

# UC Legal Health Affairs, Privacy & Data Protection 2025-27 Preferred Provider Program Request for Proposals

## RFP Overview

The University of California, UC Legal - Office of the General Counsel ("[UC Legal](#)") seeks a limited number of preferred outside law firms to assist with the majority of our health law, privacy, and cybersecurity matters. The types of matters included in this Request for Proposals ("[RFP](#)") are outlined in the Scope section below (collectively, the "[Covered Matters](#)"). The firms we ultimately select will be known as the UC Legal Health Affairs, Privacy & Data Protection Counsel preferred provider panel and will represent the University as part of the UC Legal Health Affairs, Privacy & Data Protection Law Preferred Provider Program ("[Panel](#)"). We anticipate that each firm will have significant opportunities, subject to performance, to represent the University. While a separate litigation panel has been selected by our Litigation section, UC Legal practice groups work closely on many non-litigated and litigated matters.

Panel firms will be able to represent the University across all Covered Matters for which they have qualified and may have the opportunity to bid for work in other practice areas not indicated in the Scope section below. Although we reserve the right to assign Covered Matters work to non-Panel firms, we anticipate that a significant majority of the Covered Matters work will go to Panel firms.

Responding firms must agree to abide by the Panel Requirements and Terms and Conditions of this RFP as stated below.

## About UC

The [University of California](#), one of the largest and most acclaimed institutions of higher learning in the world, is dedicated to excellence in teaching, research, health care, and public service. It is a public institution [encompassing](#) ten undergraduate and graduate campuses, six academic medical centers, eight community hospitals, twenty health professions schools, and a statewide Division of Agriculture and Natural Resources. The University also is involved in the operation and management of three national laboratories for the U.S. Department of Energy.

The [Office of the President](#), based in Oakland, California, provides system-wide management of the University. Its divisions oversee UC's academic mission, budget, external relations, legal matters, and business and financial activities. The University is governed by a [Board of Regents](#).

## About UC Legal

UC Legal, working collaboratively with our clients, seeks to advance the University's mission through skilled advice, vigorous advocacy, and effective, proactive counsel. Our goal is to be valued and trusted partners, recognized for our creativity, industry-leading expertise, and commitment to client objectives. We are committed to fairness and diversity in all our interactions, and we value a commitment to diversity in our retained counsel. For more information about us and our values, please visit our website at <https://www.ucop.edu/uc-legal>.

UC Legal attorneys, whether located at the Office of the President or resident at the University's

campuses, medical centers, and national laboratories, partner with outside counsel to provide legal services in a variety of areas. Covered Matters arising out of this RFP typically will be supervised by Oakland-based attorneys in UC Legal's Health Affairs, Privacy & Data Protection ("HAPDP") section. Other sections of UC Legal supervise matters in Legal Policy and Operations; Business, Transactions & Innovation; Education Affairs, Employment & Governance; and Litigation. Smaller matters sometimes are supervised locally at a campus, medical center, or national laboratory.

## Panel Scope (Covered Matters)

The scope of this RFP and the Panel is, except as otherwise expressly provided, for U.S. matters only, which are heavily concentrated in California. The matter types are broken into two groups:

- Group I matters are typically complex matters that pose a significant operational, reputational, and/or financial risk to the university system and that involve anticipated outside counsel spend exceeding \$100,000 per matter. Group I matters include complex corporate transactions (e.g., whole hospital mergers, acquisitions, or affiliations; multi-year system-wide provider agreements with health plans; ancillary provider joint ventures; single-campus health plan agreements). Additionally, Group I matters are those that require legal expertise on regulatory, white collar (including both health, privacy, data protection and research investigations), and/or cybersecurity issues.

- Group II matters are highly specialized and typically (but not consistently) involve lower outside counsel spend (i.e., less than \$100,000 per matter). The smaller size of these matters may include fixed-fee retainers for routine advisory work.

You may choose to apply to represent the University in any or all of the matter types listed, but you should apply only for areas in which you have demonstrated expertise (in both substance and risk level) and for which you can offer economically practical services. Please respond to the questions for each matter type for which your firm would like to be considered.

