

STATE OF MICHIGAN  
IN THE COURT OF CLAIMS

**NORTHCARE NETWORK MENTAL HEALTH  
CARE ENTITY,  
NORTHERN MICHIGAN REGIONAL ENTITY,  
and  
REGION 10 PIHP**

Case No. 24- 000198 -MZ

Hon. Sima G. Patel

Plaintiffs,

v

**STATE OF MICHIGAN,  
STATE OF MICHIGAN DEPARTMENT OF  
HEALTH AND HUMAN SERVICES, a  
Michigan State Agency, and its Director,  
ELIZABETH HERTEL, in her official capacity,**

Defendants.

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**TAFT, STETTINIUS & HOLLISTER, LLP**

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**12/09/2024 PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

**\*\*\*ORAL ARGUMENT REQUESTED\*\*\***

Plaintiffs, by and through counsel, TAFT, STETTINIUS & HOLLISTER, LLP, for the reasons more particularly described in the accompanying Brief in Support, request that the Court issue a preliminary injunction prohibiting MDHHS from withholding critical Medicaid funding from Plaintiffs. Defendants are withholding the funds in order to try to force Plaintiffs to sign a contract that contains various provisions that violate state and federal law. The consequence of Defendants' withholding of funds is that thousands of citizens are no longer eligible to receive

Substance Abuse Disorder Health Home (“SUDHH”) services. Those individuals are statutorily and constitutionally entitled to receive the services, and the Court should not permit Defendants to put those individuals in the middle of the parties’ dispute.

WHEREFORE, Plaintiffs respectfully request that this Court enter a preliminary injunction prohibiting Defendants from withholding SUDHH funding from Plaintiffs during the pendency of this action.

Respectfully Submitted,

**TAFT, STETTINIUS & HOLLISTER, LLP**

Dated: December 9, 2024

By: /s/Christopher J. Ryan  
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**BRIEF IN SUPPORT**

**INTRODUCTION**

The Court should enjoin Defendants from withholding critical Medicaid funding needed to provide Substance Use Disorder Health Home (“SUDHH”) services to the citizens located within each of the Plaintiffs’ respective regions. Defendants brazenly admit they are only withholding the funds because Plaintiffs refused to sign Defendants’ form FY25 Contract, which contain numerous provisions that violate federal and state law as detailed in Plaintiffs’ Verified Complaint. But the fact remains that regardless of whether the parties’ agree on the form of a FY25 contract, Defendants are legally obligated to provide the funding.

## FACTS

Plaintiffs represent 3 of Michigan’s 10 Prepaid Inpatient Health Plans (“PIHPs”) that facilitate the delivery of behavioral health services for individuals with mental illness developmental disability, and substance use disorders in 40 counties across the State.<sup>1</sup> (Verified Complaint, ¶ 2.)

To say the least, Michigan’s system for funding behavioral health services is complex. After approving a Medicaid State Plan, the State receives federal money to spend on services covered by the Medicaid program, which is administered by the Department of Health and Human Services (“MDHHS”). The State is required to fund 90% of behavioral health services that are not covered under the Medicaid program (MCL 330.1308(1)) and the counties fund the remaining 10%. The actual services (Medicaid and non-Medicaid) are provided at the county level through community mental health services programs (“CMHs”). MCL 330.1116(2)(b). The Legislature recognized the importance of community mental health services programs, mandating that MDHHS “promote and maintain an adequate and appropriate system of community mental health services programs throughout the state” and requiring MDHHS to “financially support...community mental health services programs...” MCL 330.1116(2)(b); MCL 330.1202(1) (“The state shall financial support...community mental health services programs...”); CMHs have the right to organize together to form a “regional entity.” Plaintiffs are all regional entities. Regional entities are public governmental entities separate from the county, authority, or organizations that establish them, but have all of the rights and authority of their constituent CMHs. MCL 330.1204b(3).

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<sup>1</sup> Plaintiff NorthCare Network Mental Health Care Entity is referred to as “NorthCare.” Plaintiff Northern Michigan Regional Entity is referred to as “NMRE.” Plaintiff Region 10 PIHP is referred to as “Region 10.”

The State of Michigan is divided into 10 PIHPs, and Plaintiffs constitute 3 of those PIHPs. (Verified Complaint, ¶ 37.) After the State receives Medicaid money from the federal government, the State then distributes those funds on a capitated basis to the 10 PIHPs, who fund the CMHs and the services they provide. MCL 330.1232b requires that the condition for contracting and receiving Medicaid dollars is that a PIHP shall certify that (a) it is in substantial compliance with the standards promulgated by the department and with applicable federal regulations, and (b) that the PIHP has established policies and procedures to monitor compliance with the standards promulgated by the department and with applicable federal regulations and to ensure program integrity. MCL 330.1232b(2). Each Plaintiff has done so. (Verified Complaint, ¶ 39.)

