

From: [Melissa Marie](#)
To: [Clark, Jacob, DOH](#)
Cc: [Oriana Lee, Executive Director, NMDA](#); [Dr. Nancy Torres](#); [Andrea Beltran](#)
Subject: [EXTERNAL] Public Comment on Proposed New Rule 7.30.16 NMAC (Doula Credentialing for Medicaid Reimbursement) — Technical Corrections
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Attachments: [image1787697385547](#)

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Jacob Clark

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Re: Written Public Comment on Proposed New Rule 7.30.16 NMAC, Doula Credentialing for Medicaid Reimbursement — Hearing Date August 28, 2026

Dear Mr. Clark,

On behalf of the New Mexico Doula Association (NMDA), thank you to the Department for advancing 7.30.16 NMAC and for the work of everyone who has helped bring the Doula Credentialing and Access Act into implementable rule. This rule is the product of years of community organizing, legislative advocacy, and relationship-building among doulas, families, and state partners across New Mexico, and NMDA is glad to see it moving toward codification.

Before turning to our technical comments, NMDA wants to name clearly: this rule is making history for New Mexico. We offer our deep support for 7.30.16 NMAC and our appreciation for the time, care, and effort the Department has invested in bringing it forward. This rule reflects what is possible when community knowledge and state systems work in partnership, and it will materially expand access to full spectrum doula care for families across our state. We are grateful, and we stand behind it.

We submit the following comments to flag two drafting corrections that we ask the Department to make before the rule is finalized, so that the text reads clearly and accurately for the doulas and communities who will rely on it.

1. Section 7.30.16.12 APPLICATION PROCESS, Subsection F (Recredential application) — numbering correction

Within Subsection F, item (2) sets out continuing education requirements, including subparagraph (g) Credit hour determination and subparagraph (h) Department approval of a CE program is valid for two years. The item immediately following — which begins "Upon conditional approval of the application, an applicant for recredential shall submit a request to DPS or a DPS vendor for a current state and national criminal history screening every recredentialing period" — is currently numbered (4). Because this item is not a continuing-education subparagraph but stands as its own requirement at the same level as items (1), (2), and (3), we ask that it be relabeled (3), consistent with the numbering convention already used elsewhere in Subsection F.

Relabeling this item as (3) will require the two items that follow it to be renumbered accordingly:

- The current item (5), "The department shall provide to a credentialed doula notice of expiration ninety days before the first day of the last month of the credentialed period," should become (4).
- The current item (6), "A doula who fails to submit the recredential application by the recredential expiration date shall lose their credential and be required to submit a new application," should become (5).

This is a numbering/formatting correction only and does not change the substance of any requirement.

2. Section 7.30.16.17.C, Committee review of criminal history screening results, item (3) — spelling correction

Item (3) currently reads, in relevant part: "The provisions of the Criminal Offender Employment Act, Section 28-2-1 through 28-2-6 NMSA 1978 shall govern any consideration of criminal records required or permitted by the Doula Credentialing and Access Act." The word "Credentialing" is misspelled; the correct spelling, consistent with the Act's actual name and its usage elsewhere throughout the rule, is "Credentialing" (one "l"). We ask that this be corrected to read "the Doula Credentialing and Access Act."

We appreciate the Department's care in developing this rule and the opportunity to offer these technical corrections in advance of the August 28, 2026 hearing. Please let us know if any clarification would be helpful, and thank you again for your continued partnership with New Mexico's doula workforce.

In community and gratitude,

Melissa Marie Lopez-Sullivan



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