



STATE OF FLORIDA
AGENCY FOR HEALTH CARE ADMINISTRATION
OFFICE OF FAIR HEARINGS

FILED

Jan 25, 2024, 8:41 am

OFFICE OF FAIR HEARINGS

AHCA Case No.: 23-FH2566

[REDACTED],

PETITIONER,

vs.

AGENCY FOR HEALTH CARE
ADMINISTRATION,

RESPONDENT.

_____ /

FINAL ORDER

Pursuant to notice, the undersigned convened a telephonic Fair Hearing on the instant case on December 12, 2023, at 1:02 p.m. Eastern Standard Time (“EST”).

APPEARANCES

For the Petitioner:

[REDACTED]

Petitioner’s Authorized Representative

For the Respondent:

Marielisa Amador
Medical/Health Care Program Analyst
Agency for Health Care Administration

STATEMENT OF ISSUE

The issue is whether Respondent proved by a preponderance of the evidence that Respondent’s decision to terminate Petitioner’s Behavior Analysis (“BA” or “ABA”) services was correct.

PRELIMINARY STATEMENT

All parties and witnesses appeared telephonically. Petitioner’s Authorized Representative and [REDACTED], [REDACTED] (“[REDACTED]”), appeared on behalf of Petitioner. The following

attended as witnesses for Petitioner: [REDACTED] (“[REDACTED]”), Board Certified Behavior Analyst (“BCBA”), and [REDACTED] (“[REDACTED]”), Board Certified Behavior Analyst.

Marielisa Amador (“Ms. Amador”), Medical/Health Care Program Analyst for the Agency for Health Care Administration (“Agency” or “AHCA”), appeared on behalf of Respondent. Dr. Melissa Switzer (“Dr. Switzer”), Board Certified Behavior Analyst and Second Level Reviewer for eQHealth Solutions Inc. (“eQHealth”), appeared as a witness for Respondent.

Petitioner did not introduce any exhibits at the hearing. Prior to the hearing, Respondent sent to the Office of Fair Hearings and Petitioner a two-hundred and twenty-two (222)-page evidence packet and a forty-nine (49)-page evidence packet. The two-hundred and twenty-two (222)-page evidence packet appears in the Office of Fair Hearings’ document management system as the file titles “[REDACTED] FH 12.12.2023 1-192.pdf” and “[REDACTED] FH 12.12.2023 193-222.pdf”. The forty-nine (49)-page evidence packet appears in the Office of Fair Hearings’ document management system as the file title “23-FH2566 AHCA Evidence (Pages 1-49 of 49).pdf”. Absent an objection from the Petitioner, the undersigned admitted the two-hundred and twenty-two (222)-page evidence packet into evidence as Respondent’s Composite Exhibit 1 (“RCE 1”) and the forty-nine (49)-page evidence packet into evidence as Respondent’s Composite Exhibit 2 (“RCE 2”).

FINDINGS OF FACT

1. Petitioner receives Medicaid services on a fee-for-service basis from the Agency. eQHealth is a Quality Improvement Organization contracted by the Agency to review prior authorization requests for services. See page 2 of RCE 2.

2. Petitioner is [REDACTED]. See page 16 of RCE 1. Petitioner is diagnosed with [REDACTED]. *Id.*

3. In the Petitioner’s Behavior Analysis Assessment (“treatment plan” or “behavior plan”) it was reported that Petitioner is engaging in the following maladaptive behaviors: [REDACTED]; [REDACTED]; [REDACTED]; and [REDACTED]. *Id.* at 89 -100.

4. Petitioner requested continuation of BA services; specifically, 3,120 units of code 97153; 1,352 units of code 97155; and 208 units of code 97156. In a Notice of Outcome (“NOO”), dated September 27, 2023, Respondent terminated Petitioner’s ABA services. *Id.* at 22. The NOO explained the basis for the termination as follows:

[T]he requested services are not medically necessary under the following standard(s):

Consistent with generally accepted professional medical standards as determined by the Medicaid program, and not experimental or investigational.