On an annual basis, MDHHS is required to review the PIHPs to ensure compliance with promulgated standards and federal regulations. MCL 330.1232b(3). MDHHS may also review a PIHP in response to beneficiary complaints, financial status considerations, or for health and safety concerns. MCL 330.1232b(4). However, MDHHS may only sanction or terminate a PIHP if the PIHP is not in substantial compliance with promulgated standards and with established federal regulations, if the PIHP has misrepresented or falsified information reported to the state or federal government, or if the PIHP has failed substantially to provide necessary covered services to recipients. MCL 330.1232b(5). None of the Plaintiffs have done so. (Verified Complaint, ¶ 40.) Moreover, prior to imposing a sanction or terminating a relationship with a PIHP, MDHHS is required to provide notice explaining the basis and nature of the sanction, as well as an opportunity to contest the department's findings prior to imposition of the sanction via a hearing in accordance with the Administrative Procedures Act, MCL 24.201 et seq.

One of the programs offered through Plaintiffs is the SUDHH Program. (Verified Complaint, ¶¶ 111-115.) The SUDHH Program is a Medicaid program designed to “provide

comprehensive care management and coordination services to Medicaid beneficiaries” with opioid use disorder (“OUD”), alcohol use disorder (“AUD”), and stimulant use disorder (“StUD”).<sup>2</sup> The program previously only existed for individuals with OUD and was known as the Opioid Health Home program (“OHH”). (Verified Complaint, ¶ 111.) Michigan, with the approval of CMS, expanded the program to include AUD and StUD, and thus, OHH became SUDHH. *Id.*

The parties have been embroiled in a lengthy and contentious negotiation for many months over the terms of a new contract for FY25. (Verified Complaint, ¶¶ 45-46.) Plaintiffs maintain that certain provisions in Defendants’ form FY25 Contract (“FY25 Contract” – Exhibit A to Verified Complaint) are unreasonable and violate state/federal law. (*Id.*) Plaintiffs each signed the FY25 Contract after redlining the unreasonable and illegal provisions, but MDHHS refused to counter-sign. (Verified Complaint, ¶ 46.) In an attempt to bully Plaintiffs to agree to MDHHS’s version of the FY25 Contract, MDHHS threatened that if Plaintiffs did not sign by October 31, 2024, MDHHS would terminate its relationship with Plaintiffs and cut off the funding Plaintiffs need to ensure recipients in their respective regions continue to receive behavioral health services. (Verified Complaint, ¶ 47.)

On Wednesday, November 27, 2024, MDHHS executed on its threat by informing Plaintiffs that because they refused to sign the FY25 Contract, MDHHS was going to withhold Medicaid funds needed to provide SUDHH benefits to recipients:

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<sup>2</sup><https://www.michigan.gov/mdhhs/assistance-programs/medicaid/substance-use-disorder-health-home> (last accessed December 5, 2024).

I apologize that we didn't make this connection sooner, but without a signed Medicaid contract Northcare is not able to implement the SUDHH with Medicaid funds. You can continue with OHH activities and any billable services for those with AUD or StUD, but those SUDHH beneficiaries will have to be removed from the WSA. Please work with Kelsey to get the beneficiary list updated.

(Verified Complaint, ¶ 112.)

NMRE and Region 10 received substantively the same email as was received by NorthCare.

(Verified Complaint, ¶ 113.)

While Defendants' negotiation tactic will harm Plaintiffs, the most significant harm will come to the citizens entitled to receive SUDHH services. (Verified Complaint, ¶¶ 113-115.)

Defendants' pronouncement means that all of the individuals currently enrolled to receive SUDHH benefits will no longer receive them. *Id.* And it means that the thousands upon thousands of Michiganders who are eligible to enroll to receive SUDHH services will no longer be eligible to enroll. *Id.* Those residents were already directed by Defendants to contact Plaintiffs (see, e.g., Exhibit A) to obtain SUDHH services, and now Plaintiffs are being directed to turn them away. (*Id.*, ¶¶ 112-113.)

### ARGUMENT

MCR 3.310(A) gives the Court authority to issue an order to show cause why a preliminary injunction should not be issued. "In determining whether to issue a preliminary injunction, a court must consider four factors: (1) harm to the public interest if the injunction issues; (2) whether harm to the applicant in the absence of temporary relief outweighs the harm to the opposing party if relief is granted; (3) the likelihood that the applicant will prevail on the merits; and (4) a demonstration that the applicant will suffer irreparable injury if the relief is not granted." *Thermatoool Corp v Borzym*, 227 Mich App 366, 376; 575 NW2d 334 (1998). These factors "guide the discretion of the court; they are not meant to be rigid and unbending requirements." *Johnson v Michigan Minority Purchasing Counsel*, 341 Mich App 1, 25; 988 NW2d 800 (2022).

