

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF MISSISSIPPI,

Defendant.

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

UNITED STATES' RESPONSE TO THE COURT'S ORDER (ECF NO. 253)

The United States submits its Proposed Remedial Plan—attached as Exhibit 1—in accordance with the Court's instructions. ECF No. 253.

1. The Proposed Remedial Plan sets forth provisions to remedy the violations identified in the Court's September 3, 2019 Memorandum Opinion and Order, ECF No. 234. It is firmly rooted in the evidence admitted in the June 2019 trial, and it is appropriately tailored to comply with the requirements for injunctive relief.

2. The Proposed Remedial Plan requires the State to expand its existing core services—Mobile Crisis Teams, Crisis Stabilization Units, Program of Assertive Community Treatment (PACT), Permanent Supported Housing, Supported Employment, Peer Support, and Community Support Services—to prevent unnecessary hospitalizations of adults with serious mental illness.

3. The Proposed Remedial Plan also addresses failures relating to discharge planning, oversight of the core services, and technical assistance to community mental health providers that the Court found contributed to unnecessary hospitalizations.

4. Finally, the Proposed Remedial Plan provides for a Monitor to assess the State's compliance and includes clear termination provisions.

5. For support, the United States submits the attached Memorandum.

Dated: May 20, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2021, I electronically filed the foregoing with the Clerk of Court using the ECF system, which sent notification of such filing to all counsel of record.

/s/ Patrick Holkins

Patrick Holkins