions asked and answered, and then the report moves on to Tom for his signature, yay or nay, as final approval. Then the requestor is contacted and given a final copy of the report. If it is determined medically necessary and budget neutral, the code is then added to the fee schedule based on the normal fee schedule update timeline.

All of that is the ideal. The reality is that the reviews get done, the reports get written, and then they all bottleneck with leadership because GAPMS are fairly low on the totem pole of priorities, particularly since the pandemic began. It is also extremely common for a request to come in (most of them, really) that are asking for coverage long before the necessary information exists to justify coverage. Manufacturers will have a newfangled device with a tiny evidence base or will make the request before their most significant and enlightening trials/studies have even been completed. I have often said that a lot of what I am asked to look at will likely eventually gain coverage. But it is common for the request to outpace the evidence, and they are often several years away from finalizing their best case.

I believe there are currently about seven completed that are still awaiting review and approval from leadership. Some of them have been written for over two years. I have re-reviewed them and made any necessary updates concerning coverage, research, etc. I typically do that twice a year.

Of course, the requestors are always free to resubmit after a denial, so some of these never really die. But the resubmissions go to the back of the queue and are taken in the order they arrive.

If you will excuse me, I feel obligated to include this information: I was not informed or consulted, did not in any way participate, and did not write the GAPMS concerning gender dysphoria treatment. That particular GAPMS did not come through the traditional channels and was not handled through the traditional GAPMS process. Every report I have written represents my best effort at determining the most timely and accurate information available on the subject under consideration. I do not cherry pick data or studies and would never agree to if I were so asked. All I can say about that report, as I have read it, is that it does not present an honest and accurate assessment of the status of the current evidence and practice guidelines as I understand them to be in the existing literature. I sincerely apologize if I come across as a bit agitated about it, but as the "GAPMS guy" around here, lots of assumptions have been made by those

who do not know me well. I'm a different sort of person than the author of that report. I can't speak for them. I conduct myself and my work with integrity and I do not play favorites, yay or nay. Full stop, period.

Thanks so much for your help Friday. That shaved a few minutes off a tight deadline for me. Please let me know if you have any additional questions or would like any additional information or clarification.

Take care.

Jeff

From: Cogle, Christopher <Christopher.Cogle@ahca.myflorida.com>
Sent: Saturday, June 25, 2022 9:13 PM
To: English, Jeffrey <Jeffrey.English@ahca.myflorida.com>
Subject: GAPMS process

Hello, Jeff. Good talking with you this past Friday.

Are there standard operating procedures for GAPMS?

If so, can I review them?

If no SOPs, then can I help you develop a SOP for GAPMS?

Thank you,

Chris

Christopher R. Cogle, M.D.

Chief Medical Officer for Florida Medicaid



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RICK SCOTT
GOVERNOR

ELIZABETH DUDEK
SECRETARY

**PUBERTY SUPPRESSION THERAPY
GENERALLY ACCEPTED PROFESSIONAL MEDICAL STANDARDS (GAPMS)
DETERMINATION REPORT WITH RECOMMENDATION**

Date: September 14, 2016
To: Justin Senior, Deputy Secretary for Medicaid
From: Bureau of Medicaid Policy
Subject: Puberty Suppression Therapy

PURPOSE

In order for the use of puberty suppression therapy to be covered under the Florida Medicaid program, it must meet medical necessity criteria as defined in Rule 59G-1.010, Florida Administrative Code (F.A.C.), and be funded through the General Appropriations Act of Chapter 216, Florida Statutes (F.S.).

Pursuant to the criteria set forth in Rule 59G-1.010, F.A.C., the use of puberty suppression therapy must be consistent with generally accepted professional medical standards (GAPMS) as determined by the Medicaid program, and not experimental or investigational.

In accordance with the determination process established in Rule 59G-1.035, F.A.C., the Deputy Secretary for Medicaid will make the final determination as to whether the use of puberty suppression therapy is consistent with generally accepted professional medical standards and not experimental or investigational.

If it is determined that puberty suppression therapy is consistent with generally accepted professional medical standards, this report will be supplemented with an addendum which analyzes additional factors to determine whether this health service should be covered under the Florida Medicaid program.

