

New Mexico Medicaid Access Monitoring Review Plan for

Fee-For-Service Recipients

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Period of Review: Calendar Year 2015

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NMHSD 2016 Medicaid Access Monitoring Review Plan for 2015

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Introduction

The Medical Assistance Division of the New Mexico Human Services Department (HSD/MAD) administers the New Mexico Medicaid program on behalf of the state and in collaboration with the federal Centers for Medicare and Medicaid Services (CMS) under the US Department of Health and Human Services.

As the single state agency responsible Medicaid programs and services in New Mexico, HSD/MAD, in accordance with 42 CFR 447.203, has developed methods to periodically measure and monitor the participation and availability of health care providers in the New Mexico Medicaid program to ensure that Medicaid fee-for-service (FFS) beneficiaries ("recipients") have access to care that is comparable to the non-Medicaid general population.

This is the first formal draft of the New Mexico Access Monitoring Review Plan, and it will be considered a draft pending public input from providers, recipients, professional associations, Indian Health Service (IHS) and other tribal health care providers, tribal leadership, and other interested individuals or entities. After the receipt of public and tribal input, submitted comments will be addressed and an updated version of this Plan will be sent to CMS by October 1, 2016.

The purpose of this first Plan is to establish baseline data from which additional studies and analyses can be performed. It is important to note that this Plan addresses only the Medicaid FFS population, in accordance with 42 CFR 447.203. In New Mexico, the Medicaid FFS population represents approximately 15 percent of total Medicaid enrollment. The 85 percent of Medicaid enrollees who are enrolled in the state's managed care program, Centennial Care, are not included in this study.

Time Period

This Access Review Monitoring Review Plan reflects data from calendar year 2015. When necessary, the month of July is used to reference a detailed comparison of one year to another year in order to assure the most accurate baseline comparisons. This first study is intended to meet the CMS requirements stated in the Code of Federal Regulations at 42 CFR Part 447 Medicaid Program; Methods for Assuring Access to Covered Medicaid Services; Final Rule, which requires the initial baseline year to be calendar year 2015, and limited to Medicaid FFS recipients only.

The 2015 Plan consists of:

- 1. Defining the characteristics of the recipient population, including identifying the population for whom access to providers will be evaluated.
- 2. Quantifying information from the Medicaid Call Center, which contains reports from recipients regarding access questions and concerns.
- 3. Comparing the Medicaid fee schedule to the Medicare fee schedule.
- 4. Identifying the areas of the state where the recipient population resides and defining the health care service areas that correspond to the recipients residing in those areas.
- 5. Focusing on specific services, as required by CMS, including:
 - Primary Care services
 - Physician Specialist services
 - Behavioral Health services
 - Pre- and Post-Natal Obstetric services, including labor and delivery
 - Home Health services
 - Dental Health services

Overview

The New Mexico Medicaid program provides health care coverage for nearly 40 percent of the state's total population, specifically serving low-income parents and adults, children, pregnant women, individuals with disabilities, and the elderly.

The New Mexico Medicaid program first began enrolling most Medicaid recipients into risk-based Medicaid managed care organizations in July 1997. Over time, enrollment in managed care has expanded to include recipients who are dually eligible for Medicare and Medicaid, and recipients who are in nursing facilities or receiving other long-term services and supports.

In January 2014, New Mexico implemented a more innovative managed care program through an 1115 demonstration waiver. The new program, called Centennial Care, established processes to allow a Medicaid applicant to select a managed care organization at the time of application, thereby eliminating the need to be in the FFS program for up to 60 days while waiting for the managed care enrollment, selection, or assignment process to occur. Most Medicaid recipients are enrolled in managed care with no time spent in the FFS program. Enrollment in Centennial Care is mandatory for most Medicaid recipients in New

Mexico; however, some recipients are considered exempt from managed care. These include:

- Native Americans, except those who are in nursing facilities or who are dually Medicare/Medicaid eligible or meet a nursing facility level of care and receive home and community benefits. Most Native Americans are considered exempt from Centennial Care, but may opt-in to the program at any time. Most Native Americans in New Mexico are served under the FFS program.
- Recipients who reside in Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICF-IIDs).
- Recipients with a nursing facility level of care whose services are provided through the Program of All-inclusive Care for the Elderly (PACE).
- Recipients with very limited benefits (that is, non "full benefit" recipients), which
 include recipients with family planning only benefits, recipients whose benefits are
 limited to paying Medicare premiums, and recipients whose coverage is limited to
 payment of coinsurance, deductible, and copayments following Medicare payment,
 such as Qualified Medicare Beneficiary (QMB) only individuals.

Defining Recipients

HSD/MAD's intention is to clearly identify the recipients for whom access is monitored in this Plan.

The characteristics of the recipients included in this plan are "full benefit" FFS recipients who:

- 1. Are not dually eligible for Medicare, since Medicare is the primary payer and providers must enroll separately to participate in Medicare;
- 2. Are not in ICF-IIDs, since these facilities are responsible for arranging for professional services; and
- Are not enrolled in the PACE program, because these recipients by definition are all dually enrolled in Medicare.

Also, because the status of any recipient can change over the course of the year -- such as being enrolled in FFS for only part of the year, being eligible for only part of the year, or changing eligibility categories -- and because providers can change enrollment status over the course of the year, it was determined that HSD/MAD would be able to establish a more accurate baseline by studying recipient access for the month of July 2015, essentially

creating a "snapshot" of recipient access based on recipient and provider enrollment for that month.

