

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF
DANIEL J. BAKER, PHD,
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

DANIEL J. BAKER, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Internal Reviewer, Quality Assurance and Disability Compliance Services ("QADC Services").

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' August 2019 Semi-Annual Compliance Report ("Report") and Response to the June 17, 2019 Court Order ("Response").

3. I have personal knowledge of the information I provided for the following sections of the Report and Response and verify that the information I provided is correct

and accurate: January 1, 2019 to June 30, 2019 Updates regarding Evaluation Criteria 39, 41, and 98; and Response to the June 17, 2019 Court Order section I.


4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not-public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

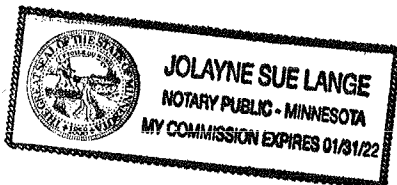
FURTHER YOUR AFFIANT SAYETH NOT.


DANIEL J. BAKER, Ph.D.

Subscribed and sworn to before me on

August 26, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF
MARGARET FLETCHER BOOTH,
PH.D., CONCERNING
VERIFICATION OF DEFENDANTS'
AUGUST 2019 SEMI-ANNUAL
COMPLIANCE REPORT AND
RESPONSE TO THE JUNE 17, 2019
COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

MARGARET FLETCHER BOOTH, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Manager, Quality Assurance and Disability Compliance Services ("QADC Services").
2. I am familiar with the above-captioned case and settlement.
3. I am familiar with the contents of the Defendants' August 2019 Semi-Annual Compliance Report ("Report"), the Response to the June 17, 2019 Court Order ("Response") and the associated Identifier Key.
4. Based upon my own personal knowledge of the contents of the Report, I verify that the unredacted version of the Report filed under seal contains private welfare

data that, under Minn. Stat. § 13.46, subd. 2(a), DHS is prohibited from publicly disclosing and private personnel data that, under Minn. Stat. § 13.43, subd. 4, DHS is prohibited from publicly disclosing.

5. Based upon my own personal knowledge of the contents of the Response, I verify that the unredacted version of the Response filed under seal contains private welfare data that, under Minn. Stat. § 13.46, subd. 2(a), DHS is prohibited from publicly disclosing.

6. Based upon my own personal knowledge of the contents of the Report and Response, I verify that the unredacted version of the Identifier Key filed under seal contains private welfare data that, under Minn. Stat. § 13.46, subd. 2(a), DHS is prohibited from publicly disclosing.

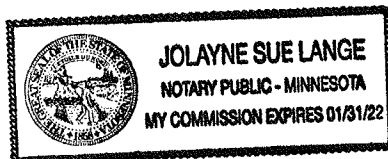
FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, Ph.D.

Subscribed and sworn to before me on

August 29, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF MARGARET
FLETCHER BOOTH, PH.D.,
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

MARGARET FLETCHER BOOTH, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Manager, Quality Assurance and Disability Compliance Services ("QADC Services").

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' August 2019 Semi-Annual Compliance Report ("Report") and Response to the June 17, 2019 Court Order ("Response").

3. I have personal knowledge of the information I provided for the following sections of the Report and Response and verify that the information I provided is correct

and accurate: January 1, 2019 to June 30, 2019 Updates regarding Evaluation Criteria 39, 41, and 98; and Response to the June 17, 2019 Court Order, sections I and II.

4. I further hereby verify the data contained in the portions of the Report and Response described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not-public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

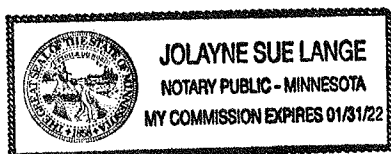
FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, Ph.D.

Subscribed and sworn to before me on

August 26, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 (DWF/BRT)

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.

Defendants.

**AFFIDAVIT OF MARGARET
FLETCHER BOOTH, PH.D.,
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

MARGARET FLETCHER BOOTH, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Manager, Quality Assurance and Disability Compliance Services ("QADC Services").
2. I am familiar with the above-captioned case and settlement.
3. In order to verify that the data in Defendants' August 2019 Semi-Annual Compliance Report ("Report") and Response to the June 17, 2019 Court Order ("Response") is reliable and valid and that the statements in the Report and Response are accurate, complete, timely, and verified, QADC Services: (a) had individuals with personal knowledge of specific information they provided for the Report and/or Response

verify that the information they provided is correct and accurate; (b) had those individuals attest to their above-referenced verification in an affidavit; and (c) conducted the supplemental verification activities described in relevant sections of the Report and Response.

4. Based on this process and my own personal knowledge, I verify that the data in the Report and Response is reliable and valid, and that statements in the Report and Response are accurate, complete, timely, and verified.

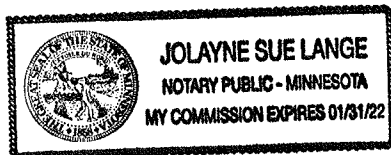
FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, Ph.D

Subscribed and sworn to before on

August 29, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF MARK BROSTROM
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF ISANTI)

MARK BROSTROM, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Manager, Minnesota Life Bridge Treatment Homes.