REPORT WITH RECOMMENDATION

This report with recommendation is presented as the summary assessment considering the factors identified in Rule 59G-1.035, F.A.C., based on the collection of information from credible sources of reliable evidence-based information. The intent is to provide a brief analysis with justification in support of the final recommendation.

The analysis described in this report includes:

- A high level review of relevant disease processes.
- An overview of the health service information.
- Clearance from the government regulatory body (e.g., Food and Drug Administration).



- Evidence based clinical practice guidelines.
- A review of the literature considered by the relevant medical community or practitioner specialty associations from credible scientific evidence-based literature published in peer reviewed journals and consensus of coverage policy from commercial and other state Medicaid insurers.

HEALTH SERVICE SUMMARY

Hormones

Hormones are important chemical messengers in the body that effectively transfer signals and instructions from one set of cells to another. Hormones are secreted into the bloodstream by a collection of glands inside the body referred to as the endocrine system. A gland is a group of cells that produces and secretes chemicals into the body. The major glands that make up the endocrine system include the hypothalamus, pituitary gland, thyroid and parathyroid, adrenals, pineal body, and the ovaries and testes.

In a laboratory setting, hormones are produced synthetically and are prescribed by physicians to treat disease or hormone deficiencies. An instance where synthetic hormones may be needed is when an individual has their thyroid gland surgically removed; a practitioner may prescribe synthetic thyroid hormones to replace those that their body can no longer produce.

Over 50 different hormones have been identified in the human body, and more are still being discovered. Hormones influence and regulate practically every cell, tissue, organ, and function of the body, including growth, development, metabolism, homeostasis, and sexual and reproductive function.²⁰

Reproductive Hormones

The hormones commonly considered as reproductive hormones in the body are testosterone, estrogen, and progesterone. Testosterone is often referred to as a male hormone, and estrogen and progesterone are often referred to as female hormones. However, there are no exclusively male or female hormones that have been identified. The physical manifestations of gender result from differences in the amounts of individual hormones in the body and differences in their patterns of secretion, first in utero and then again during puberty. In other words, testosterone, estrogen, and progesterone are produced by men and women, but in differing amounts and in different patterns.²⁰

Reproductive Hormone Suppression Therapy

There are many disease processes in which increased levels of reproductive hormones are released. They include, but are not limited to, prostate cancer, breast cancer, severe endometriosis, and central precocious puberty. To address the over-secretion of reproductive hormones, several drugs have been developed to aid in reducing hormone levels, including those hormones released during puberty.

For the purposes of this report, an analysis is being performed on the use of hormone treatment to suppress puberty. Currently, there are a number of drugs used to suppress puberty, which all use gonadotropin-releasing hormone (GnRH) agonists. Agonists function to stop receptors from connecting with the appropriate transmitter. For a hormone to perform its primary function in the

brain and body it must find the correct receptor to transmit its response; the GnRH agonists prevent this natural cycle.²⁰

Government Regulatory Body Approval

The Food and Drug Administration (FDA) has approved three drugs for the use in children for the purpose of puberty suppression therapy, as follows:

- Lupron⁴⁴
 - Indications for use: Palliative treatment of advanced prostatic cancer and central precocious puberty in children of both sexes.
- Synarel⁴⁷
 - Indications for use: Central precocious puberty (gonadotropin-dependent precocious puberty) in children of both sexes and endometriosis.
- Supprelin⁴⁶
 - Indications for use: Central precocious puberty in both sexes.