The NOO further provided:

PR Clinical Rationale – Denial: According to the Florida Medicaid State Plan (Appendix 9.3.b), the data provided must show evidence that the frequency of the maladaptive behavior(s) has decreased since the last review and, if not, that there is a modification of the behavior plan. The recommendations for procedural modifications include: additions/changes to treatment plan to impact behaviors targeted for reduction. Procedural modifications should include one or more of the following: antecedent manipulation modifications, modifications of prompting procedures used in acquisition, modifications in consequence-based strategies- - ones that either reduce maladaptive behavior or reinforce replacement behavior (e.g., manipulation of reinforcement schedules, switch to a different decelerative procedure), or if lack of progress was due to therapist error (e.g., poor data collection or poor training on intervention methods), how you will address human error. The provider has not addressed the lack of progress during the last observation period and did not amend the treatment plan in relation to the lack of progress or the proposed changes have little chance at improving behavior. The information submitted does not meet standards of care within the field of behavior analysis. This request is denied.

...

Pages 22 – 23 of RCE 1.

5. Petitioner requested reconsideration of the Respondent’s decision. In a Notice of Reconsideration Determination (“NRD”), dated November 17, 2023, Respondent upheld its decision. *Id.* at 34. The NRD explained the basis for the decision as follows:

PR Recon Determination: At reconsideration all documents were carefully reviewed. According to the Florida Medicaid State Plan (Appendix 9.3.b), the data provided must show evidence that the frequency of the maladaptive behavior(s) has decreased since the last review and, if not, that there is a modification of the behavior plan. The recommendations for procedural modifications include: additions/changes to treatment plan to impact behaviors targeted for reduction. Procedural modifications should include one or more of the following: antecedent manipulation modifications, modifications of prompting procedures used in acquisition, modifications in consequence-based strategies- - ones that either reduce maladaptive behavior or reinforce replacement behavior (e.g., manipulation of reinforcement schedules, switch to a different decelerative procedure), or if lack of progress was due to therapist error (e.g., poor data collection or poor training on intervention methods), how the provider will address human error. The recommendations are insufficient to support continued care.

...

Pages 34 – 35 of RCE 1.

6. On October 6, 2023, Petitioner requested a Fair Hearing to challenge the termination of ABA services. On November 15, 2023, the undersigned issued an Order Scheduling Fair Hearing by Telephone and Prehearing Instructions, setting the hearing for December 12, 2023, at 1:00 p.m. EST. *Id.*

7. Dr. Switzer is a Board Certified Behavior Analyst at the doctoral level. Dr. Switzer testified to the following at the Fair Hearing:

- a. Treatment in the last review period contained a punishment procedure without previously exhausting all reinforcement strategies, which does not meet

standards of care in ABA. The treatment plan also contained treatment goals that are not medically necessary, such as "[REDACTED]" and "[REDACTED]". There was also a lack of progress in the last review period. See page 17 of RCE 1. Services were denied due to insufficient progress and insufficient modification. *Id.* at 18.

b. Baseline for [REDACTED] behavior was based on parent report. *Id.* at 88. Baseline collected by a caregiver is inconsistent with standards of care of ABA. The graph for [REDACTED] frequency shows variability and no consistent or maintained decreasing trend throughout the review period, nor indication that modifications were made to the plan. *Id.* at 90. The lack of modification does not meet standards of care in ABA. The behavior of [REDACTED] displays increasing trends reaching [REDACTED] occurrences per week. *Id.* at 93. Levels remain higher than baseline. *Id.* [REDACTED] has been in baseline without treatment from June 2023 to August 2023, and no intervention or reinforcement was applied. *Id.* This is not consistent with accepted standards of care in ABA. This behavior is addressed with punishment procedure without first exhausting reinforcement strategies. *Id.* at 94. The procedure has not had the intended effect and no further modifications were made. *Id.* at 93.

c. [REDACTED] displays increasing trends, and the behavior is higher in frequency than in baseline. *Id.* at 95. There is no consistent decreasing trend or modification. *Id.* [REDACTED] displays variability and level trends, with levels at the end of the authorization being the same as those in baseline. *Id.* at

98. There is no progress or modification. *Id.* [REDACTED] shows variability and no maintained decreasing trend. *Id.* at 100.

