Mondragon, Tabitha, HCA

From: NM Pediatric Society <ExecutiveDirector@nmaap.org>
Sent: Friday, February 27, 2026 4:57 PM
To: HCA-madrules; Williams, Jennifer, HCA
Subject: [EXTERNAL] Feedback re: NMAC rule 8.324.7

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NM Health Care Authority (HCA)
ATTN: Medical Assistance Division Public Comments

Re: New Mexico Administrative Code (NMAC) rule 8.324.7, Adjunct Services, Transportation Services and Lodging

Dear NM Health Care Authority,

Thank you for the opportunity to provide feedback on the above NMAC changes. I appreciate the consideration of my input on behalf of providers with New Mexico Pediatric Society. After discussing these rule changes with several of the NMPS members, here is the feedback we wish to share.

8.324.7.12, G

Would consider revising the lodging criteria to allow consideration of lodging when travel exceeds 3.5 hours one way, when appointments require departure before 5:00 a.m. or return after 9:00 p.m., or when a provider documents medical necessity, such as prolonged or multi-hour services.

Pediatric patients—specialty services are concentrated in Albuquerque, requiring extended travel. Traveling more than seven hours in a single day, in addition to attending a medical appointment, presents a significant access barrier. This burden is especially acute for children, pregnant members, and individuals with complex or serious medical conditions. Expanded lodging flexibility would improve access to medically necessary care while supporting safe and sustainable transportation operations

8.324.7.12, I

Would consider adding language that allows minor children to accompany an adult Medicaid member when medically or socially necessary, and permits siblings to be transported when space is available.

Patients with the greatest need and fewest resources face unnecessary obstacles to accessing care. Allowing flexibility for accompanying kids would meaningfully improve access to services without undermining program integrity.

8.324.7.13, A

Public Health, including Women, Infants, and Children (WIC) clinics, provides critical preventive and supportive services to kids and families. Revising the language to explicitly state that services provided

by public health offices, including WIC, are covered by the Medical Assistance Division (MAD) would be helpful.

8.324.7.15,1

Would consider increasing the mileage threshold for required documentation of medical necessity from 120 miles or alternatively adopting less burdensome mechanisms to establish medical necessity.

Other states have successfully implemented alternative approaches, such as transportation needs assessment tools or care coordination documentation, which reduce administrative burden while maintaining appropriate oversight. Similar options should be considered to promote equity and access across New Mexico.

Thank you again for your consideration,

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