**I. The public interest favors entering an injunction, and thousands of Michigan residents will suffer irreparable harm without injunctive relief.**

The first and fourth factors strongly favor issuing an injunction that prohibits MDHHS from withholding Medicaid funds needed to provide medical services to citizens of Michigan.

There is no dispute that the services provided via the SUDHH program are critical to those with substance abuse disorders. MDHHS's website extols the numerous benefits of the program:

- **Background**

Under Section 2703 of the Patient Protection and Affordable Care Act of 2010 (ACA), the Health Home service model is meant to help chronically ill Medicaid and Healthy Michigan Plan beneficiaries manage their conditions through an intensive level of care management and coordination. The Substance Use Disorder Health Home is centered on whole-person, team-based care, with peer recovery coaches at the center of care.

- **Program Overview**

The SUDHH will provide comprehensive care management and coordination services to Medicaid beneficiaries with opioid use disorder. For enrolled beneficiaries, the SUDHH will function as the central point of contact for directing patient-centered care across the broader health care system. Beneficiaries will work with an interdisciplinary team of providers to develop an individualized recovery care plan to best manage their care. The model will also elevate the role and importance of peer recovery coaches and community health workers to foster direct empathy and connection to improve overall health and wellness. In doing so, this will attend to a beneficiary's complete health and social needs. Participation is voluntary, and enrolled beneficiaries may opt out at any time.

Substance Use Disorder Health Home receives reimbursement for providing the following federally mandated core services:

- Comprehensive care management
- Care coordination
- Health promotion
- Comprehensive transitional care
- Individual and family support
- Referral to community and social support services

- **Program Objectives**

Substance Use Disorder Health Home providers are also required to utilize health information technology to coordinate the care of Substance Use Disorder Health

Home patients. Through the delivery of the core health homes services, Substance Use Disorder Health Home has the following objectives:

- Improve patient outcomes and long-term recovery
- Provide efficient, coordinated, and integrated behavioral and physical healthcare
- Increase access to healthcare
- Increase hospital post-discharge follow up
- Create a continuum of care
- Reduce healthcare costs
- Reduce unnecessary hospital admissions and readmissions
- Reduce unnecessary emergency room visits
- Increase the use of health information technology

<https://www.michigan.gov/mdhhs/assistance-programs/medicaid/substance-use-disorder-health-home> (last accessed December 5, 2024).

To help qualifying individuals obtain SUDHH benefits, MDHHS published a directory that instructs individuals who to call to obtain services depending on where the individual resides. For those individuals residing in the 40 counties represented by the Plaintiffs, citizens were directed by MDHHS to contact Plaintiffs. Exhibit A.

While not all individuals who are eligible for Medicaid are eligible for SUDHH benefits (the benefits are only available to those with OUD, AUD, and StUD diagnoses), the number of eligible individuals in the regions served by Plaintiffs is not slight:

| <u>Region</u> | <u>Individuals Eligible for SUDHH</u> |
|---------------|---------------------------------------|
| NorthCare     | 4,080                                 |
| NMRE          | 7,886                                 |
| Region 10     | 19,039                                |
| <b>Total</b>  | <b>31,005</b>                         |

(Verified Complaint, ¶ 114.)

Plaintiffs have already taken substantial steps and expended resources in reliance on receiving the funds necessary to provide SUDHH services. But the harm to Plaintiffs pales in comparison to the harm that would come to the 31,000+ individuals served by Plaintiffs that are eligible to receive SUDHH services. (Verified Complaint, ¶¶ 114-115.) It is harm to imagine a



better example of irreparable harm than depriving individuals of medical services, especially those services needed by persons in crisis or attempting to overcome addiction; numerous courts have held as much. See, e.g., *Cole v Arvin Meritor, Inc.*, 516 F Supp 2d 850, 876 (ED Mich, 2005) (“Alteration and elimination of retiree health benefits causes retirees and dependents health risk, uncertainty, anxiety, financial hardship, and other irreparable harm.”); *Detroit Police Officers Ass'n v City of Detroit*, 142 Mich App 248, 253; 369 NW2d 480 (1985) (“Forced deferral of medical treatment may cause irreparable harm.”); *Welch v Brown*, 935 F Supp 2d 875, 888 (ED Mich, 2013) (irreparable harm found where access to health care may be threatened by modification to health care benefits); *Markva v Haveman*, 168 F Supp 2d 695, 719 (ED Mich, 2001), aff'd 317 F3d 547 (CA 6, 2003) (“denial or delay in benefits which effectively prevents plaintiffs from obtaining needed medical care constitutes irreparable harm.”)