d. Baseline for [REDACTED] occurs at [REDACTED] indicating a skill that Petitioner already has. *Id.* at 103. The graph for [REDACTED] shows minimal data points and no consistent progress or increasing trend. *Id.* at 105. There is no modification, which does not meet standards of care within ABA. *Id.* [REDACTED] shows regression and a decreasing trend. *Id.* at 107. There is no progress nor modification. *Id.* [REDACTED] shows high variability and no clear increasing trend or modification. *Id.* at 110. [REDACTED] also shows high variability and no clear increasing trend or modification, with levels higher than baseline. *Id.* at 112. [REDACTED] shows variability and has maintained baseline levels. *Id.* at 115. There is not significant progress nor modification. *Id.*

e. Updated graphs were submitted for reconsideration. *Id.* at 179. Updated [REDACTED] duration graphs show decreasing durations toward the end of the authorization. *Id.* [REDACTED] frequency shows variability and no consistently reduced behavior. *Id.* New lines on the graphs indicate staffing and setting changes. *Id.* The data continue to show variability, and it is not apparent that there has been further modification to address the lack of progress. *Id.* The updated graph for [REDACTED] contains new lines indicating the implementation of the [REDACTED], [REDACTED]. *Id.* at 182. The behavior shows minor but inconsistent decreasing trends following the implementation of the [REDACTED]

██████████, which is the punishment procedure. *Id.* Reinforcement procedures must be implemented first and foremost. *Id.* This does not meet standards of ABA. The fading plan for the punishment procedure is not empirically sufficient and is not consistent with standards of ABA. *Id.* at 183.

- f. ██████████ shows no modification. *Id.* at 185. ██████████ shows high variability and minor decrease with no modification. *Id.* at 187. ██████████ is being addressed with a punishment procedure, ██████████, and the plan lacks proper instructions and details for the procedure to make it empirically sufficient. *Id.* at 189.
 - g. Five (5) out of six (6) replacement skills show either variable level or decreasing trends with no progress. *Id.* at 192. Graphs and progress summaries do not contain modifications to address lack of progress. *Id.* This does not meet standards of care within ABA.
8. ██████████ is the ██████████ of Petitioner. ██████████ testified to the following at the Fair Hearing:
- a. ██████████ stated Petitioner has made progress and had only been in ABA for ██████████ ██████████ when the information was submitted. ██████████ stated Petitioner was approved for forty-five (45) hours, but only received three (3) hours a day due to staffing. ██████████ stated the services have helped.
9. ██████████ is the Board Certified Behavior Analyst for Petitioner. ██████████ testified to the following at the Fair Hearing:

- a. [REDACTED] testified that [REDACTED] took over Petitioner’s case in [REDACTED] of this year. A previous BCBA submitted the instant treatment plan, and [REDACTED] stated [REDACTED] has since made significant changes more aligned with ABA standards. [REDACTED] stated the plan does not represent what is currently being implemented. [REDACTED] stated the [REDACTED] was removed, and the provider currently uses a [REDACTED].

10. [REDACTED] is a Board Certified Behavior Analyst. [REDACTED] testified to the following at the Fair Hearing:

- a. [REDACTED] stated [REDACTED] has made several modifications to the plan.

CONCLUSIONS OF LAW

11. The Agency’s Office of Fair Hearings has jurisdiction over the subject matter of this proceeding and the parties pursuant to section 409.285(2), Florida Statutes (2019). This order is the final administrative decision of AHCA under section 409.285(2)(a).

12. This hearing was held as a *de novo* proceeding pursuant to Fla. Admin. Code R. 59G-1.100(17)(b).

13. Because Respondent terminated a previously approved service, Fla. Admin. Code R. 59G-1.100(17)(g) assigns the burden of proof to the Respondent. The standard of proof in an administrative hearing is a preponderance of the evidence. The preponderance of the evidence standard requires proof by “the greater weight of the evidence” (Black’s Law Dictionary at 1201, 7th Ed.)

14. The Florida Medicaid Behavior Analysis Services Coverage Policy (October 2017) (“BA Policy”), incorporated by reference in Fla. Admin. Code. R. 59G-4.125, governs BA services available under Florida Medicaid. The BA Policy provides as follows:

1.0 Introduction

Behavior analysis (BA) services are highly structured interventions, strategies, and approaches provided to decrease maladaptive behaviors and increase or reinforce appropriate behaviors.

...

1.4.5 Medically Necessary/Medical Necessity

As defined in Rule 59G-1.010, F.A.C.

...