Group I (complex regulatory, white collar or cybersecurity matters; complex corporate transactions)

- Cybersecurity Advice, Breach Response and Notification
- Reimbursement/Payer Disputes (commercial and government payers with UC as the provider in the dispute)
- Transactions
- White Collar – Internal Investigations and Defense of Government Investigations (including via *qui tam* complaints and/or Congressional investigations and including in the areas of health, cybersecurity and research such as foreign influence, export control, research security or Higher Education Act Section 117 investigations)

Group II (highly specialized, typically smaller, less frequent – but sometimes high-impact/high-risk; deep knowledge of both federal and California regulatory systems generally required)

- Academic Affairs
  - Faculty-Administration Relations/Shared Governance
  - Faculty Practice Plans (and affiliations with Academic Health Systems)
  - Graduate Medical Education including academic affiliations, accreditation surveys, reimbursement, investigations, moonlighting rules, etc.
  - Religious Liberty/Establishment Issues
- Antitrust (healthcare-specific) including but not limited to:
  - Office of Health Care Affordability (OHCA) Cost and Market Impact Review (CMIR)

- California Attorney General Nonprofit Transaction Review
- Health Insurance/Health Plans (employer and provider sides)
  - Captive Insurers; Risk Retention Groups
  - Managed Care/Insurance Contracting
  - Managed Care/Insurance Regulation (esp. Knox-Keene; DMHC; CDI)
  - Self-Funded Health Plan Administration
- Information Privacy, Confidentiality, and Security
  - Cybersecurity, Breach Response and Notification
  - AI and “Big Data” including best practices with respect to sharing of de-identified data
  - Federal privacy laws and regulations including HIPAA, FERPA, GLBA, CIRCIA, SAMHSA Regulations, human subjects research laws and regulations promulgated by OHRP and FDA, interoperability and information blocking regulations, and related higher education, research, and federal health privacy rules
  - Federal information security laws including HIPAA and FISMA, standards including NIST and ISO, and related higher education, research, and health privacy rules
  - California privacy and security laws and regulations including the Information Practices Act, Confidentiality of Medical Information Act, and other California health privacy rules
  - National and international data breach reporting rules
  - The European Union’s General Data Protection Regulation and the EU AI Act
  - Other international privacy and security laws and regulations
  - *If you are applying for this work, please describe any internal technical experts you employ, specify whether they are attorneys or non-attorneys, and provide their rates*
- Medical Staff
  - PSQIA
  - Medical Staff Governance
    - Peer Review including Fair Hearings, whether involving academic medical centers, community hospitals or student health centers and whether on behalf of the medical staff or as hearing or appeals officer. Please also describe your expertise in advising the medical staff on (1) potential litigation claims under Cal. Health & Safety Code 1278.5, and (2) the impact of parallel investigations or hearings in faculty discipline, Title IX, etc. Please note that this panel does not encompass actual litigation under Section 1278.5 or matters involving faculty discipline, Title IX, etc.
- Pharmacy Regulation
  - Hospital, Retail and Clinic Pharmacy Representation before Board of Pharmacy
  - Controlled substances laws and regulations
  - Pharmacy laws and regulations including licensing and compounding pharmacy rules
- Public/Academic and Community Hospital and Health System Operations and Reimbursement
  - California Medical Foundations (including Cal. Health & Safety Code 1206(l))
  - Clinical Laboratories – State and Federal Accreditation and Reimbursement
  - Enrollment (Medicare, Medicaid/Medi-Cal)
  - FQHCs (Federally Qualified Health Centers)
  - Government Health Care Program Reimbursement (including Medicare, California Waiver/Medi-Cal and Supplemental Payment Systems; Intergovernmental Transfers; Certified Public Expenditures)
  - Hospital Operations/Regulatory Advice (e.g., CCR Title 22, Medicare COPs, TJC, LPS Act)
  - Licensure and Accreditation including change of ownership situations
  - Nonprofit Tax Matters
  - VAMC Affiliations
- Regulatory/Internal Investigations/White Collar