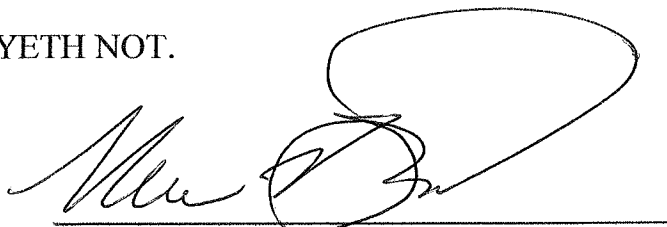
2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' August 2019 Semi-Annual Compliance Report ("Report") and Response to the June 17, 2019 Court Order ("Response").

3. I have personal knowledge of the information I provided for the following sections of the Report and Response and verify that the information I provided is correct and accurate: January 1, 2019 to June 30, 2019 Updates regarding Evaluation Criteria 2,

3, 47, 48, 49, 50, 51, 52, 53, and 64; Exception Reporting Evaluation Criteria 22, 29, 32, 33, 35, and 36; and Response to the June 17, 2019 Court Order, section II.

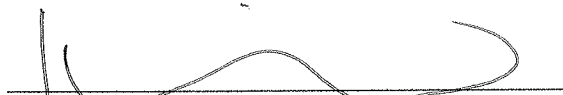
4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not-public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted Quality Assurance and Disability Compliance Services ("QADC Services") at DHS so that the data can be filed under seal.

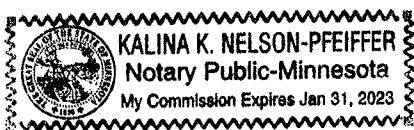
FURTHER YOUR AFFIANT SAYETH NOT.


MARK BROSTROM

Subscribed and sworn to before me on

August 27th, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,
Plaintiffs,

Case No. 09-cv-01775 DWF/BRT

vs.

Minnesota Department of Human
Services, et al.,
Defendants.

**AFFIDAVIT OF STEVEN DAHL
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**


STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

STEVEN DAHL, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Director, Community Support Services and Short Term Residential Services.
2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' August 2019 Semi-Annual Compliance Report ("Report").
3. I have personal knowledge of the information I provided for the following sections of the Report and verify that the information I provided is correct and accurate: January 1, 2019 to June 30, 2019 Updates regarding Evaluation Criteria 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, and 93.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not-public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted Quality Assurance and Disability Compliance Services ("QADC Services") at DHS so that the data can be filed under seal.

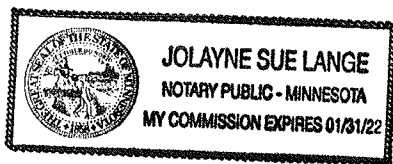
FURTHER YOUR AFFIANT SAYETH NOT.


STEVEN DAHL

Subscribed and sworn to before me on

August 26, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF
NOREEN KOCH-MYER,
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

NOREEN KOCH-MYER, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Director, Direct Care and Treatment Learning and Development.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' August 2019 Semi-Annual Compliance Report ("Report") and Response to the June 17, 2019 Court Order ("Response").

3. I have personal knowledge of the information I provided for the following sections of the Response and verify that the information I provided is correct and accurate: Response to the June 17, 2019 Court Order section II.

4. I further hereby verify the data contained in the portions of the Response described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not-public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.


FURTHER YOUR AFFIANT SAYETH NOT.



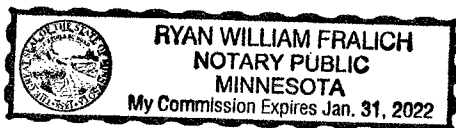
NOREEN KOCH-MYER

Subscribed and sworn to before me on

August 26, 2019



NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF
KAREN SULLIVAN HOOK
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

KAREN SULLIVAN HOOK, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Deputy Senior Counsel and Administrative Law Office Manager.
2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' August 2019 Semi-Annual Compliance Report ("Report").
3. I have personal knowledge of the information I provided for the following sections of the Report and verify that the information I provided is correct and accurate: January 1, 2019 to June 30, 2019 Update regarding Evaluation Criterion 103.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not-public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted the Quality Assurance and Disability Compliance Services (“QADC Services”) at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.



KAREN SULLIVAN HOOK

Subscribed and sworn to before me on

August 26,, 2019



Sharon Celine Christensen
NOTARY PUBLIC

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF
MICHAEL TESSNEER
CONCERNING VERIFICATION OF
DEFENDANTS' AUGUST 2019
SEMI-ANNUAL COMPLIANCE
REPORT AND RESPONSE TO THE
JUNE 17, 2019 COURT ORDER**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

MICHAEL TESSNEER, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services ("DHS") as Director of Compliance, Olmstead Implementation Office.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' August 2019 Semi-Annual Compliance Report ("Report").

3. I have personal knowledge of the information I provided for the following section of the Report and verify that the information I provided is correct and accurate: January 1, 2019 to June 30, 2019 Update regarding Evaluation Criterion 79.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not-public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted Quality Assurance and Disability Compliance Services ("QADC Services") at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.



MICHAEL TESSNEER

Subscribed and sworn to before me on

August 24, 2019



NOTARY PUBLIC