Each of these drugs has specific indications for use and dosing information. Additionally, these medications have approved off-label uses. This permits usage in other than the approved FDA indications. These approved off-label uses are compiled in three compendia: American Hospital Formulary Service Drug Information (AHFS), United States Pharmacopeia-Drug Information (or its successor publications), and DRUGDEX Information System.⁷ The drugs specified above are authorized in the respective compendia to treat the following conditions:

- Lupron:
 - Breast cancer
 - In vitro fertilization
 - Ovarian cancer
 - Premenstrual syndrome
 - Prostate cancer
 - Prostate cancer, Neoadjuvant treatment
 - Uterine leiomyoma
- Synarel:
 - Benign prostatic hyperplasia
 - Contraception, Female; prophylaxis
 - Contraception, Male; prophylaxis
 - Crohn's disease
 - Hirsutism
 - In vitro fertilization
 - Uterine leiomyoma
- Supprelin:
 - Acute intermittent porphyria
 - Endometriosis
 - Female infertility; Adjunct
 - Polycystic ovary syndrome
 - Uterine leiomyoma

While all of these drugs may be utilized to treat other conditions, as indicated above and specified in the compendia, none of them are authorized or specified in the compendia for use in treating individuals diagnosed with gender dysphoria.⁷

LITERATURE REVIEW

This analysis summarizes information obtained from scientific literature published in credible peer-reviewed journals related to the use of puberty suppression therapy. This section also briefly cites the positions from the relevant medical societies, and summarizes the key articles referenced in support of their positions.

Central Precocious Puberty

Central precocious puberty (CPP) develops due to premature pubertal changes and rapid bone development. CPP is associated with lower adult height and increased risk for development of psychological problems.

Reproductive hormone suppression therapy (also referred to as puberty suppression therapy in this document) has been the standard of care for CPP for the last 15-20 years. The standard treatment for CPP is GnRH analogs. Although there are many different analogs with different routes of administration, the primary agent in the United States for many years was depot intramuscular injections administered every four weeks, but in the last ten years, a subdermal or under the skin implant has been developed, which has been shown to be effective for up to two years.^{17, 39, 41}

In a recent study, researchers explored the difference in cognitive function, behavior, emotional reactivity, and psychosocial problems between young females treated with GnRH and age-matched controls. They concluded that young females treated with GnRH do not differ in their cognitive functioning, behavioral, and social problems from their same age peers. However, they did find a significant difference in heart rate that increased with treatment duration and suggested a follow-up study with an emphasis on cardiac health.⁵⁵

Gender Dysphoria

Gender dysphoria is an individual's affective or cognitive discontent with their assigned gender (gender at birth).¹⁴ Gender dysphoria refers to the distress that may accompany the incongruence between the individual's experienced or expressed gender and their assigned gender. Evidence of this distress is the hallmark of the disorder. The diagnostic criteria are divided into a category for children and a category for adolescents and adults. The disorder is manifested differently as an individual ages or enters different developmental stages. Both categories require marked incongruence between the individual's experienced or expressed gender and their assigned gender of at least a six months' duration and clinically significant distress or impairment in social, school (occupation for adults), or other important areas of functioning.¹⁴

Diagnostic criteria in children include: a strong desire to be the other gender or an insistence that they are the other gender; a preference for wearing clothing associated with the other gender; preference for cross gender roles in simulated play; preference for toys games, or activities usually associated with the other gender; preference for playmates of the other gender; and the dislike of their sexual anatomy. The prevalence of this diagnosis among the general population ranges from 0.005% to 0.014% in males and 0.002% to 0.003% in females.¹⁴

Studies have shown that the majority of children (80%) diagnosed with gender dysphoria will not continue to be gender dysphoric after puberty.³¹

In adolescents and adults, diagnostic criteria include: a strong desire to be and to be treated as the other gender and a strong desire to have the sex characteristics of the other gender (or in the case of adolescents, the wish to prevent the development of their assigned gender's characteristics).¹⁴

Gender dysphoria is associated with high levels of stigmatization, discrimination, and victimization, leading to negative self-concept, increased rates of mental disorder comorbidity, school dropout, and economic marginalization.¹⁴ Adolescents that do not receive treatment during this already vulnerable period of development might engage in risky or self-harming behaviors, such as self-harm, self-mutilation, suicidal ideation, or suicide.²²

For the 20% of children who persist in their feelings of gender dysphoria, clinicians may begin to explore alternative treatment approaches beyond psychotherapy after the onset of puberty, including medical interventions such as the use of GnRH analogs to suppress puberty.³⁸ The use of puberty suppression therapy is used as a diagnostic aid in adolescents contending with gender dysphoria.^{6, 10, 11, 24, 31, 50} The use of GnRH analogs is generally prescribed in adolescents ages 12-16. In addition to puberty suppression therapy, a physician may also begin to prescribe cross-sex hormones, though the latter does not generally begin until the ages of 16-18.^{10, 11}