- Conflicts of Interest/Open Payments
- Controlled Substances Regulation and Diversion
- Corporate Governance (with particular focus in public entities, higher education, and/or health care organizations)
- Fraud and Abuse – Health Care
- Fraud and Abuse – Research
- Government Investigations/Audits (e.g., DOJ, OIG, NIH, NSF, OHRP, FDA, CDPH, CMS)
- Immigration
- Medical Marijuana/Legalization
- Sexual Harassment/Sexual Violence in Academic Medical Centers
- Use of Civil False Claims Act to Sue on the Basis of Inaccurate Cybersecurity Representations including to Federal Agencies
- Anti-Discrimination in Academic Medical Centers, e.g., Title VI and Section 1557 Compliance
- Self-disclosures (e.g. DHCS, OIG, SRDP)
- Research and Clinical Trials
  - Animal Research
  - Conflicts of Interest in Research (including NIH, NSF, NASA, DOE, FDA regulations, and undue foreign influence matters)
  - Export Controls/Fundamental Research Exclusion/OFAC Sanctions
  - FDA Regulation of Drugs, Devices, and Biologics
  - Grants and Contracts (government and nongovernment sponsors)/OMB Uniform Guidance/Research Terms and Conditions/Cost Principles
  - Human Subjects Research/Clinical Trials
    - Research and Health Data – ownership, access, data sharing requirements
  - Research Compliance (Miscellaneous)
  - Research Misconduct/Research Integrity Compliance and Investigations (and PHS and NSF regulation)
  - VAMC/VA Research Affiliates
- Transactions/Corporate (specific to healthcare and research)
  - Government Contracts/Federal Acquisition Regulation
  - Group Purchasing Organizations
  - International (specify regions/countries and for each, whether services are provided directly by your firm or by firm partners or affiliates)
  - Mergers/Acquisitions/Joint Ventures/Clinically Integrated Networks
  - Procurement; Public Contracts/Public Bidding (California)
  - Public Entity Affiliations with Health Systems with Ethical and Religious Directives
  - Venture Investment/Finance

## Panel Requirements

1. Abide by the Health Affairs, Privacy & Data Protection Master Retention (Appendix A); the UC Legal Outside Counsel Guidelines (Appendix B); where applicable, the Business Associate Agreement (Appendix C); and the University's Appendix Data-Security (Appendix D)<sup>1</sup>
2. Confirm that no conflicts exist (or in response to the General Questions below, specify any that do), and agree that with very limited and narrow exceptions proposals for which must be made as part of your RFP response, UC Legal will not approve advance blanket waiver requests and instead will consider all waivers on a case-by-case basis

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<sup>1</sup> The current master retention letter and outside counsel guidelines are attached.

3. For Group I matters, please propose value-based pricing methodologies that would be acceptable to your firm (see Value-Based Pricing section below)
4. For Group II matters only, provide a proposal for a heavily discounted monthly retainer for routine advice in any combination of the practice areas listed (all-in, by group, or individually)
5. Please provide an additional annual volume-based discount based on annual spend on your firm across HAPDP and/or across all areas of UC Legal
6. Use the UC eBilling system for electronic invoice submittals (CounselLink)
7. Participate in the Annual Performance Review (see Annual Performance Review section below)
8. Participate, as requested by UC, in reporting and other activities related to diversity, equity, inclusion and belonging
9. No mention of the University of California or use of its marks in any marketing or similar material without prior written approval and then only consistent with the requirements of Cal. Ed. Code §§ 92000 et seq. and applicable University policies
10. Provide at least a 15% discount for any hourly fees (hourly work performed only with prior approval) and state the percentage discount that you are offering

## Matter Engagement Process

For most Group I matters in which we intend to engage outside counsel, those firms that have been qualified for that matter type will be given a matter-specific RFP which will include a summary of the matter, copies of relevant materials, a few substantive questions about the specific matter as well as request a list of the attorneys who are proposed to work on it. In addition, the firm will submit either a pricing template or other requested pricing structure with a proposed value-based pricing proposal. We will review the proposals and select a firm to represent the University in that matter. Selection will be weighted heavily on the substantive responses, but the proposed pricing certainly will be a factor, as will the composition of the proposed team. Although from time to time these Group I matter-specific RFPs may also include a non-Panel firm as a recipient of those RFPs, these RFPs will be sent primarily to Panel firms and Panel qualification will be a significant positive factor in awarding these RFPs.

## Annual Performance Review

As a means to enhance communication and provide feedback to Panel firms, UC Legal may, at its discretion and as necessary, schedule an annual performance review with each Panel firm at the UC Legal office in Oakland or via videoconference at the firm's discretion. We may request that the Panel relationship partner(s) attend. Attendees from UC Legal may include the General Counsel, Deputy General Counsel and Managing Counsels of HAPDP, other UC Legal lawyers, and/or representatives from our clients. The annual performance review will include a review of the matters, substantive issues, results, financials, and any other topics requested by either party. Panel firms will not charge for time or expenses to attend the annual performance review. Results of these reviews may influence continued participation in the Panel.