**II. Harm to Plaintiff without an injunction outweighs harm to Defendants if an injunction is issued.**

The only harm that Defendants will sustain if an injunction is issued is that they will lose what they believe is leverage over Plaintiffs. But that is not the type of harm that this Court should take into account when deciding whether to issue an injunction. On the other hand, as stated above, Plaintiffs (and more importantly, the citizens Plaintiffs serve) will be significantly harmed, because without an injunction, the entire SUDHH program in 40 counties across the State will disappear. (Verified Complaint, ¶¶ 111-115.)

**III. Plaintiff is likely to prevail on the merits.**

Plaintiff's Verified Complaint outlines the myriad provisions of the State's proposed FY25 contract that violate state and federal law. (Verified Complaint.) More importantly to this Motion, Plaintiff is likely to prevail on its claim that the State has a statutory duty to continue funding Plaintiffs, even in the absence of a signed contract. (Verified Complaint, Counts V and VI.)

Defendants have a non-discretionary statutory duty to provide funding to Plaintiffs. As indicated above, Plaintiffs are regional entities. (Verified Complaint, ¶ 28.) Regional entities have all of the “power, privilege, or authority that the participating community mental health services programs share in common and may exercise separately under the act....” MCL 330.1204b(2). The State is statutorily required to provide funding to CMHs: “The state shall financially support...community mental health services programs....” MCL 330.1116(2)(b). Moreover, MDHHS is required to provide Medicaid specialty services and supports services through PIHPs. MCL 400.109f (“Medicaid-covered specialty services and supports shall be managed and delivered by specialty prepaid health plans...”).

Not only are Defendants required to provide Medicaid funding to Plaintiffs, MCL 330.1232b sets forth the only conditions precedent necessary to receive that funding. Specifically, MCL 330.1232b requires that as a condition for receiving Medicaid funding, a PIHP shall certify that (a) it is in substantial compliance with the standards promulgated by the department and with applicable federal regulations, and (b) that the PIHP has established policies and procedures to monitor compliance with the standards promulgated by the department and with applicable federal regulations and to ensure program integrity. There is no question that each Plaintiff has done so. (Verified Complaint, ¶ 39.)

The same statute also sets forth the restrictions on Defendants’ ability to terminate Medicaid funding. MDHHS may only sanction or terminate a PIHP if the PIHP is not in substantial compliance with promulgated standards and with established federal regulations, if the PIHP has misrepresented or falsified information reported to the state of the federal government, or if the PIHP has failed substantially to provide necessary covered services to recipients. There is no question that none of the Plaintiffs have done so. (Verified Complaint, ¶ 40.)

Moreover, according to the Mental Health Code, before terminating a PIHP, MDHHS is required to provide that PIHP with notice of the basis and nature of the sanction and an opportunity for hearing to contest or dispute MDHHS's findings and intended sanction. MCL 330.1232b. There is no question that Defendants have failed to comply with the requirements of MCL 300.1232b, and are instead simply cutting off SUDHH Medicaid funding without any prior notice as a means of trying to force Plaintiffs to sign Defendants' form FY25 Contract. (Verified Complaint, ¶¶ 47 & 112.)

Thus, Plaintiffs are likely to succeed on the merits of their claim that the State is prohibited from withholding Medicaid funding.

### **CONCLUSION**

The parties disagree on a lot, as outlined in Plaintiffs' Verified Complaint requesting declaratory relief. However, as public entities intended to serve Michiganders, the parties should not disagree over whether the citizens of the State should receive necessary services. By cutting off SUDHH Medicaid funding, Defendants thrust individual Medicaid beneficiaries, and the ability of those beneficiaries to receive SUDHH services, into the middle of the parties' dispute. The Court should enjoin this conduct, and ensure that services are not disrupted through Defendants' wrongful withholding of Medicaid funds.

