

SUMMARY STATEMENT

Saint Alphonsus Regional Medical Center v. Elmore County and the Board of Elmore County Commissioners – Docket No. 42175

In a case arising out of Elmore County, the Idaho Supreme Court vacated the judgment of the district court and remanded this case for further proceedings. The case presented an issue of statutory interpretation of the Medical Indigency Act (the Act). Appellant Saint Alphonsus Regional Medical Center (Saint Alphonsus) submitted third party medical indigency applications on behalf of two patients. Respondent Elmore County and the Board of Elmore County Commissioners (the Board) denied the applications because the Board determined that the applications were not “completed applications” as required by the Act. Saint Alphonsus filed petitions for judicial review. The district court consolidated the cases and affirmed the Board’s decision. Saint Alphonsus appealed to this Court. Based on its interpretation of the Act, and specifically Idaho Code sections 31-3502(7) and 31-3504(1), the Court held that a third party applicant, such as Saint Alphonsus, was not required to provide the signatures of the patient to submit a “completed application” under the Act. The Court held that the third party’s application is a “completed application” with signatures from only the third party.