## Engagement Requirements

Upon acceptance into the Panel, UC Legal will provide selected firms with an engagement letter indicating agreement to abide by the Panel Requirements and Terms and Conditions as stated in this RFP. After the engagement letters are signed and approved, each subsequent matter assigned to a Panel firm under the Panel will require only an approved Retention Schedule and a reference to the approved engagement letter (including Business Associate Agreement and Appendix-Data Security).

## General Questions – Responses Required

Please provide succinct responses within Smartsheet that clearly and directly answer each question below. Smartsheet has a 4,000 character limit, including spaces.

1. **Contact Information/Relationship Partner(s).** Provide the name and contact information of the attorney with primary responsibility for the overall relationship with UC Legal (note: more than one attorney may be named; for example, if you are the relationship partner for the Litigation Team, you may name a different relationship partner for the Health Affairs, Privacy & Data Protection Team, and within HAPDP, you may name more than one relationship partner – e.g., one for transactional matters and one for regulatory matters or one for California and one for Washington, DC/Federal matters).
2. **Firm/Office Demographics.** *The following information will not affect evaluation of a firm's application.* Please provide the following information (you may attach your current NALP form to this application if the information requested is contained therein, but all points below must be addressed in your response):
  - Location of offices
  - Number of attorneys firm wide and number in California offices by location
  - Number of equity partners/members, non-equity partners/members, associates, counsel, non-traditional track/staff attorneys, and summer associates in total and in each NALP-designated population (gender identity, race/ethnicity, disability status, openly LGBTQ, and military veterans)
  - Number of new “homegrown partners” (i.e., associates in U.S. offices who were promoted to partner within the past three years) in total and in each NALP-designated population (gender identity, race/ethnicity, disability status, openly LGBTQ, and military veterans)
  - The name and contact information for your diversity chair
3. **Recruitment/Hiring Practices.** Please provide the following:
  - Information about your firm's recruitment practices and how they address historic underutilization of NALP-designated populations
  - Information about diversity fellowships or scholarships offered by your firm
  - Information about any other initiatives sponsored or supported by your firm aimed at promoting diversity within your firm, both generally and in leadership positions, or in the profession
  - Information about any other initiatives sponsored or supported specifically by the proposed relationship partner(s) identified in your response to Question No. 1 aimed at promoting diversity within your firm or in the profession
4. **UC Matters.** Describe how UC matters and credit for working on UC matters are assigned to partners, associates, and other staff.
5. **Scenario.** During a client conference, an equity partner makes sexist, culturally insensitive, racist, homophobic, ableist, or otherwise discriminatory remarks. How would the firm handle the situation? Please include descriptions of any policies and procedures, committees, or trainings currently in place at the firm that would apply to this situation.

