

Mondragon, Tabitha, HCA

From: Katie Gordon <kgordon@drnm.org>
Sent: Thursday, June 19, 2025 2:47 PM
To: HCA-madrules
Subject: [EXTERNAL] Public Comments from Disability Rights NM

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New Mexico Health Care Authority
Office of the Secretary
ATTN: Medical Assistance Division Public Comments
P.O. Box 2348
Santa Fe, NM 87504-2348

Submitted via electronic mail to HCA-madrules@hca.nm.gov on June 19, 2025.

Dear Secretary Armijo,

Disability Rights New Mexico (DRNM) is writing to express our opposition to the proposed rule changes to the New Mexico Administrative Code, including amendments to rule 8.200.400 NMAC-Medicaid Eligibility, General Recipient Rules, 8.249.400 NMAC-Refugee Medical Assistance Program, and 8.249.600-Refugee Assistance Program, Benefit Description. As you know, DRNM is the federally-mandated Protection and Advocacy organization for the state of New Mexico. Our mission is to protect, promote, and expand the legal rights of individuals with disabilities. In this particular instance, this includes advocating for the health care of disabled individuals new to the U.S. who have not yet been deemed eligible for citizenship.

It is our understanding that the proposed amendments would significantly reduce the time period in which new refugees may receive medical assistance from one year to only four months. We are deeply concerned about how these rule changes would impact immigrants with disabilities, including children and pregnant women, who may already face steep barriers to receiving care. This reduction in health care access not only violates principles of human rights and equity, but also undermines the core tenets of disability justice, which demand dignity, autonomy, and access for all people regardless of background or circumstance.

Immigrants with disabilities are likely to rely upon community-based supports, require management of chronic conditions, and need assistive devices and long-term therapies. Restricting their access to only four months of care upon arrival to the U.S. will undoubtedly lead to preventable medical crises. This may cause a significant uptick in emergency room visits, putting further strain on New Mexico's hospital system that is already stretched too thin. This outcome would directly contradict the goal of cost containment.

Moreover, our immigrant communities are an integral part of New Mexico's cultural and economic fabric. Many refugees are caregivers and frontline workers who contribute daily to the health and well-being of all New Mexicans. To exclude them from longer-term health care access is simply self-defeating.

We urge the NM Health Care Authority to reconsider these proposed amendments. We instead ask for rules that will expand, not restrict, access to healthcare.

Thank you for the opportunity to comment on these proposed changes. DRNM remains committed to working with HCA to ensure a health care system that is inclusive, just, and accessible for everyone living within our state.

Sincerely,

Katie Gordon
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