

## Tad Stone

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**From:** Dylan Reingold  
**Sent:** Tuesday, December 03, 2019 10:53 AM  
**To:** 'Kristen.Johnson@ahca.myflorida.com'  
**Cc:** Steve Greer; Tad Stone  
**Subject:** PEMT LOA

Kristen,

Thank you for talking with me this morning about the proposed LOA. As we discussed, the Indian River County Emergency Services District will be sending roughly \$146,000 to AHCA. ACHA will pool that money with the other IGTs that are submitted to AHCA. AHCA will then use that money as a match to obtain federal dollars. Then at the end of the day money will flow back to the various entities, including the Indian River County Emergency Services District, from the managed care entities.

The concern I have is that none of this is spelled out in the LOA. All the LOA requires is that the Indian River County Emergency Services District submit the funds to AHCA and that the Indian River County Emergency Services District will have to comply with various legal requirements. However, the LOA contains no obligations on AHCA. Thus, the Indian River County Emergency Services District is not getting anything in return from AHCA under the LOA.

I would recommend that at a minimum background recitals or whereas clauses be added that help explain the process and what the Indian River County Emergency Services District is getting in return for meeting its obligations. Without such language, the LOA is an agreement by the Indian River County Emergency Services District to perform actions, with no exchange, bargain or consideration from AHCA.

I would welcome a conversation with an attorney in your office.

Thank you!  
Dylan Reingold  
County Attorney  
Indian River County