6. **Diversity Efforts.** Describe where you think your firm needs to improve the most in creating a more diverse, equitable, and inclusive workplace.
7. **Program/Matter/Knowledge Management.** Describe your firm's processes and systems for both program and knowledge management, and explain how these processes and systems will be used to benefit UC Legal. These may range from client extranets to billing/reimbursement dashboards to access to educational presentations, for example.
8. **Personal Conflicts of Interest.** Describe any business or personal relationships (other than through the University) your firm or proposed members of your panel team have with any UC Legal attorney or staff member, or with other senior leaders of the University of California or UC Health (e.g., Board of Regents, Regents committee members, Regents Officers, President, Vice Presidents, Chancellors, Vice Chancellors, Deans, CEOs, CFOs, CMOs, COOs, CSOs).
9. **Value-Added Services.** Describe any additional services that you would provide UC Legal at no cost to enhance the value of your service overall (e.g., in-service training, access to extranets, etc.). Please also describe your willingness to provide complimentary legal advice on short questions (e.g., 3 to 5 conversations of 15 minutes or less per quarter) and whether that willingness would depend on annual outside counsel spend, volume or frequency of questions, or other factors.
10. **Budgeting and Performance.** Describe any practices, mechanisms or tools you use to assist with budgeting on matters. Please describe how you would communicate with the University when spend on a matter approaches thresholds of total estimated budget or a fixed fee (e.g., 50% or 75% or 90%) and how you would provide early notice of a need to augment the estimated budget or attempt to renegotiate a fixed fee. Given that you are not permitted to exceed estimated budget or a fixed fee without prior written approval by your UC Legal monitor, please describe your willingness to write off unapproved billed time exceeding the estimated budget or a fixed fee. Please also describe the circumstances when you would write off billed time for a timekeeper that the University believes has not provided high-quality legal services or has other performance issues.
11. **Firm Conflicts.** Describe any conflicts your firm has with the University as a result of your representation of other clients for which you will require a waiver (e.g., as a result of pending litigation or transactions). Also describe any (narrowly tailored) blanket or future waivers you would like us to consider should we choose you for our panel.
12. **Ethical Walls.** Describe the arrangements you are willing and able to make to assure that confidential client information is not inadvertently released or otherwise utilized when the University has waived a conflict.
13. **Information Security.** For any firm bidding for Group I matters, please provide a detailed description of your security controls pursuant to a formally recognized framework, such as HECVAT, HITRUST, or SOC2. Due to space limitations with SmartSheet, we ask that you submit this documentation in a separate email to [Michael.Gormley@ucop.edu](mailto:Michael.Gormley@ucop.edu) with the subject reference "Q13 - [Firm Name] HAPDP Group I." If selected pursuant to our initial assessment, we may ask to confer with members of your organization to discuss your information security plan and to review any third-party assessments of your security controls. Because Group I matters involve proprietary, confidential, and sensitive data, firms bidding for Group I matters will be required to include Appendix D (the [Appendix Data Security](#)) as part of their panel engagement letter. Firms bidding only for Group II matters may submit a description of their security controls as part of their initial

proposal (sent in a separate email) or submit such documentation upon request by HAPDP. In order to be approved to the Panel, every firm, including those bidding for Group II matters, must provide acceptable security documentation. Firms handling Group II matters which involves processing sensitive data may also be required to include Appendix D as part of their panel engagement letter. Firms handling Group II matters which do not involve processing sensitive data will not be required to include Appendix D as part of their panel engagement letter.

14. **Use of Artificial Intelligence (AI)**. Describe how your firm utilizes AI in each practice area where you are applying. Be as specific as possible, including any specific AI tools (including off-the-shelf tools that are customized by the firm) that are used and how they are customized or integrated into workflows and in particular if and how AI is used for (1) legal research, (2) e-discovery, (3) contract and/or policy drafting or negotiating, (4) drafting of legal advice, (5) billing, (6) presentations whether related to particular projects or for CLE or client pitches, (7) client communications and (8) responses to panel applications such as this one or RFP responses for particular matters. If your firm has a policy for the use of AI in specific cases, practices areas, or overall, please describe this policy, including whether the firm permits use of personal accounts created in generative AI tools, whether the firm permits use of client materials (de-identified or containing privileged materials or containing PII or PHI) in training or use of AI, whether the firm discloses to clients when generative AI is used in their legal or administrative matters, and whether any human review is required before any materials drafted through generative AI are sent externally or relied upon. How does the firm monitor compliance by its attorneys and staff of any firm policies regarding AI use? If the firm contracts for the use of AI as an item or service, how will you ensure the panel requirements are passed onto these vendors? Will your firm adhere to any client policies or requests regarding the use of AI? If your firm utilizes AI for a given practice area, describe any additional costs and/or savings that are passed on to your clients for such use, how such fees are determined, any training provided to attorneys and staff of in the use of AI, any allotment of hours provided to attorneys or staff to learn how to use AI, and steps your firm takes in mitigating any risk associated with the use of AI.
15. **Value-Based Pricing/Alternative Fee Arrangements**. Describe your experience with value-based pricing and other alternative fee arrangements in each area where you are applying. Be as specific as possible. A general “we are open to alternative fee arrangements” or “we have worked under alternative fee arrangements” is not a useful response.
16. **Hourly Rates**. For situations where UC Legal approves hourly work, please provide your current rack rates and rates expected for CY 2025-27 for all attorneys and other billing staff you propose to work on Panel matters. Also provide your proposed hourly rate for partners, senior counsel/of-counsel, associates, and non-attorney billing staff (e.g., paralegals and crisis communications experts). We strongly prefer standardized rates in each class but will accept proposals by practice group or, if absolutely necessary, by individual. *Provide a proposal that will be good for at least three years (whether one fee good for the entire period or a fee plus a defined escalator).*
17. **Professional Misconduct/Professional Malpractice**. Has your firm or any firm attorney been a named defendant in a legal malpractice case during the past 10 years, or has any firm attorney been sanctioned by a court or regulatory authority or otherwise disciplined by any state Bar? If so, please provide details.
18. **Major Expected Changes**. Describe any potential or planned changes that, in the next 12-24 months, could significantly change any of the information provided in your response to this RFP.