### **TAFT, STETTINIUS & HOLLISTER, LLP**

Dated: December 9, 2024

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# Exhibit A

**Substance Use Disorder Health Home (SUDHH) – PIHP and Designated Providers**

**Prepaid Inpatient Health Plan (PIHP)**

- [NorthCare Network](#)

**Address: 1230 Wilson St.**

City: Marquette

State: MI

Zip: 49855

Phone: 1-800-305-6564

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name                                      | Locations                 | City             | Phone         |
|--|---------------------------|------------------|---------------|
| <a href="#">Great Lakes Recovery Center</a>            | 1009 W. Ridge St. Suite C | Marquette        | 906-228-6545  |
|  | 1101 Ludington Street     | Escanaba         | 906-789-3528  |
|  | 100 Malton Road Suite 7   | Negaunee         | 906-485-2347  |
|  | 1115 S. Hemlock Street    | Iron Mountain    | 906- 774-2561 |
|  | 2655 Ashmun St. - South   | Sault Ste. Marie | 906-632-9809  |
| <a href="#">Upper Great Lakes Family Health Center</a> | 1414 W Fair Ave Suite 242 | Marquette        | 906-449-2900  |
|  | 56720 Calumet Avenue      | Calumet          | 906-483-1177  |

**Opioid Treatment Program (OTP)**

| OHH Provider Name                                  | Locations      | City       | Phone        |
|--|----------------|------------|--------------|
| <a href="#">Sacred Heart Rehabilitation Center</a> | 248 Ferry Lane | St. Ignace | 906-984-2080 |

**Health Home Partners**

| OHH Provider Name  | Locations                    | City     | Phone       |
|--|------------------------------|----------|-------------|
| <a href="#">Catholic Social Services of the U.P Escanaba</a> | 1100 Ludington St. Suite 401 | Escanaba | 906-7867212 |

**Prepaid Inpatient Health Plan (PIHP)**

- [Northern Michigan Regional Entity](#)

**Address: 1999 Walden Drive**

City: Gaylord

State: MI

Zip: 49735

Phone: 800-834-3393

Email: [support@nmre.org](mailto:support@nmre.org)

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name                    | Locations             | City      | Phone        |
|--------------------------------------|-----------------------|-----------|--------------|
| <a href="#">Alcona Health Center</a> | 1185 US 23 North      | Alpena    | 989-356-4049 |
|                                      | 740 South Main Street | Cheboygan | 231-627-7118 |

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|   |                                    |                |              |
|---|------------------------------------|----------------|--------------|
|   | 3434 M-119, Suite C                | Harbor Springs | 231-348-9900 |
|   | 205 North State Street, Suite A    | Harrisville    | 989-724-5655 |
|   | 6135 Cressey Street                | Indian River   | 231-238-8908 |
|   | 177 N. Barlow Road                 | Lincoln        | 989-736-8157 |
|   | 5671 N. Skeel Avenue               | Oscoda         | 989-739-2550 |
|   | 1175 US 23 South                   | Ossineke       | 989-471-2156 |
|   | 421 Stimpson Drive                 | Pellston       | 231-844-3051 |
| <a href="#">Bear River Health</a>                     | 1619 W. M-32                       | Gaylord        | 231-751-0070 |
|   | 2594 Springvale Road               | Boyne Falls    | 231-535-2822 |
|   | 2329 Center Street                 | Boyne Falls    | 231-535-2822 |
|   | 8446 M-119 Plaza                   | Harbor Spring  | 231-751-0070 |
|   | 218 Water Street                   | Cheboygan      | 231-751-0070 |
|   | 101 Hurlbut                        | Charlevoix     | 231-758-2551 |
| <a href="#">Centra Wellness Network</a>               | 6051 Frankfort Highway, Suite 800  | Benzonia       | 877-398-2013 |
|   | 2198 US Highway 31 South           | Manistee       | 877-3982013  |
| <a href="#">Harbor Hall</a>                           | 2236 E. Mitchell Road              | Petoskey       | 231-347-9880 |
|   | 520 N. Main Suite 202              | Cheboygan      | 231-597-9235 |
| <a href="#">Addiction Treatment Services</a>          | 1010 S. Garfield Avenue            | Traverse City  | 231-346-5207 |
| <a href="#">Thunder Bay Community Health Services</a> | 11899 M-32                         | Atlanta        | 989-785-4855 |
|   | 15774 State Street                 | Hillman        | 989-742-4583 |
|   | 21258 West M-68                    | Onaway         | 989-733-2082 |
|   | 205 South Bradley                  | Rogers City    | 989-734-2052 |
| <a href="#">Traverse Health Clinic</a>                | 1719 South Garfield Avenue         | Traverse City  | 231-935-0799 |
| <a href="#">MidMichigan Community Health Services</a> | 9249 West Lake City Rd             | Houghton Lake  | 989-422-5689 |
|   | 565 Progress Street                | West Branch    | 989-422-5689 |
| Best Medical  | 814 S Garfield Ave Suite C         | Traverse City  | 231-675-4808 |
| <a href="#">Grand Traverse Women's Clinic</a>         | 1200 6 <sup>th</sup> St. Suite 400 | Traverse City  | 231-392-0650 |

