

FREDERIC THEODORE LE CLERCQ

February 27, 2024

Via Email & U.S. Mail

Mississippi Division of Medicaid
Office of Procurement
550 High Street, Suite 1000
Jackson, MS 39201
Procurement@medicaid.ms.gov

Mississippi Division of Medicaid
Public Records Officer
550 High Street, Suite 1000
Jackson, MS 39201
RFI@medicaid.ms.gov

CSRA State and Local Solutions LLC
c/o Ms. Kathleen Delaney
249 Covell Road
Fairfield, ME 04937
Kathleen.Delaney@gdit.com

FEI Systems, Inc.
c/o Mr. Frank Persinger
9755 Patuzent Woods Drive
Suite 300
Columbia, MD 21046
frank.persinger@feisystems.com

Conduent State Healthcare, LLC
c/o Ms. Ana Beatriz Quezada J.
100 Campus Drive
Florham Park, NJ 07932
FOIARRequests@conduent.com

Gainwell Technologies LLC
c/o Mr. David Gilbert
5615 High Point Drive
Irving, TX 75038
PublicRecordsRequests@gainwelltechnologies.com

Re: Notice of Intent to Seek Protective Order Pursuant to Mississippi Code § 25-61-9

All:

We represent MedeAnalytics Inc. (“MedeAnalytics”). The Mississippi Division of Medicaid (“DOM”) has notified MedeAnalytics that FEI Systems, Inc., CSRA State and Local Solutions LLC, and Gainwell Technologies LLC (collectively “Requesters”) submitted requests to obtain records maintained by DOM related to RFP #4243 (“RFP”). Among other things, Requesters ask for technical and cost proposals from all bidders/responding parties, and CSRA requested technical and cost responses from all bidders/responding parties. Copies of the requests and notices of the requests from DOM to MedeAnalytics are attached.

MedeAnalytics submitted a bid in response to the RFP. Therefore, its information is subject to Requesters’ requests. The information that Requesters seek includes MedeAnalytics’s trade secret, confidential, and proprietary information (“Confidential Information”), including without limitation:

- Commercial and financial information
- Trade secrets
- Organization, staffing, key personnel and personnel personal data
- Privacy, data protection, recovery and cyber security information
- Project work plan and methodologies

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- Testing and compliance strategies
- Training approaches
- Maintenance and operations processes
- Cost information
- Customer and subcontractor data
- Acquisition and market information
- Historical performance data
- Scorecard metrics and data analytics

The Confidential Information is exempt from the Mississippi Public Records Act of 1983 and should not be disclosed. See Miss. Code Ann. §§ 25-61-9(1) and 79-23-1. Therefore, MedeAnalytics gives notice to DOM and Requesters that unless Requesters withdraw or modify their requests, MedeAnalytics will seek a protective order from the Chancery Court of the First Judicial District ff Hinds County preventing the disclosure of the Confidential Information.

MedeAnalytics respectfully requests that DOM immediately publish this notice on the Mississippi Procurement Portal.

Sincerely,

/s/ Ted Le Clercq

FREDERIC THEODORE LE CLERCQ

cc: David Schribman, Esq. (via e-mail)