



Intergovernmental Transfers in the Medicaid Program

State of Utah
Division of Integrated Healthcare
October 2023

To: Social Services Appropriation Subcommittee
From: Jennifer Strohecker, State Medicaid Director
Subject: Intergovernmental Transfers in the Medicaid Program

Purpose

As required by [26B-3-130\(2\)\(b\)](#), the Department of Health and Human Services (DHHS) submits the following report regarding intergovernmental transfers in the Medicaid program:

- (2)(a) An entity that receives federal Medicaid dollars from the department as a result of an intergovernmental transfer shall, on or before August 1, 2017, and on or before August 1 each year thereafter, provide the department with:*
- (i) information regarding the payments funded with the intergovernmental transfer as authorized by and consistent with state and federal law;*
 - (ii) information regarding the entity's ability to repay federal funds, to the extent required by the department in the contract for the intergovernmental transfer; and*
 - (iii) other information reasonably related to the intergovernmental transfer that may be required by the department in the contract for the intergovernmental transfer.*
- (b) On or before October 15, 2017, and on or before October 15 each subsequent year, the department shall prepare a report for the Executive Appropriations Committee that includes:*
- (i) the amount of each intergovernmental transfer under Subsection (2)(a);*
 - (ii) a summary of changes to CMS regulations and practices that are known by the department regarding federal funds related to an intergovernmental transfer program; and*
 - (iii) other information the department gathers about the intergovernmental transfer under Subsection (2)(a).*

Executive summary

Over the last two decades, when a government-owned entity enters into a new waiver or similar arrangement to begin receiving Medicaid federal funding to match its local dollars, the Division of

Integrated Healthcare (DIH or Division) within the Department of Health and Human Services (DHHS) is required to collect the non-federal share (Seed) and has charged that entity an administrative fee to help pay for the additional administrative work to operate the new program. This administrative fee is referred to as Administrative Indirect Match (3-2-1).

CUMULATIVE AMOUNT OF ALL PROGRAM INTERGOVERNMENTAL TRANSFERS	Seed	3-2-1	Total
GRAND TOTAL	\$129,115,410.45	\$6,080,012.55	\$135,195,423.00

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Amount of Intergovernmental Transfers

The following tables detail the program, entity, and amount of intergovernmental transfer that was received by the Department on a cash basis for state Fiscal Year 2023. During any given state fiscal year, there are adjustments to seed and 3-2-1 administrative indirect match based on transactions that occurred in the previous fiscal year. As a result, the seed and/or 3-2-1 amounts can potentially be negative.

DISPROPORTIONATE SHARE HOSPITAL (DSH)	Seed	3-2-1	Total
BEAVER VALLEY HOSPITAL	\$300,461.13	\$23,754.40	\$324,215.53
CANYONLANDS HEALTHCARE	-\$47,071.55	-\$3,676.03	-\$50,747.58
GARFIELD MEMORIAL HOSPITAL	\$85,968.29	\$6,636.13	\$92,604.42
GUNNISON VALLEY HOSPITAL	-\$83,320.24	-\$10,102.98	-\$93,423.22
KANE COUNTY HOSPITAL	\$206,681.57	\$18,691.36	\$225,372.93
MILFORD VALLEY MEMORIAL HOSPITAL	\$90,808.76	\$9,792.88	\$100,601.64
MOAB REGIONAL HOSPITAL (Canyonlands SSD)	\$241,732.66	\$22,328.51	\$264,061.17
SAN JUAN HOSPITAL	-\$157,354.25	-\$8,720.04	-\$166,074.29

COUNTY MENTAL HEALTH	Seed	3-2-1	Total
BEAR RIVER MENTAL HEALTH AUTHORITY	\$3,202,252.48	\$123,519.29	\$3,325,771.77
CENTRAL UTAH MENTAL HEALTH & SUBSTANCE ABUSE	\$1,054,549.78	\$50,289.70	\$1,104,839.48
DAVIS COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$4,893,346.91	\$182,417.05	\$5,075,763.96
FOUR CORNERS MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$1,093,066.73	\$52,906.86	\$1,145,973.59
SALT LAKE COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$19,052,504.24	\$665,158.24	\$19,717,662.48
SAN JUAN COUNTY	\$707.65	\$69.34	\$776.99
SOUTHWEST MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$4,316,634.51	\$161,953.02	\$4,478,587.53
SUMMIT COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$182,276.47	\$17,192.65	\$199,469.12
TOOELE COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$1,425,209.76	\$64,801.60	\$1,490,011.36
UINTAH BASIN MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$1,634,900.48	\$72,711.24	\$1,707,611.72
WASATCH COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$88,240.18	\$10,152.39	\$98,392.57
WASATCH MENTAL HEALTH AUTHORITY (UTAH COUNTY)	\$8,116,334.69	\$298,390.13	\$8,414,724.82
WEBER HUMAN SERVICES	\$4,700,674.63	\$175,627.83	\$4,876,302.46

