Mondragon, Tabitha, HCA

From: Gerri Duran <gerandran@comcast.net>
Sent: Wednesday, October 7, 2026 1:34 PM
To: HCA-madrules
Subject: [EXTERNAL] NMOTA Public Comment for Proposed Register 32 Proposed Amendments to 8.320.2 NMAC—EPSDT Services
Attachments: EPSDT COMMENTS october 7 2026.docx

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Hello, attached and embedded in this email are the comments from the New Mexico Occupational Therapy Association regarding Register 32 Proposed Amendments to 8.320.2 NMAC—EPSDT Services

To the Health Care Authority:

I am submitting these comments as a representative of the New Mexico Occupational Therapy Association (NMOTA). My comments concern 8.320.2.16 EPSDT SPECIAL REHABILITATION (FAMILY INFANT TODDLER EARLY INTERVENTION). The first request is making language regarding occupational therapy services align with services involving physical therapy, 8.320.2.16 (D) (2) (d) and speech language pathology/audiology services 8.320.2.16 (D) (2) (f). An additional insertion of a key tenet of the definition of occupational therapy services is also proposed (see below).

Proposed and requested language in blue font:

8.320.2.16 (D) (2) (d). Occupational therapy services are provided by or under the direction of a qualified ~~MAD enrolled occupational therapist (OT) as the result of a referral from the MAP eligible recipient's PCP~~. **occupational therapist (OT) within the scope of their practice relevant to the medical and rehabilitative needs of the MAP eligible recipient.** Occupational therapy services include the evaluation of the MAP eligible recipient to determine if ~~[he or she is]~~ **they** are experiencing problems that interfere with ~~[his or her]~~ **their participation in meaningful activities** or functional performance and the provision of therapies that are rehabilitative, active or restorative, and designed to correct or compensate for a medical problem interfering with age appropriate functional performance. Services also include consultation with the MAP eligible recipient's family and other professional staff.

Thank you for considering the comments and proposed edits from the New Mexico Occupational Therapy Association. I am available for clarification.

Respectfully,

Gerri A. Duran, PhD, MS, OT/L, FAOTA

New Mexico Occupational Therapy Association
1-505-238-7223

Public Comment on Proposed Register 32
Proposed Amendments to 8.320.2 NMAC—EPSDT Services

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