

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
Western Division**

ROSIE D., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
CHARLES BAKER, et al.,	)	C.A. No. 01-30199-MAP
	)	
Defendants	)	
	)	
	)	

**PLAINTIFFS’ MOTION TO IMPROVE ACCESS TO REMEDIAL SERVICES**

In order to facilitate compliance with the parties’ Joint Disengagement Measures, the plaintiffs request that the Court enter an order setting 2018 goals for access to ICC and IHT, and requiring the defendants to expand the capacity of IHT; take specific actions with respect to Community Service Agencies (CSAs) that consistently and substantially fail to adhere to the Medicaid access standard; adopt the piloted and successful payment methodology for Intensive Care Coordination (ICC); increase the rate for In-Home Therapy (IHT); and for other remedial services. In support of this Motion, the plaintiffs submit a Memorandum and proposed Order.

WHEREFORE, the Court should enter the proposed Order attached as Exhibit 1.

RESPECTFULLY SUBMITTED,  
THE PLAINTIFFS,  
BY THEIR ATTORNEYS,

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### **CERTIFICATE OF SERVICE**

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Dated: May 11, 2018

/s/ Steven J. Schwartz