

SUPREME COURT OF IOWA

Tama County v. Grundy County

648 N.W.2d 83 (Iowa 2002) · No. No. 00-2108 · Decided July 17, 2002

SUMMARY

The Supreme Court of Iowa held that a county of legal settlement must reimburse another county for the costs of an involuntary hospitalization in a private hospital when the services were authorized through the single-entry-point process. The court affirmed the judgment requiring Grundy County to reimburse Tama County for medical and hospital expenses incurred for S.P.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Carter, Justice
JURISDICTION	Iowa
DECIDED	July 17, 2002
DOCKET	No. 00-2108
DISPOSITION	affirmed
PROCEDURAL POSTURE	Grundy County appealed from a district court judgment requiring it to reimburse Tama County for expenses Tama County paid for the involuntary hospitalization and treatment of a person whose county of legal settlement was Grundy County.
STANDARD OF REVIEW	The court reviewed the statutory interpretation issue presented on appeal and affirmed the district court's judgment; the facts were undisputed.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Grundy County, Iowa v. Tama County, Iowa

TOPICS

- health law
- municipal law
- statutory interpretation
- legislative intent
- plain meaning rule

PRACTICE AREAS

- health law
- municipal law
- mental health law
- statutory interpretation

QUESTIONS PRESENTED

1. Whether Iowa Code section 230.1, as amended in 1996, required the county of a patient's legal settlement to reimburse another county for involuntary hospitalization expenses incurred at a private hospital when the services were authorized through the single-entry-point process.
2. Whether the single-entry-point process applicable to a court-ordered involuntary hospitalization is the process of the county in which the emergency or involuntary commitment is ordered.

HOLDINGS

1. A county of legal settlement is liable for costs and expenses associated with a person with mental illness when the services and support were authorized through the single-entry-point process, even if the involuntary hospitalization occurred in a private hospital rather than a state hospital.
2. For a court-ordered involuntary hospitalization, the statutory reference to authorization through the single-entry-point process refers to the process of the county in which the emergency or involuntary commitment is ordered.

KEY QUOTATIONS

"In applying the foregoing principles to the interpretation of section 230.1, we conclude that the language "a county of legal settlement is not liable for costs and expenses associated with a person with mental illness unless the costs of expenses are for services and other support authorized for the person through the single-entry process," must be read as also supporting the converse of what it declares, i.e., that a county of legal settlement is liable for such costs if they are authorized through the single-entry-point process." (648 N.W.2d at 86)

FACTUAL BACKGROUND

S.P., an adult whose county of legal settlement was Grundy County, was found in Tama County on November 23, 1999, and was adjudicated mentally ill and in need of immediate hospitalization. She was involuntarily hospitalized at Mercy Medical Center, a private hospital in Cedar Rapids, and treated by private physicians. The hospital and physicians had been designated by Tama County as care providers under Tama County's single-entry-point process for mental health services. Tama County paid \$2,959.57 for the services and sought reimbursement from Grundy County.

PROCEDURAL HISTORY

S.P. was involuntarily hospitalized in a private hospital in Cedar Rapids after being found in Tama County. Tama County paid \$2,959.57 for the hospitalization and medical services and demanded reimbursement from Grundy County. After Grundy County refused, Tama County filed a petition for declaratory judgment, and the district court ordered reimbursement. The Supreme Court of Iowa affirmed.

DISPOSITION

affirmed

CASES CITED

- Credit Bureau Enterprises, Inc. v. Pelo, 608 N.W.2d 20 (Iowa 2000)
- Danker v. Wilimek, 577 N.W.2d 634, 636 (Iowa 1998)
- Harris v. Olson, 558 N.W.2d 408, 410 (Iowa 1997)
- In re Estate of Thomann, 649 N.W.2d 1 (Iowa 2002)
- Miller v. Westfield Ins. Co., 606 N.W.2d 301, 305 (Iowa 2000)
- T & K Roofing Co. v. Iowa Department of Education, 593 N.W.2d 159, 162-63 (Iowa 1999)

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