COUNTY SUBSTANCE ABUSE	Seed	3-2-1	Total
BEAR RIVER HEALTH DEPARTMENT	\$178,806.28	\$8,769.18	\$187,575.46
CENTRAL UTAH MENTAL HEALTH & SUBSTANCE ABUSE	\$168,094.11	\$17,733.12	\$185,827.23
DAVIS COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$350,467.33	\$29,939.83	\$380,407.16
FOUR CORNERS MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$143,418.54	\$15,131.60	\$158,550.14
SALT LAKE COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$2,252,709.72	\$100,374.02	\$2,353,083.74
SOUTHWEST MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$380,281.12	\$31,505.61	\$411,786.73
SUMMIT COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$11,040.89	\$1,147.65	\$12,188.54
TOOELE COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$83,926.54	\$8,311.06	\$92,237.60
UINTAH BASIN MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$160,045.50	\$16,831.59	\$176,877.09
UTAH COUNTY SUBSTANCE ABUSE AUTHORITY	\$513,259.56	\$33,164.23	\$546,423.79
WASATCH COUNTY MENTAL HEALTH & SUBSTANCE ABUSE AUTHORITY	\$9,351.11	\$921.80	\$10,272.91
WEBER HUMAN SERVICES	\$466,470.70	\$37,341.08	\$503,811.78

NURSE AIDE REGISTRY	Seed	3-2-1	Total
DAVIS APPLIED TECHNOLOGY COLLEGE	\$69,578.34	\$4,174.71	\$73,753.05

NON-STATE GOVERNMENT OWNED NURSING HOME UPPER PAYMENT LIMIT (UPL)	Seed	3-2-1	Total
BEAVER VALLEY HOSPITAL	\$38,406,778.48	\$2,008,003.41	\$40,414,781.89
CANYONLANDS HEALTHCARE	\$1,733,759.47	\$109,812.55	\$1,843,572.02
EMERY COUNTY CARE AND REHABILITATION	\$230,561.91	\$22,423.48	\$252,985.39
GARFIELD COUNTY	\$39,289.55	\$4,050.47	\$43,340.02
GUNNISON VALLEY HOSPITAL	\$11,140,718.25	\$625,892.35	\$11,766,610.60
KANE COUNTY HOSPITAL	\$2,014,585.72	\$136,989.25	\$2,151,574.97
MILFORD MEMORIAL HOSPITAL	\$0.00	\$0.00	\$0.00
MILLARD COUNTY CARE AND REHABILITATION	\$393,093.39	\$29,907.49	\$423,000.88
UINTAH BASIN REHABILITATION AND SENIOR VILLA	\$412,699.17	\$30,815.18	\$443,514.35
UINTAH CARE CENTER	\$515,753.46	\$33,306.14	\$549,059.60

SCHOOL BASED SKILLS DEVELOPMENT	Seed	3-2-1	Total
ALPINE SCHOOL DISTRICT	\$933,552.91	\$50,439.86	\$983,992.77
BOX ELDER SCHOOL DISTRICT	\$199,389.91	\$20,502.65	\$219,892.56
CACHE COUNTY SCHOOL DISTRICT	\$297,436.84	\$26,290.80	\$323,727.64
CANYONS SCHOOL DISTRICT	\$857,051.16	\$47,465.16	\$904,516.32
CARBON COUNTY SCHOOL DISTRICT	\$109,192.41	\$12,566.74	\$121,759.15
DAVIS COUNTY SCHOOL DISTRICT	\$1,411,790.63	\$68,450.54	\$1,480,241.17
DUCHESNE SCHOOL DISTRICT	\$207,229.41	\$20,767.05	\$227,996.46
GRAND COUNTY SCHOOL DISTRICT	\$82,362.54	\$9,353.87	\$91,716.41
GRANITE SCHOOL DISTRICT	\$1,615,001.68	\$75,866.28	\$1,690,867.96

