

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

V.

CIVIL ACTION NO.: 3:16-CV-00622-CWR-FKB

THE STATE OF MISSISSIPPI

DEFENDANT

DECLARATION OF WENDY BAILEY

I, Wendy Bailey, declare as follows:

1. I am an adult United States citizen residing in Rankin County, Mississippi.
2. I am under no legal disability and am competent to testify to the facts set forth below of which I have personal knowledge.
3. I have been employed in various capacities by the Mississippi Department of Mental Health (DMH) since 2005.
4. My current position with DMH is Executive Director.
5. This Declaration summarizes Mississippi's capacity for the community-based services discussed below.

Mobile Crisis Response Teams

6. As of December 31, 2018, Mississippi had fourteen Mobile Crisis Response Teams – one in each Region. Mississippi has and will sustain one Mobile Crisis Team in each Region except Region 12. Region 12 is operating and will sustain two Mobile Crisis Teams – one in Hattiesburg and one in the former Region 13.
7. In FY21, DMH provided an additional \$600,000 for Mobile Crisis Response Teams. This will continue in FY22.

EXHIBIT
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Crisis Stabilization Units

8. As of December 31, 2018, Mississippi had Crisis Stabilization Units (CSU) in eight Regions. Mississippi now has CSUs available for every Region (Region 15 provides access to Crisis Residential Services for Region 15 in neighboring Regions), except Region 11. In FY22, Mississippi will make funds available for a twelve-bed CSU in Region 11 through the Region 11 Community Mental Health Center (CMHC) or another DMH certified provider.

Intensive Community Service – PACT, ICORT, and ICSS

9. Mississippi provides Intensive Community Services through three programs: (i) Program of Assertive Community Treatment (PACT), (ii) Intensive Community Outreach and Recovery Team (ICORT), and (iii) Intensive Community Support Specialists (ICSS).

10. As of December 31, 2018, Mississippi had eight PACT teams. Mississippi now has and will sustain ten PACT teams. Mississippi's PACT teams are located in the Regions shown on Exhibit A (the area that was Region 13 as of December 31, 2018, is now operated by Region 12).

11. As of December 31, 2018, Mississippi had no ICORTs. Mississippi developed and implemented ICORT to deliver Intensive Community Services to less densely populated or rural areas that are difficult to serve with PACT teams.

12. In FY19, DMH piloted ICORT in Region 2 CMHC. As shown on Exhibit A, Mississippi now has provided funding for sixteen ICORTs: one ICORT in Regions 1, 6, 8, 9, and 14, two ICORTS in Regions 2, 7, 10, and 11, and three ICORTs in Region 12.

13. ICSS have direct involvement with the person and attempt to develop a caring, supportive relationship with the person as part of Mississippi's Intensive Community Support Services. In FY21, Regions 3, 6, 9, and 10 each received grants for two additional ICSS.

Region 11 received a grant for four additional ICSS. Mississippi now has provided grant funding for 35 ICSS as shown on Exhibit A.

14. Mississippi has provided grant funding for Intensive Community Services to CMHCs, making PACT, ICORT, and/or ICSS available in every county.

Peer Support

15. As of December 31, 2018, Mississippi had a Peer Bridger program at North Mississippi State Hospital. In FY21, Mississippi added a Peer Bridger program at South Mississippi State Hospital. In FY22, Mississippi will add a Peer Bridger Program at Mississippi State Hospital and East Mississippi State Hospital.

16. Subject to ordinary workforce turnover which could cause the number of Peer Support Specialists to fluctuate from time-to-time, Mississippi now provides and will sustain Peer Support Services in every Region by providing Peer Support Services as a standalone service available at the primary CMHC office in each Region.

Supported Employment

17. In 2015, Mississippi began offering Supported Employment Programs of Individual Placement and Support (IPS) at four pilot sites (Regions 2, 7, 10 and 12).

18. In February 2019, Mississippi offered grants for an Employment Specialist to all remaining CMHCs. Seven of them applied and all were awarded grants (Regions 3, 4, 8, 9, 11, 14 and 15).

19. In 2020, the remaining CMHCs received grants for an Employment Specialist. Mississippi now provides all Regions with a grant to provide Supported Employment through either IPS or an Employment Specialist that partners with Vocational Rehabilitation.