4.0 Coverage Information

4.1 General Criteria

Florida Medicaid covers services that meet all of the following:

- Are determined medically necessary
- Do not duplicate another service
- Meet the criteria as specified in this policy

4.2 Specific Criteria

Florida Medicaid covers the following BA services in accordance with the applicable Florida Medicaid fee schedule(s), or as specified in this policy:

4.2.1 Behavior Assessment

One per fiscal year, per recipient, when completed within 30 days of the start of the assessment.

4.2.2 Behavior Analysis

Up to 40 hours per week, per recipient, consisting of services identified on the recipient’s behavior plan in order to reduce maladaptive behaviors and to restore the recipient to his or her best functional level. Services include:

- Implementing behavior analysis interventions, and monitoring and assessing the recipient’s progress towards goals in the behavior plan
- Behavior analysis interventions, for example, discrete trial teaching, task analysis training, differential reinforcement, non-contingent reinforcement, conducting task analyses of complex responses, and teaching using chaining, prompting, fading, shaping, response cost, and extinction
- Training the recipient’s family, caregiver(s), and other involved persons on the implementation of the behavior plan and intervention strategies (the recipient must be present when clinically appropriate)

...

4.3 Early and Periodic Screening, Diagnosis, and Treatment

As required by federal law, 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. Included are diagnostic services, treatment, equipment, supplies, and other measures described in sectioned 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 the coverage described within this policy or the associated fee schedule may be approved, if medically necessary. For more information, please refer to Florida Medicaid's General Policies on authorization requirements.

15. Appendix 9.0 of the BA Policy provides Review Criteria for Behavior Analysis Services.

These Review Criteria state as follows:

Review Criteria for Behavior Analysis Services

Behavior analysis (BA) services are considered as either the treatment of choice or as an adjunct treatment modality for a variety of conditions and disorders where maladaptive behaviors are part of the recipient's clinical presentation, including behavioral manifestations of diagnoses such as Autism Spectrum Disorder and other behavioral health conditions.

Critical Elements Necessary for ANY Type of Behavior Analysis Service:

The following critical elements **MUST** be satisfied to qualify for BA services:

- a. Eligibility – The recipient must meet all criteria for BA services as outlined in the Behavior Analysis Services Coverage Policy, Rule 59G-4.125, F.A.C.
- b. Medical necessity – The recipient must meet medical necessity criteria as outlined in Rule 59G-1.010, F.A.C.
- c. The recipient currently engages in maladaptive behaviors
- d. These maladaptive behaviors interfere with the recipient's daily functioning

1. Criteria for Initial Behavior Analysis Assessment - BOTH of the following **MUST** be satisfied:

- a. **ALL** critical elements are met
- b. Provide submits a valid written physician's order as stipulated in the Behavior Analysis Services Coverage Policy, Rule 59G-4.125, F.A.C.

2. Criteria for Behavior Analysis Services and Reassessments – ALL of the following **MUST** be satisfied:

- a. **ALL** critical elements are met
- b. An assessment or, if applicable, a reassessment, authored by a lead analyst, is provided. An assessment of the maladaptive behavior(s) is a necessary element of the process of identifying the frequency and magnitude of the behaviors as well as the variables associated with the occurrence of the maladaptive behavior(s). This helps in defining what

are the functional consequences of the problem behavior(s) so that an adequate behavior plan can be implemented. This (re)assessment **MUST** include, at a minimum, **ALL** of the following:

- i. A clear operational description of the maladaptive behavior(s)
- ...
- c. A behavior plan authored or updated by a lead analyst. The behavior plan is the cornerstone of the delivery of behavior analysis services and it is based on the information obtained in the assessment. It proposes specific interventions to reduce or eliminate the maladaptive behavior. These interventions take into consideration the variables, both present before the behavior, as well as after the behavior, that influence the occurrence of the maladaptive behavior(s). This plan also includes replacement appropriate behaviors for the recipient to engage in instead of the maladaptive behaviors in order to obtain the same function. The plan must be detailed enough to warrant the requested services and include mechanisms to monitor its effectiveness. This **MUST** include, at a minimum, **ALL** of the following:
 - i. Observable and measurable descriptions of the maladaptive behavior(s)
 - ii. Identified function of the maladaptive behavior(s) behavior as a result of the assessment or reassessment conducted
 - iii. Goals and strategies for changing the maladaptive behavior(s)
 - iv. Written detailed description of when, where, and how often these goals will be addressed and proposed strategies will be implemented
 - v. System for monitoring and evaluating the effectiveness of the plan
 - vi. Safety and crisis plan, if applicable
 - vii. Summary and recommendations
 - viii. Discharge criteria
 - ix. Transition plan (if applicable)

NOTE: Although the assessment and behavior plan were addressed separately in section 2, both of them can be submitted as a single document.