The use of GnRH analogs will delay reproductive development in this population. However, there remains a great deal of concern and lack of consensus in the medical community of the potential risks, including: misdiagnosis, sterilization, adverse medical effect on the metabolic and endocrine system, impaired bone mass and brain development, etc.^{51, 6} To date, there have been no randomized controlled clinical trials on the use of GnRH analogs in the treatment of gender dysphoria (on large cohorts) that have been shown to be efficacious with tolerable side effects. This is in large part due to the small number of patients diagnosed with gender dysphoria, which makes any statement on the general efficacy of a treatment approach challenging.³¹ However, there have been case-studies (qualitative) that have been conducted that review the outcomes on small cohorts. These studies have concluded that there are limited negative side effects from the use of puberty suppression drugs in adolescents contending with gender dysphoria.^{54, 55}

Clinicians who support the use of puberty suppression therapy in the treatment of gender dysphoria argue that the risks of misdiagnosis are significantly reduced if the treatment is delayed until the initiation of puberty. They also contend that this treatment may relieve emotional distress in the individual (including reducing suicidal ideation in severe cases) and may "buy time" for the child to explore their feelings of gender dysphoria without contending with physical changes that cannot be undone (e.g., breast development).²² Most treatment protocols recommend extensive psychological evaluations/assessments and psychotherapy by mental health professionals prior to the initiation of medical interventions. This is especially important given the changing thoughts and feelings of prepubescent children versus adolescents with persistent gender dysphoria and in adolescents presenting with co-morbid conditions.

It is important to note that most of the literature reviewed in development of this analysis concluded that more systematic research is required to determine the long-term efficacy of medical treatment for adolescents with gender dysphoria.^{21, 24, 25, 28, 50, 51}

Evidence-Based Clinical Practice Guidelines

The American Academy of Pediatrics published a consensus statement on the use of GnRH analogs in children in March 2009. They concluded that GnRH use was undisputed in the treatment of CPP early-onset (less than six years old). However, the use of GnRH for conditions other than CPP requires additional investigation and cannot be suggested routinely.³ The consensus statement does not specifically address the use of GnRH in the treatment of gender dysphoria.

The Endocrine Society published guidelines for the endocrine treatment of transsexual persons. The Society concluded that transsexual persons seeking to develop the physical characteristics of the desired gender require safe, effective hormone regimen that will 1) suppress endogenous hormone secretion determined by the person's genetic/biological sex and 2) maintain sex hormone levels within the normal range for the person's desired gender. They recommend that a mental health professional make the referral and participate in ongoing care and an endocrinologist must confirm the diagnostic criteria. They do not recommend endocrine treatment of prepubertal children. The recommendations are as follows:

- Treatment of transsexual adolescents (Tanner stage two, generally achieved around the age of 12 years) by suppressing puberty with GnRH analogues until the age of 16 years.
- Initiation of cross-sex hormones at the age of 16 years with continued suppression of biological sex hormones.
- Maintaining physiologic levels of gender-appropriate sex hormones and monitoring for known risks throughout adulthood.^{19, 18, 32}

In making these recommendations, however, the Endocrine Society identified the strength of the evidence used to support its conclusions. For all of the recommendations listed above, the Society acknowledged the strength of the evidence as low or very low.

COVERAGE POLICY

Federal Regulations

Federal regulations for Medicaid specify that a state may limit coverage of a drug with respect to the treatment of a specific disease or condition for an identified population (if any) based on the drug's labeling, if it does not have a significant, clinically meaningful therapeutic advantage in terms of safety, effectiveness, or clinical outcome of such treatment for such population over other drugs included in the formulary. In addition, states may exclude a drug when the prescribed use of the drug is not for a medically accepted indication, either approved by the FDA or supported by information from the appropriate compendia. These guidelines apply to a state's administration of its Medicaid prescribed drug benefit in both managed care and non-managed care delivery systems.

