

SUMMARY STATEMENT

Access Behavioral Health v. State of Idaho, Department of Health and Welfare
Docket No. 48353-2020

The Idaho Supreme Court affirmed the district court's decision upholding an order of the Idaho Department of Health and Welfare ("Department") that demanded recoupment of Medicaid payments made to Access Behavioral Health ("Access").

The Department demanded recoupment of Medicaid payments that the Department made to Access because Access failed to comply with Medicaid recordkeeping requirements. Access appealed the Department's administrative actions to a hearing officer from the Fair Hearings Unit of the Idaho Attorney General's Office, who affirmed the Department's administrative actions and concluded that the Department was entitled to recoupment of the overpayments. Thereafter, Access petitioned for judicial review. The district court affirmed the hearing officer's order.

Access appealed the district court's decision, arguing that the Department did not have statutory authority to recoup the payments, that Access complied with the Idaho Medicaid recordkeeping regulations, that the Department's recoupment demand failed to comply with federal law, and that the doctrine of laches barred the Department's recoupment demands.

The Supreme Court affirmed the district court's decision. First, the Supreme Court held that the Department had legal authority to issue a demand for recoupment from Access pursuant to Idaho Code section 56-209(h)(5). Second, the Court determined that Access failed to establish that it was entitled to the Medicaid payments. Third, the Court affirmed the district court's determination that the federal False Claim Act's materiality requirement did not apply to the Department's recoupment demands. Finally, the Court held that the doctrine of laches did not bar the Department's administrative actions because Access was on notice that the Department was investigating the claims.

This summary constitutes no part of the opinion of the Court, but has been prepared by court staff for the convenience of the public.