

Bond Case Briefs

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HEALTHCARE REIMBURSEMENT - CALIFORNIA

County of Santa Clara v. Superior Court of Santa Clara

Supreme Court of California - July 10, 2023 - P.3d - 2023 WL 4414084

Non-contracting hospitals brought action against county to recover reasonable compensation for emergency medical services provided to individuals enrolled in health care service plan operated by county.

The Superior Court overruled county's demurrer. On petition for writ of mandate, the Sixth District Court of Appeal granted petition. Review was granted.

The Supreme Court held that:

- Hospitals' compliance with Government Claims Act's claims presentation requirements did not establish that they sought money or damages covered by Act's immunity provisions, and
- Government Claims Act did not immunize county from hospitals' quantum meruit claims.

Government Claims Act's claims presentation requirements were broader in scope than Act's public entity immunity or liability provisions, and thus hospitals' compliance with Act's claims presentation requirements when seeking compensation for emergency medical services provided to individuals enrolled in county's health care service plan did not establish that they sought money or damages covered by Act's immunity provisions.

Government Claims Act did not immunize county from non-contracting hospitals' quantum meruit claims to enforce statutory duty under Knox-Keene Act to reimburse them for reasonable cost of emergency medical services and care they provided to individuals enrolled in county's health care service plan, even though that duty would result in payment of money; county was subject to Knox-Keene Act's regulatory scheme because it chose to enter health care plan market, hospitals did not seek money damages, but to compel county to comply with its mandatory duty under Knox-Keene Act, and permitting hospitals to proceed furthered Knox-Keene Act's fundamental purpose of protecting California's health care delivery system's continued financial viability.