



SENT VIA EMAIL to MoniqueM.Parks@nmmb.nm.gov

October 23, 2026

New Mexico Medical Board
2055 South Pacheco Street, Bldg. 400
Santa Fe, NM 87505

Re: Proposed Rule 16.10.33 NMAC – Interstate Medical Licensure Compact

Dear Director Parks and Members of the Board:

On behalf of our 48 New Mexico hospital members, I am writing to request an important addition to the proposed rule establishing the requirements for licensure in New Mexico via the Interstate Medical Licensure Compact (IMLC).

As proposed, the issuance of a license by the board via application from the IMLC appears to be guaranteed (see 16.10.33.10(D)). This apparent guarantee conflicts with §16-6-15 NMSA 1978, which provides that the Board may refuse to issue a license in certain circumstances and conflicts with the legislative intent of the Board's duty to protect the public and in joining the IMLC.

We strongly encourage the board to mirror the language in 16.10.2.10(C) NMAC regarding denial of an expedited license application. With the incorporation of that language, 16.10.33.10(D) would read:

“D. Issuance of license: Upon completion of the registration process and payment of required fees, the board shall issue an IMLC license unless the board may have other cause to deny the application pursuant to Section 61-6-15 NMSA 1978. The license authorizes the physician to practice medicine in New Mexico in accordance with the Medical Practice Act and all applicable laws and rules of the board.”

Thank you for considering our request for this change and thank you for working diligently to promulgate these rules for the state to join the IMLC. Please do not hesitate to contact me if we can provide additional information or clarification.

A handwritten signature in blue ink, appearing to read 'Troy Clark'.

Troy Clark
President and CEO