

Kimberly Pruett, MD
EMS Medical Direction Committee Chair
Albuquerque, NM
06 June 2025

NMDOH OGC
P.O. Box 26110
1190 St. Francis Dr., Suite N-4095
Santa Fe, NM 87502-6110

Subject: Medical Direction Committee Input on EMS Bureau Suggested Rule Changes

Dear NM Hearing Officer,

I am writing to you regarding the suggested EMS rule changes submitted by the EMS Bureau that will be reviewed on 6 June, 2025. According to the NMSA 1978 24-10B EMS Act, 7.27.3C.1, the Medical Direction Committee (MDC) has an obligation to provide input on the medical appropriateness of suggested rule changes. The MDC convened on May 6th, 2025, to review and comment on the proposed changes. The committee findings are listed below for consideration by the hearing officer:

NMAC 7.27.2 Licensing Rule

1. The EMS Bureau proposed a new licensure level to include an EMS-RN. After discussion, the Medical Direction Committee voted unanimously to oppose the inclusion of this licensure level in the rule. The committee also voted that any language involving the EMS-RN from the proposed language be stricken from the rule.

Concerns regarding this new licensure level included lack of time to coordinate with parties who would be affected by this, namely, the board of nursing and the Nursing Association. There was wide recognition among committee members that EMS and nursing are two distinct professions with different training and capabilities and the professions do not easily cross over in terms of patient care. There also were concerns voiced about reimbursement and re-licensing cost equity.

The committee recommends that if the EMS Bureau wishes to continue to pursue this licensure level, it should be done collaboratively in a subcommittee including EMS leaders, medical direction, and nursing leadership.

2. The committee also voted to strike the change to the current licensing reciprocity process that includes the new verbiage “If the applicant has joined an EMS agency as volunteer or employee and is verified by agency leadership, **the agency’s medical director may verify the applicant’s competency in lieu of taking the bureau exam**; if the applicant is not associated with an EMS agency, they must successfully complete the NM reciprocity exam at the appropriate licensure level .”

Concerns from the committee about removing the testing requirement included the loss of the ability of the EMS Bureau to maintain situational awareness and provide a standardized process and oversight for people from other states to take care of residents and visitors of New Mexico. Medical directors concerned about being involved in the licensing process, which they view differently than credentialing and may blur lines for medical directors regarding the hiring process and create potential human resources conflict, legal issues, and liability.

The committee recommends that if the EMS Bureau wishes to continue to pursue this change in the reciprocity process, it should be done collaboratively in a subcommittee including EMS leaders, EMS medical direction, and EMS educators.

3. The committee motioned and voted unanimously to support Page 10, acceptance of first responder final exam as licensing exam completion.

NMAC 7.27.4 Emergency Medical Services Fund Act – no votes

NMAC 7.27.5 Certification of Air Ambulances – no votes

NMAC 7.27.6 EMS Advance Directives – no votes

NMAC 7.27.11 Licensing Provisions (Scope of Practice) – no votes

I kindly request that you accept this input and give it serious consideration while contemplating EMS rule changes. I am confident that your examination of this matter will be thorough and fair, and I am grateful for your expertise and the opportunity to provide input.

Should you require any additional documentation or clarification, please do not hesitate to contact me. Thank you for your time and attention to this matter.

Sincerely,

Kimberly Pruett

Kimberly Pruett, MD