

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

CHIANNE D., *et al.*,

Plaintiffs,

Case No. 3:23-cv-00985-MMH-LLL

v.

SHEVAUN HARRIS, in her official
capacity as Secretary for the Florida
Agency for Health Care Administration,
and TAYLOR HATCH, in her official
capacity as Secretary for the Florida
Department of Children and Families,

Defendants.

DEFENDANTS' NOTICE OF COMPLIANCE

In its Findings of Fact & Conclusions of Law (ECF No. 186) (the "Order"), this Court directed Defendants, by March 17, 2026, to file a notice on the docket advising the Court of their compliance with the Order. ECF No. 186 at 273.

The Order enjoined Defendants from terminating the family-related Medicaid benefits of any class member based on a finding of financial ineligibility unless the State provides written notice in compliance with the Order. *Id.* at 271. Defendants have complied with this provision of the Order. Promptly upon issuance of the Order, the Department of Children and Families and its IT vendor, Deloitte, evaluated and then performed the IT work necessary to modify the FLORIDA system to discontinue terminations of family-related Medicaid benefits on a finding of financial ineligibility.

These modifications were completed by February 20 and took effect on February 23, 2026.

The Order also enjoined Defendants, by March 9, 2026, to provide a corrective notice to any class members whose family-related Medicaid benefits were terminated during the class period and have not been reinstated or, by March 17, 2026, to reinstate such class members to full Medicaid until the State provides the corrective notice required by the Order. *Id.* at 272–73. On February 23, 2026, this Court extended the March 9, 2026, and March 17, 2026, deadlines to April 3, 2026, and April 7, 2026, respectively. ECF No. 195 at 4. Thus, compliance with this provision of the Order is not yet due and will not be due before the deadline to file this notice of compliance. *See* ECF No. 186 at 273. Nevertheless, DCF and Deloitte have been diligently engaged on the IT work required by the corrective-notice requirement. As stated in Defendants’ Motion to Stay Pending Appeal and Alternative Motion for Extension of Time and Clarification, the development and mailing of corrective notices to more than 1 million class members is a large undertaking that Defendants are working to complete as soon as possible, but that Defendants estimate will take nearly until the end of April. ECF No. 193 at 9–10.

Respectfully submitted,

/s/ Andy Bardos

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