

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

**Ramon, by and through next friend, G.C.; Thomas, by and through next friend, C.G.; Cameron, by and through next friend, B.E.; Anthony; and Wendy, on behalf of themselves and those similarly situated v. Juliet Charron, in her official capacity as Director, Idaho Department of Health and Welfare; Sasha O’Connell, in her official capacity as Deputy Director, Idaho Department of Health and Welfare; and Ross Edmunds, in his official capacity as Administrator, Division of Behavioral Health**

Case No. 1:25-cv-00676-AKB (D. Idaho Jan. 5, 2026) · No. 1:25-cv-00676-AKB · Decided January 5, 2026

SUMMARY

The United States District Court for the District of Idaho considers Plaintiffs’ renewed motion for a temporary restraining order and preliminary injunction, as well as a motion for class certification, challenging Idaho’s decision to change Medicaid reimbursement for Assertive Community Treatment services from bundled to unbundled billing. The court analyzes the claims under Title II of the Americans with Disabilities Act and the Rehabilitation Act, including the Olmstead integration mandate and the risk of institutionalization. Based on the record described, the court denies preliminary injunctive relief and denies class certification without prejudice.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                     |
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| COURT                 | United States District Court for the District of Idaho                                                                                                                                                                                                                                                              |
| WRITING FOR THE COURT | Amanda K. Brailsford                                                                                                                                                                                                                                                                                                |
| JURISDICTION          | United States District Court for the District of Idaho                                                                                                                                                                                                                                                              |
| DECIDED               | January 5, 2026                                                                                                                                                                                                                                                                                                     |
| DOCKET                | 1:25-cv-00676-AKB                                                                                                                                                                                                                                                                                                   |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                               |
| PROCEDURAL POSTURE    | Plaintiffs moved for a renewed temporary restraining order and preliminary injunction requiring Idaho officials to continue providing bundled Assertive Community Treatment services, and later moved for class certification. The court denied injunctive relief and denied class certification without prejudice. |

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| <b>STANDARD OF REVIEW</b> | A preliminary injunction requires a clear showing that the plaintiff is likely to succeed on the merits, likely to suffer irreparable harm, that the balance of equities tips in the plaintiff's favor, and that an injunction is in the public interest. The court may apply the Ninth Circuit's sliding-scale approach. Class certification requires an affirmative showing of Rule 23(a)'s numerosity, commonality, typicality, and adequacy requirements, evaluated through a rigorous analysis. |
| <b>PRECEDENTIAL VALUE</b> | Unpublished district-court memorandum decision and order; persuasive value only.                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>PARTIES</b>            | Ramon, by and through next friend, G.C., Thomas, by and through next friend, C.G., Cameron, by and through next friend, B.E., Anthony, Wendy, on behalf of themselves and those similarly situated v. Juliet Charron, in her official capacity as Director, Idaho Department of Health and Welfare, Sasha O'Connell, in her official capacity as Deputy Director, Idaho Department of Health and Welfare, Ross Edmunds, in his official capacity as Administrator, Division of Behavioral Health     |

## TOPICS

injunctions

ada / disability

public accommodations discrimination

class actions

civil procedure

## PRACTICE AREAS

Civil rights

Disability discrimination

Federal courts

Health law

Equitable remedies

## QUESTIONS PRESENTED

1. Whether plaintiffs made the clear showing required for a preliminary injunction against Idaho officials based on alleged violations of Title II of the ADA and the Rehabilitation Act.
2. Whether plaintiffs demonstrated a likelihood of success on their claim that changing ACT reimbursement from bundled to unbundled billing denied them public benefits or discriminated against them because of disability.
3. Whether plaintiffs demonstrated irreparable harm, favorable equities, and a public interest supporting preliminary injunctive relief.
4. Whether the court should certify plaintiffs' proposed class under Federal Rule of Civil Procedure 23.

## HOLDINGS

1. Plaintiffs were not entitled to preliminary injunctive relief because they failed to make a clear showing of likelihood of success on the merits, irreparable harm, and the other required injunction factors.