JORDAN SCHOOL DISTRICT	\$7,742,171.60	\$52,620.13	\$7,794,791.73
JUAB COUNTY SCHOOL DISTRICT	\$42,475.22	\$4,860.79	\$47,336.01
LOGAN CITY SCHOOL DISTRICT	\$153,243.56	\$16,551.62	\$169,795.18
MILLARD SCHOOL DISTRICT	\$23,433.72	\$2,484.14	\$25,917.86
MURRAY SCHOOL DISTRICT	\$151,079.17	\$16,481.11	\$167,560.28
NEBO SCHOOL DISTRICT	\$413,929.00	\$30,613.78	\$444,542.78
NOAH WEBSTER ACADEMY	\$4,560.01	\$480.00	\$5,040.01
NORTH SANPETE SCHOOL DISTRICT	\$37,167.40	\$4,254.69	\$41,422.09
OGDEN CITY SCHOOL DISTRICT	\$255,940.77	\$24,416.52	\$280,357.29
OGDEN PREPARATORY ACADEMY	\$4,560.01	\$480.00	\$5,040.01
PROVO SCHOOL DISTRICT	\$419,601.26	\$30,995.46	\$450,596.72
SALT LAKE SCHOOL DISTRICT	\$602,386.93	\$37,929.35	\$640,316.28
SAN JUAN SCHOOL DISTRICT	\$111,056.44	\$12,694.49	\$123,750.93
SEVIER SCHOOL DISTRICT	\$86,240.73	\$9,817.47	\$96,058.20
SOUTH SANPETE SCHOOL DISTRICT	\$151,772.09	\$16,565.55	\$168,337.64
SOUTH SUMMIT SCHOOL DISTRICT	\$8,432.81	\$965.76	\$9,398.57
SOUTHERN UTAH LEA DISTRICTS	\$360,345.15	\$28,644.16	\$388,989.31
SPECTRUM ACADEMY	\$258,569.45	\$25,081.01	\$283,650.46
TOOELE SCHOOL DISTRICT	\$323,922.52	\$27,316.31	\$351,238.83
UINTAH COUNTY SCHOOL DISTRICT	\$137,453.14	\$15,591.12	\$153,044.26
WASATCH COUNTY SCHOOL DISTRICT	\$153,762.22	\$16,742.92	\$170,505.14
WASHINGTON COUNTY SCHOOL DISTRICT	\$910,738.83	\$49,704.22	\$960,443.05
WEBER SCHOOL DISTRICT	\$474,404.52	\$33,020.85	\$507,425.37

TARGETED CASE MANAGEMENT	Seed	3-2-1	Total
BEAR RIVER HEALTH DEPARTMENT	\$55,948.92	\$5,943.76	\$61,892.68
CENTRAL UTAH PUBLIC HEALTH	\$5,633.78	\$596.66	\$6,230.44
DAVIS COUNTY	\$82,270.77	\$8,796.81	\$91,067.58
SALT LAKE CITY CORPORATION	\$216,287.75	\$19,285.27	\$235,573.02
SAN JUAN COUNTY	\$3,020.11	\$317.34	\$3,337.45
SOUTHEAST DISTRICT HEALTH DEPARTMENT	\$16,042.21	\$1,696.53	\$17,738.74
TOOELE COUNTY CORPORATION	\$7,688.30	\$794.32	\$8,482.62
TRI-COUNTY HEALTH DEPARTMENT	\$3,821.27	\$408.52	\$4,229.79
UTAH COUNTY	\$82,938.24	\$8,732.46	\$91,670.70
WASATCH COUNTY	\$1,144.15	\$123.03	\$1,267.18
WEBER COUNTY CORPORATION	\$27,066.89	\$2,864.08	\$29,930.97

Per UCA 26B-3-129(1)(a), the tables above do not contain information on the following intergovernmental transfers:

(ii) *"Intergovernmental transfer" does not include:*

- (A) *the transfer of public funds from one state agency to another state agency; or*
- (B) *a transfer of funds from the University of Utah Hospitals and Clinics.*

Summary of Changes to Federal Regulations and Practices

There have been no changes to 42 CFR §433.51 or §1903(w)(6) of the Social Security Act since the last report was issued to the Utah Legislature in October 2022.

The Division continues to seek legal advice from Medicaid experts and the Federal Centers for Medicare and Medicaid Services (CMS) to ensure that seed funding, as currently in practice, complies with CMS requirements. The Division reviews technical assistance provided by CMS on this issue with contracted Medicaid experts to validate CMS's interpretation of statute and regulation.

Other Information

The Division closely monitors these programs. Per UCA 26-3-129(2)(a), the Division collected reports from each entity and reviewed the information provided about each entity's ability to pay back a potential disallowance. The Division flagged areas of potential concern from the responses

and will follow-up with the appropriate entities to obtain additional information as needed. If the Division finds something that indicates potential problems in an entity's ability to pay back a potential disallowance, the Division will look to strengthen its oversight of the entity's activities and determine if the contract needs to be modified or terminated.