

SCOTUS reverses lower court decision, Medicaid providers can't bring injunction against Idaho officials



United States Supreme Court Building

SCOTUS reverses a lower court decision in *Armstrong v. Exceptional Child Center, Inc.*:

Idaho residential care facilities sued the state for failure to implement higher reimbursement rates required by Medicaid which the Idaho legislature had not sufficiently funded. The federal district court and the Ninth Circuit Court of Appeals sided with the facilities ruling that Idaho's Medicaid rates were insufficient to support the federal requirements that payments had to be at such a level to provide for quality care and adequate access to services. In [Armstrong v. Exceptional Child Center Inc.](#), the United States Supreme Court reversed the lower court ruling and held that the Supremacy Clause does not confer a private right of action and so Medicaid providers

cannot sue for an injunction requiring the state to comply with the reimbursement rate provision of the federal Medicaid Act. 42 U.S.C. §1396a(a)(30)(A)

View on [SCOTUSBLOG](#)