20. In FY22, Mississippi will offer IPS grants to three additional CMHCs (Region 4, 8 and 9).

Supported Housing

21. In FY22, Mississippi will provide an additional \$150,000 to the two CHOICE housing providers to conduct assessments of people discharged from the State Hospitals and CSUs.

22. In FY22, the Mississippi Legislature appropriated to Mississippi Home Corporation an additional \$400,000 for CHOICE housing vouchers.

Executed on April 30, 2021.

DocuSigned by:

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WENDY BAILEY

Intensive Community Supports

Region	Current Status	Proposed Expansion	FY19 State Hospital Acute Psych Admissions	Comments
1	1 ICORT; 1 ICSS	—	49	Existing ICORT serves all counties - Coahoma, Quitman, Tallahatchie, and Tunica. Number of commitments do not require additional intensive community supports.
2	1 ICORT; 1 ICSS	1 ICORT	142	Existing ICORT serves all counties – Tate, Marshall, Panola, Lafayette, Yalobusha, and Calhoun. Number of commitments require an additional ICORT to assist in coverage of counties.
3	1 PACT Team; 1 ICSS	2 ICSSs	114	Existing PACT serves Lee county. Number of commitments require 2 additional ICSSs to serve Benton, Union, Pontotoc, Monroe, and Chickasaw. Existing PACT will begin serving Itawamba.
4	2 PACT Teams; 3 ICSSs	—	148	One existing PACT serves DeSoto county and 1 PACT serves Tippah, Alcorn, Prentiss, and Tishomingo. Number of commitments do not require additional intensive community supports.
6	1 PACT Team; 1 ICORT; 2 ICSSs	2 ICSSs	119	Existing PACT serves Leflore, Grenada and Holmes. Existing ICORT serves Bolivar and Washington. Number of commitments require 2 additional ICSSs to serve remaining counties – Issaquena, Sharkey, Humphreys, Sunflower, Carroll, Montgomery, and Attala.
7	1 ICORT; 2 ICSSs	1 ICORT	147	Existing ICORT serves all counties – Webster, Clay, Choctaw, Oktibbeha, Lowndes, Noxubee, and Winston. Number of commitments require an additional ICORT to assist in coverage of counties.
8	1 PACT Team; 1 ICSS	1 ICORT	145	Existing PACT serves Rankin and Madison. Number of commitments require an ICORT to serve Copiah, Lincoln and Simpson.
9	1 PACT Team; 1 ICSS	1 ICORT and 2 ICSSs	291	Only includes Hinds county. Number of commitments require an ICORT and 2 additional ICSSs.



Intensive Community Supports

10	1 PACT Team; 1.5 ICSS	2 ICORTs and 2 ICSSs	289	Existing PACT serves Lauderdale. Number of commitments requires 2 additional ICORTs to serve Leake, Scott, Newton, Smith and Clarke and 2 ICSSs for Neshoba, Jasper, and Kemper.
11	1 ICORT; 1 ICSS	1 ICORT and 4 ICSSs	250	Existing ICORT serves all counties (not operational yet) – Pike, Amite, Lawrence, Walthall, Franklin, Adam, Wilkinson, Claiborne, and Jefferson. Number of commitments require an additional ICORT and 4 additional ICSSs to assist in coverage of counties.
12	1 PACT Team; 1 ICSS	3 ICORTs	273	Existing PACT serves Forrest and Perry counties. Number of commitments require 3 additional ICORTs to cover Lamar, Pearl River, Marion, Jefferson Davis, Covington, and Jones. Existing ICSS staff will cover Greene and Wayne. Region 12 operates an additional PACT in Region 13 that serves Hancock and Harrison.
13	1 PACT Team; 5 ICSSs	_____	141	Existing PACT operated by Region 12 serves Hancock and Harrison. An ICSS will serve Stone. In the previous year, Region 13 added 4 ICSSs.
14	1 ICORT; 1 ICSS	_____	66	Existing ICORT serves George and Jackson counties. Number of commitments do not require additional intensive community supports.
15	1 PACT; 2 ICSS	_____	34	Existing PACT serves Warren and Yazoo counties. Number of commitments do not require additional intensive community supports.

Types of Intensive Community Supports

Program of Assertive Community Treatment Team (PACT) – Caseload is 80
 Intensive Community Outreach and Recovery Team (ICORT) – Caseload is 45
 Intensive Case Management (ICSS) – Caseload will be 20 as of July 1, 2020

January 19, 2021