

**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

Defendants respectfully file this notice of compliance as directed by the Court.

See ECF No. 198 at 18.

In its Findings of Fact & Conclusions of Law, this Court ordered Defendants, by March 9, 2026, to provide all class members whose family-related Medicaid benefits were terminated and not reinstated during the class period with notice of the Court's ruling and a constitutionally adequate termination notice compliant with the Court's Order. ECF No. 186 at 272. The Court also ordered Defendants, by March 17, 2026, to reinstate to full Medicaid any class member who, under the Court's Order, is entitled to a corrective notice, but to whom Defendants do not provide a corrective notice by March 9, 2026. *Id.* at 273.

The Court later extended the deadlines to provide corrective notice to May 1, 2026, and to reinstate benefits absent corrective notice to May 8, 2026. ECF No. 195 at 4; ECF No. 198 at 17. The Court ordered Defendants, by May 8, 2026, to file a notice advising the Court of their compliance with these directives. ECF No. 198 at 18.

Defendants complied with these requirements. By May 1, 2026, Defendants sent corrective notices to all class members whose family-related Medicaid benefits, according to data maintained by the Department of Children and Families (“DCF”), were terminated due to income and not reinstated during the class period. As directed by the Court, by August 3, 2026, Defendants will file their first status report on DCF’s progress in conducting fair hearings in response to the corrective notices. ECF No. 198 at 17–18.

In the meantime, DCF and its IT vendor, Deloitte Consulting, will apply their resources to the development of notices compliant with the Court’s instructions for use in connection with future income-based terminations of class members’ family-related Medicaid benefits. Effective February 23, 2026, the State suspended all income-based terminations of family-related Medicaid benefits pending implementation of the new notices. ECF No. 197 at 1–2.

Respectfully submitted,

/s/ Andy Bardos

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