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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Sierra Ott, on behalf of L.O., Chelsea)	
Zimmerman, on behalf of E.Z., and others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No.: 3:24-cv-00153-SLG
State of Alaska, Department of Health,)	
Heidi Hedberg, in her official capacity as)	
Commissioner of the Department, Division)	
of Public Assistance, and Deb Etheridge, in)	
her official capacity as Director of the)	
Division,)	
)	
Defendants.)	

AFFIDAVIT OF DEB ETHERIDGE

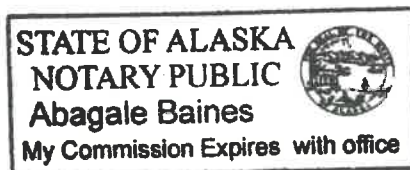
STATE OF ALASKA)
) ss
FIRST JUDICIAL DISTRICT)

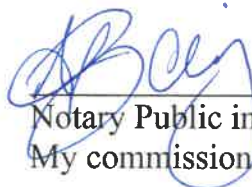
1. I, Deb Etheridge, am over the age of 18 and competent to testify. I make this Affidavit in support of the Defendant's Motion to Dismiss.
2. I am the Director of the Division of Public Assistance within the State of Alaska Department of Health ("DPA"). I started in that position in January of 2023. In that position, I oversee administration of all DPA programs, including Medicaid. This affidavit is based on my personal knowledge and appropriate consultation with DPA staff.
3. One of DPA's responsibilities is to make eligibility determinations for individuals seeking Medicaid coverage.
4. Two categories of Medicaid applicants require a disability determination in addition to income eligibility. These are Adult Public Assistance beneficiaries under the age of 65, who must be low income and have a severe and long-term disability to qualify, and children eligible for TEFRA Medicaid, which covers children with disabilities and significant medical needs.
5. Plaintiffs L.O. and E.Z. are both child applicants for TEFRA Medicaid.
6. Pursuant to the State Medicaid Plan reviewed and approved by the federal Centers for Medicare and Medicaid Services, DPA has entered into an MOU with the Disability Determination Services within the Department of Labor and Workforce Development ("DDS") to perform disability determinations.
7. Pursuant to this MOU, DDS performs the disability determinations for both Adult Public Assistance and child applicants for TEFRA Medicaid Coverage.

8. DPA cannot process initial Medicaid applications until DDS completes the disability determination.
9. One major obstacle standing between DPA and meeting the 90-day timeliness goal set forth in regulation for processing initial Medicaid applications is a shortage of employees.
10. We continue to actively recruit to fill necessary positions. Recruiting for these positions is hampered by the national labor shortage, pay, and the work that staff are expected to undertake.
11. Contributing to the delay is the fact that it takes time to train new hires.


Deb Etheridge

SUBSCRIBED AND SWORN TO 8/5/2024 at Anchorage, Alaska.




Notary Public in and for the State of Alaska
My commission expires: with office