3. Criteria for Continuation of Treatment at the Present Level and/or Using Current Methods: Providers must ensure that ALL of the following criteria are met to request continuation of treatments at the present level or using the current methods. If criteria for 3a is met, but criteria for 3b and/or 3c are not met, then a reduction of the treatment level and/or change of treatment methods may be warranted.

- a. ALL criteria listed in 2a, 2b, and 2c regarding critical elements, assessment or reassessment, and behavior plan, are met.

- b. The data provided must show evidence that the frequency of the maladaptive behavior(s) has decreased since the last review and, if not, that there is a modification of the behavior plan.
- c. The level of functional impairment justifies continuation of BA services. The reviewer utilizes the information provided below as a guide as it relates to the level of functional impairment as expressed through the following behaviors:
 - i. Safety – aggression, self-injury, property destruction, elopement
 - ii. Communication – problems with expressive/receptive language, poor understanding or use of non-verbal communications, stereotyped, repetitive language
 - iii. Self-stimulating, abnormal, inflexible, or intense preoccupations
 - iv. Self-care – difficulty recognizing risks or danger, grooming, eating, or toileting
 - v. Other – behaviors not identified above

16. States must provide Early and Periodic Screening, Diagnostic, and Treatment (“EPSDT”) services to Medicaid-eligible children under age 21 when requested under the Medicaid state plan. *See* 42 U.S.C. § 1396a(a)(43); 42 U.S.C. § 1396d(a)(4). According to 42 U.S.C. § 1396d(r)(5), EPSDT services mean, in relevant part, the following items and services:

Such other necessary health care, diagnostic services, treatment, and other measures described in subsection (a) of this section to correct or ameliorate defects and physical and mental illness and conditions discovered by the screen services, whether or not such services are covered under the state plan.

17. Petitioner is under age 21, and therefore EPSDT applies to his request for services. However, a state may place medical necessity limitations on EPSDT services. *See* 42 C.F.R. §§ 440.230(a), (b), (d). Fla. Stat. § 409.905(2) limits EPSDT services with a medical necessity standard:

The [Agency] shall pay for early and periodic screening and diagnosis of a recipient under age 21 to ascertain physical and mental problems and conditions and all services determined by the agency to be medically necessary for the treatment, correction, or amelioration of these problems and conditions, including personal care, private duty nursing, durable medical equipment, physical therapy, occupational therapy, speech therapy, respiratory therapy, and immunizations.

18. The Definitions Policy, incorporated by reference in Fla. Admin. Code R. 59G-1.010, defines “Medically Necessary” or “Medical Necessity” as follows:

The medical or allied care, goods, or services furnished or ordered must meet the following conditions:

- Be necessary to protect life, to prevent significant illness or significant disability, or to alleviate pain
- 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
- Be consistent with generally accepted professional medical standards as determined by the Medicaid program, and not experimental or investigational
- 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
- Be furnished in a manner not primarily intended for the convenience of the recipient, the recipient’s caretaker, or the provider

The fact that a provider has prescribed, recommended, or approved medical or allied care, goods, or services does not, in itself, make such care, goods or services medically necessary or a medical necessity or a covered service.

19. The Florida Medicaid Authorization Requirements Policy (“Authorization Policy”), incorporated by reference in Fla. Admin. Code R. 59G-1.053, provides as follows:

3.2.1 Continued Authorization Requests

The QIO shall not deny or reduce the amount, frequency, or duration of a service that is already being provided, unless:

- The reduction is to correct for factual error or omissions in prior certifications.
- There is a documented improvement in the recipient’s medical condition.
- There is a documented change in the recipient’s circumstances.
- The reviewing physician determines the recipient will not gain any additional benefit by continuing services at the current level.