**Health Home Partners: Opioid Treatment Program (OTP)**

| OHH Provider Name                     | Locations    | City    | Phone        |
|---------------------------------------|--------------|---------|--------------|
| <a href="#">NMSAS Recovery Center</a> | 2136 W. M-32 | Gaylord | 989-732-1791 |

**Health Home Partners**

| OHH Provider Name                       | Locations                          | City          | Phone        |
|---|------------------------------------|---------------|--------------|
| <a href="#">Catholic Human Services</a> | 1000 Hastings Street.              | Traverse City | 231-470-8110 |
|   | 154 S. Ripley Blvd.                | Alpena        | 989-356-6385 |
|   | 829 W. Main Street                 | Gaylord       | 989-732-6761 |
|   | 106 Fifth Street                   | Harrisville   | 989-356-6385 |
|   | 205 S. Bradley Hwy, Parkwood Plaza | Rogers City   | 989-356-6385 |
|   | 11899 M-32                         | Atlanta       | 989-356-6385 |

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|  |                           |               |               |
|--|---------------------------|---------------|---------------|
|  | 200 Hemlock Road          | Tawas City    | 989-356-6385  |
|  | 3440 West M-76            | West Branch   | 9889-732-6761 |
|  | 209 W. 8th Street         | Mio           | 989-732-6761  |
|  | 421 South Mitchell Street | Cadillac      | 231-775-6581  |
|  | 6051 Frankfort Highway    | Benzonia      | 231-775-6581  |
|  | 205 Grove Street          | Mancelona     | 989-732-6761  |
|  | 2198 US 31 South          | Manistee      | 231-775-6581  |
|  | 206 Health Parkway        | Houghton Lake | 989-732-6761  |

**Prepaid Inpatient Health Plan (PIHP)**

- [Lakeshore Regional Entity](#)

**Address: 5000 Hakes Dr.**

City: Norton Shore

State: MI

Zip: 49441

Phone: 231-769-2050

Email: [customerservice@lsre.org](mailto:customerservice@lsre.org)

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name       | Locations              | City    | Phone        |
|-------------------------|------------------------|---------|--------------|
| Ottawa County Community | 12251 James St Ste 100 | Holland | 616-392-1873 |

**Prepaid Inpatient Health Plan (PIHP)**

- [Southwest Michigan Behavioral Health](#)

**Address: 5250 Lovers Lane Suite 200**

City: Portage

State: MI

Zip: 49002

Phone: 1-800-676-0423

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name  | Locations             | City         | Phone        |
|--|-----------------------|--------------|--------------|
| <a href="#">Calhoun County Community Mental Health Authority dba Summit Pointe</a> | 3630 S Capital Ave SW | Battle Creek | 269-979-8333 |

**Health Home Partners: Opioid Treatment Program (OTP)**

| OHH Provider Name                                 | Locations              | City          | Phone        |
|---|------------------------|---------------|--------------|
| <a href="#">Victory Clinic - Calhoun County</a>   | 842 E. Columbia Street | Battle Creek  | 269-753-1710 |
| <a href="#">Victory Clinic - Kalamazoo County</a> | 401 Howard Street      | Kalamazoo     | 269-344-4458 |
| <a href="#">Harbortown Treatment Center</a>       | 1022 E Main Street     | Benton Harbor | 269-926-0015 |
|   | 3134 Niles Rd C        | St. Joseph    | 269-408-8235 |

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**Prepaid Inpatient Health Plan (PIHP)**

- [Mid-State Health Network](#)

**Address: 530 West Ionia Street Suite F**

City: Lansing

State: MI

Zip: 48933

Phone: 517-253-7525

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name                                     | Locations            | City          | Phone        |
|---|----------------------|---------------|--------------|
| <a href="#">Recovery Pathways</a>                     | 1009 Washington Ave. | Bay City      | 989-928-3566 |
| <a href="#">MidMichigan Community Health Services</a> | 9249 W Lake Road     | Houghton Lake | 989-422-5122 |

**Health Home Partners: Office Based Opioid Treatment Providers (OTPs)**

| OHH Provider Name              | Locations         | City    | Phone        |
|--------------------------------|-------------------|---------|--------------|
| <a href="#">Victory Clinic</a> | 508 Shattuck Road | Saginaw | 989-752-7867 |
|                                | 3300 Lansing Ave  | Jackson | 517-784-2929 |
|                                | 4902 S Cedar St.  | Lansing | 517-394-7867 |

**Prepaid Inpatient Health Plan (PIHP)**

- [C.M.H Partnership of Southeast Michigan](#)