States are also required to implement a drug use review program for covered outpatient drugs in order to assure that prescriptions are appropriate, medically necessary, and are not likely to result in adverse medical results. The program is required to assess data on drug use against predetermined standards, consistent with the following:

1. Compendia, consisting of the following:
 - a. American Hospital Formulary Service Drug Information;
 - b. United States Pharmacopeia-Drug Information (or its successor publications); and
 - c. the DRUGDEX Information System; and
2. The peer-reviewed medical literature.

Federal law requires states to provide services to eligible recipients under the age of 21 years, if such services are medically necessary to correct or ameliorate a defect, a condition, or a physical or mental illness. This is known as the Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) benefit. Included are diagnostic services, treatment, equipment, supplies, and other measures described in section 1905(a) of the Social Security Act, codified in Title 42 of the United States Code 1396d (a). As such, services for recipients under the age of 21 years exceeding any coverage limitations specified within a state's policies maybe approved, if medically necessary.

Florida Medicaid

In order to be reimbursed by Florida Medicaid, a drug must be medically necessary and either (a) prescribed for medically accepted indications and dosages found in the drug labeling or drug compendia in accordance with section 1927(k) (6) of the Social Security Act, or (b) prior authorized by a qualified clinical specialist approved by the Agency for Health Care Administration (Agency).¹

The criteria that are utilized under the Florida Medicaid program in the authorization of drugs for off-label purposes are as follows:

1. Documentation submitted with trial and failure or intolerance to all FDA- approved medications for the indication **AND**
2. Phase III clinical studies published in peer review journals to support the non-FDA approved use **AND**
3. Usage supported by publications in peer reviewed medical literature **and** one or more citations in at least one of the following compendia:
 - a. American Hospital Formulary Service Drug Information (AHFS)
 - b. United States Pharmacopeia-Drug Information (or its successor publications)
 - c. DRUGDEX Information System¹

Florida Medicaid covers reproductive hormone suppression therapy (including puberty suppression therapy) for all FDA approved indications/uses or when the information in the appropriate compendium supports the use of the drug in the treatment of the specific disease state or condition. Since the use of GnRH agonists are not FDA approved or listed in the appropriate compendia for the treatment of gender dysphoria, Florida Medicaid does not authorize these drugs for such uses. However, children/adolescents diagnosed with gender dysphoria are eligible to receive an array of other medical and behavioral health interventions (e.g., individual and family therapy, psychological evaluations/assessments, other medical evaluation and management services) necessary to address their presenting signs and symptoms.

Health plans contracted to provide services under the Florida Medicaid Statewide Medicaid Managed Care program are required to cover all prescription drugs listed in the Agency's Medicaid Preferred Drug List (PDL). In addition, the health plan's prior authorization criteria and protocols may not be more restrictive than those used by the Agency as indicated in the Florida Statutes, the Florida Administrative Code, the Medicaid State Plan and those posted on the Agency website.

Florida Medicaid provides services to eligible recipients under the age of 21 years, if such services are medically necessary to correct or ameliorate a defect, a condition, or a physical or mental illness. Medical necessity in the State of Florida must meet the following conditions:

1. Be necessary to protect life, to prevent significant illness or significant disability, or to alleviate severe pain;
2. Be individualized, specific, and consistent with symptoms or confirmed diagnosis of the illness or injury under treatment, and not in excess of the patient's needs;
3. Be consistent with generally accepted professional medical standards as determined by the Medicaid program, and not experimental or investigational;
4. Be reflective of the level of service that can be safely furnished, and for which no equally effective and more conservative or less costly treatment is available statewide; and
5. Be furnished in a manner not primarily intended for the convenience of the recipient, the recipient's caretaker, or the provider.

If a service exceeds the coverage described within a Florida Medicaid policy or the associated fee schedule, a request (along with all supporting documentation) may be submitted to the Agency or its designee for review.