20. In the instant case, Respondent terminated Petitioner’s ABA services. See ¶ 4. In the NOO dated September 27, 2023, Respondent explained that continuing services at the prior level was

not medically necessary, specifically, that it did not meet the requirement that services must be “consistent with generally accepted professional medical standards as determined by the Medicaid program, and not experimental or investigational.” *Id.* Respondent further explained that “the provider has not addressed the lack of progress during the last observation period and did not amend the treatment plan in relation to the lack of progress or the proposed changes have little chance at improving behavior.” *Id.*

21. As provided by the EPSDT requirements, the recipient must meet the medical necessity criteria as outlined in Fla. Admin. Code R. 59G-1.010. As provided in section 2.83 of the Definitions Policy, a component of medical necessity is that services must be “consistent with generally accepted professional medical standards as determined by the Medicaid program, and not experimental or investigational.” As shown by the record, the submitted treatment plan does not comply with accepted standards of care within the field of ABA. *See* ¶ 7. Dr. Switzer provided credible testimony that the treatment plan submitted for review contains punishment procedures, although the provider had not exhausted all reinforcement strategies, as required by standards of ABA. *Id.* The plan also contained goals that do not meet medical necessity, baseline values based on parent report, and insufficient progress and modification. *Id.* Dr. Switzer also identified variability, behaviors higher than baseline, a lack of modification, and a lack of maintained decreasing trends regarding the maladaptive behaviors. *Id.* Petitioner’s replacement skills show either variable level or decreasing trends with no progress. *Id.* While Petitioner testified that there have since been significant modifications to the plan, the treatment plan, as it was submitted to eQHealth for review, does not meet the standards of ABA. *See* ¶ 7. As many of the plan’s components do not comply with the accepted standards of ABA, the treatment plan

is not “consistent with generally accepted professional medical standards.” As such, Respondent demonstrated that it was not medically necessary to continue services with the current provider.


22. As QIO for the Agency, eQHealth is authorized to terminate services when “the reviewing physician determines the recipient will not gain any additional benefit by continuing services at the current level.” See ¶ 19. As discussed, *supra* ¶ 21, Petitioner has not made progress in reducing his maladaptive behaviors, nor in improving his replacement behaviors. Here, Petitioner’s lack of improvement and the insufficiencies of the treatment plan are well documented.

23. Upon consideration of the testimony provided, evidence submitted, and applicable polices, the undersigned concludes that Respondent proved by a preponderance of the evidence that the termination of ABA services was necessary. Looking at all the evidence relevant to the particular needs of Petitioner, Respondent has demonstrated that the previously authorized services, based on the treatment plan at issue in this case, are not necessary to correct or ameliorate a defect or a physical and mental illness or condition. Accordingly, Respondent proved by a preponderance of the evidence that Respondent’s termination of ABA services was correct.

IT IS HEREBY ORDERED AND ADJUDGED THAT:

Respondent’s termination of ABA services is **AFFIRMED**. Petitioner’s appeal based on Respondent’s termination is **DENIED**.

DONE and **ORDERED** this 25th day of January, 2024, in Tallahassee, Leon County, Florida.

 Joseph Mabry
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JOSEPH MABRY, Hearing Officer

**Agency for Health Care Administration
Office of Fair Hearings
2727 Mahan Drive, Mail Stop # 11
Tallahassee, FL 32308-5407**

NOTICE OF A RIGHT TO JUDICIAL REVIEW

A PARTY WHO IS ADVERSELY AFFECTED BY THIS FINAL ORDER IS ENTITLED TO JUDICIAL REVIEW, WHICH SHALL BE INSTITUTED BY FILING THE ORIGINAL NOTICE OF APPEAL WITH THE AGENCY CLERK OF AHCA, AND A COPY, ALONG WITH THE FILING FEE PRESCRIBED BY LAW, WITH THE DISTRICT COURT OF APPEAL IN THE APPELLATE DISTRICT WHERE THE AGENCY MAINTAINS ITS HEADQUARTERS OR WHERE A PARTY RESIDES. REVIEW PROCEEDINGS SHALL BE CONDUCTED IN ACCORDANCE WITH THE FLORIDA APPELLATE RULES. THE NOTICE OF APPEAL MUST BE FILED WITHIN 30 DAYS OF THE RENDITION OF THE ORDER TO BE REVIEWED.

Copies Furnished To:

[REDACTED]
[REDACTED]

**AHCA Medicaid Hearing Unit
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