**Address: 3005 Boardwalk Dr. Suite #200**

City: Ann Arbor

State: MI

Zip: 48108

Phone: 1-855-571-021

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name                                  | Locations                  | City       | Phone          |
|--|----------------------------|------------|----------------|
| <a href="#">Packard Health</a>                     | 2650 Carpenter Rd          | Ann Arbor  | 734-971-1073   |
|  | 200 Arnet St. Suite 150    | Ypsilanti  | 734-985-7200   |
| <a href="#">Passion of the Mind Healing Center</a> | 14930 Laplaignance Rd #127 | Monroe     | 734-344-5269   |
| <a href="#">Family Medical Center of Michigan</a>  | 8765 Lewis Avenue          | Temperance | 734-654-2169   |
|  | 1200 N. Main St.           | Adrian     | (517) 263-1800 |
|  | 130 Medical Center Dr.     | Carleton   | (734) 654-2169 |
|  | 901 N. Macomb              | Monroe     | (734) 654-2169 |

**Health Home Partners: Opioid Treatment Program (OTP)**

| OHH Provider Name            | Locations                     | City        | Phone        |
|------------------------------|-------------------------------|-------------|--------------|
| <a href="#">Therapeutics</a> | 4673 Washtenaw Avenue         | Ann Arbor   | 734-547-5009 |
|                              | 1010 E. West Maple, Suite 200 | Walled Lake | 248-525-6832 |
|                              | 3250 N. Monroe St. Suite 2    | Monroe      | 734-384-3121 |

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**Prepaid Inpatient Health Plan (PIHP)**

- [Detroit Wayne Integrated Health Network](#)

Address: 707 W. Milwaukee Ave.

City: Detroit,

State: MI

Phone: 800-630-1044

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name                   | Locations               | City      | Phone        |
|-------------------------------------|-------------------------|-----------|--------------|
| <a href="#">Hegira Health Inc.</a>  | 8623 N Wayne Rd Ste 200 | Westland  | 734-425-0636 |
| <a href="#">The Guidance Center</a> | 13101 Allen Rd.         | Southgate | 989-734-2052 |

**Health Home Partners: Opioid Treatment Program (OTP)**

| OHH Provider Name                               | Locations             | City          | Phone          |
|---|-----------------------|---------------|----------------|
| <a href="#">Metro East Drug Treatment Corp.</a> | 13929 Harper Ave.     | Detroit       | 313-371-0055   |
| <a href="#">New Light Recovery</a>              | 300 West McNicols     | Detroit       | 313-867-8015   |
| <a href="#">Quality Behavioral Health Inc.</a>  | 6821 Medbury          | Detroit       | (313) 922-2222 |
| <a href="#">Star Center Inc.</a>                | 13575 Lesure          | Detroit       | (313) 493-4410 |
| <a href="#">Nardin Park Recovery Center</a>     | 9605 Grand River Ave. | Detroit       | 313-834-5930   |
| <a href="#">Rainbow Center</a>                  | 12501 Hamilton Ave.   | Highland Park | 313-865-1580   |
| <a href="#">Sobriety House</a>                  | 2081 W. Grand Blvd.   | Detroit       | 231-935-0799   |

**Prepaid Inpatient Health Plan (PIHP)**

- [Oakland Community Health Network](#)

Address: 5505 Corporate Drive

City: Troy

State: MI

Zip: 48098

Phone: 248-858-1210

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name                       | Locations                        | City       | Phone        |
|---|----------------------------------|------------|--------------|
| <a href="#">Meridian Health</a>         | 269 Summit Drive                 | Waterford  | 248-599-8999 |
| <a href="#">Easter Seals</a>            | 24445 Northwestern Hwy suite 100 | Southfield | 248-475-6400 |
| <a href="#">Oakland Family Services</a> | 114 Orchard Lake Road            | Pontiac    | 248-858-7766 |

**Health Home Partners: Opioid Treatment Program (OTP)**

| OHH Provider Name                                  | Locations                | City         | Phone          |
|--|--------------------------|--------------|----------------|
| <a href="#">Therapeutics</a>                       | 1685 Baldwin Ave Ste 400 | Pontiac      | (248) 977-3758 |
| <a href="#">Sacred Heart Rehabilitation Center</a> | 28303 Dequindre Road     | Madison Hts. | 248-658-1116   |

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**Prepaid Inpatient Health Plan (PIHP)**

- [Macomb County C.M.H Services](#)

Address: 22550 Hall Road  
 City: Clinton Township  
 State: MI  
 Zip: 48036  
 Phone: 1-855-996-2264

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name                    | Locations           | City       | Phone        |
|--------------------------------------|---------------------|------------|--------------|
| <a href="#">Gammons Medical</a>      | 28477 Hoover        | Warren     | 586-250-4040 |
|                                      | 1223 Washington Ave | Royal Oak  | 248-439-1060 |
| <a href="#">MyCare Health Center</a> | 18 Market St # C,   | Mt Clemens | 586-783-2222 |