Medicare

Medicare covers reproductive hormone suppression for all FDA approved use. The *Medicare Benefit Policy Manual*, Chapter 15, page 15, subsection 50.4.2, discusses the unlabeled use of a drug. The policy states that "FDA approved drugs used for indications other than what is indicated on the official label may be covered under Medicare if the carrier determines the use to be medically accepted, taking into consideration the major drug compendia, authoritative medical literature and/or accepted standards of medical practice."⁵ However, because Medicare covers primarily elderly adults and disabled adults, its coverage policies have little or no application in this analysis.

State Medicaid Programs

All state Medicaid programs cover reproductive hormone suppression therapy for the approved FDA indications and when the criteria for off-label use are met. Some state Medicaid programs are also adopting coverage policies that allow for reimbursements of puberty suppression therapy in adolescents diagnosed with gender dysphoria. It appears at this time as though most states do not cover this service although that may change over time. This report highlights the coverage policies for four Medicaid programs that do cover the service, as follows:

1. Colorado Medicaid covers behavioral health services, GnRH analogs/agonists, cross-sex hormone therapy, gender confirmation surgery, and pre and post-operative care.
2. Maryland Medicaid covers GnRH treatment if the recipient has a diagnosis of gender dysphoria.
3. Rhode Island Medicaid covers behavioral health services, pharmacological and hormonal therapy to delay physical changes of puberty, and pharmacological and hormonal therapy that is non-reversible and produces masculinization or feminization. Some services require prior authorization.
4. Washington State Medicaid covers behavioral health services, puberty suppression therapy, hormonal therapy, and gender reassignment surgery.

GENERALLY ACCEPTED PROFESSIONAL MEDICAL STANDARDS RECOMMENDATION

Puberty suppression therapy is considered a health service that is consistent with generally accepted professional medical standards for the approved FDA indications (i.e., central precocious puberty) and for off-label use when supported by citations in at least one of the compendia. Since Florida Medicaid already provides coverage of puberty suppression therapy in the treatment of central precocious puberty and for use in treating the conditions cited in the compendia, no further policy coverage analyses are needed to supplement this report on this point.

Based upon the available published literature, it is inconclusive whether puberty suppression therapy is considered a health service that is consistent with generally accepted professional medical standards in the treatment of gender dysphoria. Most of the studies published thus far on the use of puberty suppression in gender dysphoric children/adolescents have concluded that further systematic research is required to determine the long-term safety and efficacy of this approach and there remains a lack of consensus within the medical community on its appropriateness (both from an ethical and safety perspective). As the research on this topic continues to evolve, more conclusive evidence may emerge that supports the long-term efficacy and effectiveness of this treatment approach. At any time, a follow-up analysis can be performed that could change this recommendation.

EPSDT Considerations:

While the Agency cannot make a blanket determination on puberty suppression therapy for gender dysphoria, we also cannot categorically exclude this treatment for children. Clinical guidelines from the Endocrine Society do recommend this therapy for certain adolescents, albeit based upon a combination of weak and very weak evidence. In certain circumstances, the risks of not treating an adolescent may be worse than the potential long-term consequences of treatment. Moreover, it is noted extensively in the literature that adolescents contending with gender dysphoria often experience a myriad of emotional, physical, and societal challenges. Unresolved, the distress can manifest into a host of behavioral health problems including depression, anxiety, and suicidal ideation and self-mutilation. Florida pays for services for children when they protect life and /or prevent significant disability or harm, in accordance with the state's medical necessity definition.

Given these concerns, while it is not recommended that any further analyses be conducted to expand Florida Medicaid's coverage of puberty suppression therapy beyond those indications/uses approved by the FDA or authorized in the appropriate compendium, it is recommended that any individualized request for such therapy be reviewed as a part of the Agency's special services process. Consistent with EPSDT requirements, the request can be evaluated on an individualized basis to determine if the service is medically necessary (e.g. it is administered to protect life and/or prevent significant disability, such as to prevent suicide or self-mutilation) to ensure that all less invasive interventions have been exhausted, and to ensure that this treatment approach presents as the best alternative given the adolescent's psychological state and presenting signs and symptoms.

Concur

Do not Concur

Comments:

[Handwritten Signature]
Deputy Secretary for Medicaid (or designee)

9/15/16^{FK}
Date