19. **Additional Considerations.** Discuss any other issues or considerations that you believe are relevant as a candidate for the Panel.

## Group-Specific Questions – Responses Required

For each matter group or specific matter type for which you wish to be considered in Group I, please provide:

1. A brief description of your relevant practice and how this practice differentiates itself from similar practices at other firms.
2. The name, contact information and background information of the attorney proposed to have primary responsibility for the specific area of practice for UC as well as of all other members of the proposed team. Explain why each individual has been proposed and their specific area of work or specialty, including any relevant experience with government agencies regulating health care, academic research or teaching, or cybersecurity.
3. A description of at least three similar matters handled in the past year along with the final disposition as applicable. For Group I matters related to cyber incident response, please also describe your firm's use of data mining tools or advanced analytics to aide/expedite the assessment of files for reportable data elements (e.g., financial account information, Social Security Numbers, dates of birth, etc.).

For Group II matters, please respond to at least the first two questions.

## Terms and Conditions

Applications must be submitted through the Smartsheet form available at <https://www.ucop.edu/uc-legal/hatl-rfp.html>. We strongly recommend preparing your responses before filling out the submission form in Smartsheet. Smartsheet does not have an option to save your progress through multiple sessions. UC Legal will accept submissions **no later than 5:00 p.m. on Friday, November 15, 2024**.

We do not intend to look at extraneous marketing material during this process. **ALSO, DO NOT SEND PAPER. IT WILL BE RECYCLED WITHOUT REVIEW AND ITS CONTENT WILL NOT BE CONSIDERED IN THIS PROCESS. WE LIKE THE TREES AND DO WHAT WE CAN TO SAVE THEM.**

All information provided by UC Legal in connection with this RFP shall be considered proprietary information of UC Legal. All documentation and/or ideas submitted by your firm shall also become the property of UC Legal.

If your firm has a question during this process, please send it to [Michael.Gormley@ucop.edu](mailto:Michael.Gormley@ucop.edu). All such questions or requests must be received by **5:00 p.m. on November 15, 2024**, and all such questions or requests received after such date will be answered, if at all, by UC Legal, in its sole discretion. FAQs regarding the University of California 2025-27 HAPDP panel can be found at: [2025-27 HAPDP Panel FAQs](#). You are not authorized to contact any other University employee concerning this RFP. Failure to adhere to this requirement will be grounds for disqualifying your proposal.

Following review of the written proposals, UC Legal may ask firms in which it continues to have an interest to participate in an interview by videoconference. In no event will UC Legal schedule meetings in advance of receipt of your RFP response, and the only meetings UC Legal intends to hold, if any, are with the finalist law firms. In no event should any firm bill any time in connection with the videoconference interview or in preparation of any materials in response to this RFP. If your firm is invited to an interview, only the individuals being proposed to work as part of the Panel should attend. This means, for example, that you should not send an employment lawyer to represent your firm on the HAPDP Panel just because that person happens to have a pre-existing relationship with the University; doing so will be counterproductive. UC Legal also may award a position as a Preferred HAPDP Counsel without further negotiations or discussions or further interviews with any given finalist law firm.

This RFP does not bind UC Legal to any obligations or impose liability for any costs or expenses incurred by your firm in responding to the proposal or traveling to an interview in connection with this RFP. UC Legal, in its sole discretion, may or may not make an award and reserves the right to reject any and all responses received. UC Legal also reserves the right to terminate a retention at any time in its sole discretion.

## Evaluation Criteria

UC Legal will award the matter to the bidder(s) in its sole discretion based upon a combination of experience, expertise, demonstrated commitment to diversity, proposed team, and the greatest overall value.

## Appendices

Appendix A: Health Affairs, Privacy & Data Protection Law Group Master Retention