**Health Home Partners: Opioid Treatment Program (OTP)**

| OHH Provider Name                                  | Locations            | City             | Phone        |
|--|----------------------|------------------|--------------|
| <a href="#">Bio Med Behavioral Healthcare</a>      | 31581 Gratiot Road   | Roseville        | 586-783-4802 |
| <a href="#">Sacred Heart Rehabilitation Center</a> | 19611 E. 8 Mile Road | St. Clair Shores | 586-541-9550 |
|  | 400 Stoddard Road    | Richmond         | 810-392-2167 |
|  | 28303 Dequindre Road | Madison Hts.     | 248-658-1116 |
| <a href="#">Quality Behavioral Health</a>          | 37490 Dequindre Road | Sterling Heights | 586-480-1438 |

**Health Home Partners**

| OHH Provider Name             | Locations             | City   | Phone        |
|-------------------------------|-----------------------|--------|--------------|
| <a href="#">Judson Center</a> | 12200 13 Mile Rd #200 | Warren | 586-573-1810 |

**Prepaid Inpatient Health Plan (PIHP)**

- [Region 10 PIHP](#)

Address: 3111 Electric Avenue, Suite A  
 City: Port Huron  
 State: MI  
 Zip: 48060  
 Phone: 810-966-3399

**Health Home Partners: Office Based Substance Use Treatment Service Providers**

| OHH Provider Name         | Locations         | City  | Phone        |
|---------------------------|-------------------|-------|--------------|
| <a href="#">New Paths</a> | 765 East Hamilton | Flint | 810-233-5340 |

**Health Home Partners: Opioid Treatment Providers (OTP)**

| OHH Provider Name                                  | Locations                       | City       | Phone        |
|--|---------------------------------|------------|--------------|
| <a href="#">Sacred Heart Rehabilitation Center</a> | 2091 Professional Drive Ste. D. | Flint      | 810-732-1652 |
|  | 400 Stoddard Road               | Richmond   | 810-392-2167 |
|  | 1406 8 <sup>th</sup> Street     | Port Huron | 810-987-1258 |
| <a href="#">Bio Med Behavioral Healthcare</a>      | 1044 Gilbert St                 | Flint      | 586-783-4802 |
|  | 31582 Gratiot Ave               | Roseville  | 586-783-4802 |

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|   |                      |       |              |
|---|----------------------|-------|--------------|
| <a href="#">Arbor Recovery Michigan</a> | 5085 W. Bristol Road | Flint | 810-243-5085 |
|---|----------------------|-------|--------------|

**Health Home Partners**

| OHH Provider Name                   | Locations      | City  | Phone        |
|-------------------------------------|----------------|-------|--------------|
| <a href="#">Flint Odyssey House</a> | 1108 Lapeer Rd | Flint | 810-232-7919 |

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STATE OF MICHIGAN  
COURT OF CLAIMS

**Bundle Cover Sheet**

|                     |                  |                                  |
|---------------------|------------------|----------------------------------|
| <b>Lower Court:</b> | <b>L Ct No.:</b> | <b>COC No.:</b><br>TEMP-ESG0XVRC |
|---------------------|------------------|----------------------------------|

**Case Title:**  
NORTHCARE NETWORK MENTAL HEALTH CARE ENT v. STATE OF MICHIGAN

|                          |                                    |
|--------------------------|------------------------------------|
| <b>Priority:</b><br>NONE | <b>Filing Option:</b><br>File Only |
|--------------------------|------------------------------------|

*Filer Information*

|   |   |
|---|---|
| <u>Filer</u><br>Christopher Ryan<br>27777 Franklin Road<br>Southfield, MI 48034-8222<br><br>cryan@taftlaw.com | <u>Attorney</u><br>Christopher Ryan, 74053(MI)<br>27777 Franklin Road<br>Southfield, MI 48034-8222<br><br>cryan@taftlaw.com |
|---|---|

*Filing Summary*

| <b>Filing Type</b>                                   | <b>Filing Name</b>                              | <b>Fee</b>      |
|--|---|-----------------|
| Summons and Complaint                                | Summons and Complaint with Exhibits             | \$150.00        |
|  | eFiling System Fee:                             | \$25.00         |
| Motion (filed with another document requiring a fee) | Motion for Preliminary Injunction with Exhibits | \$0.00          |
|  | NON-REFUNDABLE Automated Payment Service Fee:   | \$5.25          |
|  | <b>Total:</b>                                   | <b>\$180.25</b> |

Alternate Payment Reason: None

The document(s) listed above were electronically filed with the Michigan Court of Claims.

TEMP-ESG0XVRC-46125958

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