2. Plaintiffs failed to establish a likelihood of success on the merits because they did not clearly show that unbundling ACT services denied them comparable public benefits or that defendants' action unlawfully discriminated because of disability.
3. Defendants were likely to succeed on their fundamental-alteration defense because restoring bundled ACT services would require Idaho to reduce or eliminate services for other mentally disabled individuals, and plaintiffs did not refute that showing.
4. The motion for class certification was denied without prejudice because the court did not need to decide class-certification issues after denying injunctive relief, and the present record raised substantial concerns about adequacy, individualized inquiries, and regional representation.

#### KEY QUOTATIONS

*“A preliminary injunction is an extraordinary remedy never awarded as of right.”*

*“Plaintiffs have failed to make a clear showing they are entitled to injunctive relief”*

*“Accordingly, for purposes of injunctive relief, the Court concludes that IDHW has shown they are likely to succeed on their fundamental alteration defense and that Plaintiffs have not refuted that defense.”*

#### FACTUAL BACKGROUND

Plaintiffs have serious mental illnesses and qualify for Medicaid-reimbursed Assertive Community Treatment services. Idaho's Department of Health and Welfare changed ACT reimbursement from a bundled billing model to fee-for-service billing effective December 1, 2025, after a statewide Medicaid reimbursement-rate reduction. Plaintiffs contended that unbundling eliminated ACT services and placed them at risk of hospitalization or institutionalization, while defendants maintained that comparable component and coordinated services remained available. The record did not identify, for each plaintiff, which benefits were denied under the new billing structure or establish that the unbundled services were not comparable.

#### PROCEDURAL HISTORY

Plaintiffs filed the action on November 26, 2025, asserting ADA and Rehabilitation Act claims. After the court denied an initial temporary restraining order, plaintiffs filed an amended complaint and renewed their request for injunctive relief. Following a December 19, 2025 hearing, plaintiffs moved for class certification. The court denied the renewed preliminary-injunction motion and denied class certification without prejudice.

#### DISPOSITION

other

#### CASES CITED

- Vinson v. Thomas, 288 F.3d 1145, 1156 (9th Cir. 2002)
- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20, 24 (2008)
- Labrador v. Poe by and through Poe, 144 S. Ct. 921, 923 (2024) (Gorsuch, J., concurring)

- Lopez v. Brewer, 680 F.3d 1068, 1072 (9th Cir. 2012)
- Drakes Bay Oyster Co. v. Jewell, 747 F.3d 1073, 1092 (9th Cir. 2014)
- Doe v. Snyder, 28 F.4th 103, 111 (9th Cir. 2022)
- Alliance for the Wild Rockies v. Cottrell, 632 F.3d 1127, 1131 (9th Cir. 2011)
- N.D. v. Reykdal, 102 F.4th 982, 992 (9th Cir. 2024)
- Assurance Wireless USA, L.P. v. Reynolds, 100 F.4th 1024, 1031 (9th Cir. 2024)
- Disney Enterprises, Inc. v. VidAngel, Inc., 869 F.3d 848, 856 (9th Cir. 2017)
- M.R. v. Dreyfus, 697 F.3d 706, 726, 730, 732-34, 736-37 (9th Cir. 2012)
- Townsend v. Quasim, 328 F.3d 511, 516-19 & n.3 (9th Cir. 2003)
- Olmstead v. L.C. ex rel. Zimring, 527 U.S. 581, 587, 592, 596-604 (1999)
- Fisher v. Oklahoma Health Care Authority, 335 F.3d 1175, 1182 (10th Cir. 2003)
- Sali v. Corona Regional Medical Center, 909 F.3d 996, 1002-05 (9th Cir. 2018)
- Wal-Mart Stores, Inc. v. Dukes, 564 U.S. 338, 351 (2011)
- K.W. v. Armstrong, 180 F. Supp. 3d 703, 721-22 (D. Idaho 2016)