This will permit a year-to-year (July-to-July), comparison using similar monitoring tools and the same methodology.

Quantifying Information from the Medicaid Call Center -

Questions and Concerns Raised by Recipients

New Mexico operates a Medicaid call center as a service to all Medicaid recipients to personally engage and assist them with their needs. Each recipient's Medicaid card includes the toll-free number for the call center. The Medicaid call center operates Monday through Friday from 8 a.m. to 5 p.m. Recipients can leave a message after hours or on weekends and receive a call-back within 24 business hours. Calls to the call center are logged detailing the issues raised and the resolution. A weekly report is produced detailing the number of calls and the issue topics.

In order to identify trends in questions or concerns expressed by Medicaid FFS recipients about provider access issues, HSD/MAD reviewed a sampling of call center activity during five months in 2015. The analysis of calls shows over 65,000 calls in that period, or about 13,000 calls per month. Figure 1 shows the volume of calls during those five months by topic. Most of these recipient calls (94%) requested assistance with eligibility questions, which were typically resolved by call center staff. Call center data show that the issue of provider access was never raised by FFS callers during those five months in 2015. (The representative months studied were April, May, July, October and November 2015.)

Table 1: Number of NM Medicaid Call Center calls by topic, for five months in 2015

NM Medicaid Recipient Call Center (all recipients)

Sampling: 5 months in 2015

Topic/ Issue: Nature of Call(s)	Number
Claim Issue	1
CMS	2

CCO - Incorrect Info	0
CMS	1
CCO Call Ctr - Can't Reach Anyone	1
Complaint	2
Complaint about ISD	0
Compliment	2
CYFD Eligibility	71
Don't Know CCO	9
Presumptive Eligibility	0
Eligibility - Manager Approval	201
Eligibility	61,258
General Questions	1,531
MCO Selection	54
LTC Project	0
Other	134
Policy Questions	5
Provider Access-Unable to find (FFS)	0
RA Request	0
Replacement Cards	2
Provider Access-Unable to find	
network provider (Managed Care)	0
Research	239
TOTAL	65,513

The lack of calls to ask questions or express concerns about access to providers is a strong indicator that health care services are generally accessible and known to Medicaid FFS recipients. However, HSD/MAD acknowledges that there may be some dynamics within the FFS population that might contribute to not utilizing the call center for access questions, including:

- Language barriers, including many non-English speakers and/or English-as-a-Second-Language speakers.
- Limited telephone usage and connectivity.
- Preference for face-to-face interactions.
- Recognition of the rural way-of-life for residents to travel long distances for services, particularly specialized services.
- Historical understanding of where providers and services are (i.e., IHS), and less likely to explore new options.

While HSD/MAD collects and analyzes the Consumer Assessment of Healthcare Providers and Systems (CAHPS) surveys for managed care recipients, the Department does not have CAHPS surveys for FFS recipients. Consequently, HSD/MAD does not have CAHPS response data from FFS recipients.

Comparing Medicaid and Medicare Payment Rates

The New Mexico Medicaid program does not have access to private payer data or provider rates in the general commercial markets in New Mexico. HSD/MAD has compared the level of New Mexico Medicaid fee schedule allowed amounts to Medicare claim allowed amounts for the same service. This comparison was compiled using ranges of codes, rather than individual codes, in order to provide a clearer comparison. The information is based on a weighted average on the frequency of use of the code in each code range. The comparison was made by studying actual amounts that Medicare allowed for services versus what New Mexico Medicaid allowed for the same services.

Table 2, below, shows the New Mexico Medicaid SFY 2015 practitioner payment rates compared to Medicare.

Table 2 – New Mexico Medicaid SFY 2015 payment rates compared to Medicare

New Mexico SFY 2015 payment rates compared to Medicare by Type of Service

Description of Services	Procedure Codes	NM Medicaid Average Percent Compared to Medicare
SKIN including biopsies, removal of lesions, grafts, treatment of burns and sores, and tissue reconstruction	10021-17999	96.43%
BREAST and MASTECTOMY including biopsy and reconstruction	19000-19499	95.94%
MUSCULOSKELETAL SURGERIES penetrating wounds and trauma, joints and joint replacement, surgeries involving bone, muscle, and other soft tissue	20005-29999	102.30%

RESPIRATORY SYSTEM SURGERIES AND PROCEDURES including nose, sinus, throat, lungs	30000-32999	97.22%
CARDIOVASCULAR SYSTEM SURGERIES AND PROCEDURES including heart, arteries and bypass procedures	33010-37799	107.15%
BLOOD AND LYMPHATIC SYSTEM SURGERIES AND PROCEDURES including spleen, bone marrow, and lymph glands	38100-38999	121.66%
DIGESTIVE SYSTEM SURGERIES AND PROCEDURES including lips, mouth, esophagus, stomach, intestines, spleen, liver, and pancreas	40490-49999	103.74%
URINARY SYSTEM SURGERIES AND PROCEDURES including kidney, ureter, and bladder	50010-53899	109.36%
MALE GENITAL SYSTEM SURGERIES AND PROCEDURES	54000-55899	107.24%
FEMALE GENITAL SYSTEM SURGERIES AND PROCEDURES including sterilizations	56405-58999	103.42%
MATERNITY CARE AND DELIVERY Including antepartum and fetal procedures, deliveries, postpartum, and miscarriages	59000-59830	92.27%
ENDOCRINE AND NERVOUS SYSTEM SURGERIES AND PROCEDURES	60000-64911	103.24%
EYE AND EAR SURGERIES AND PROCEDURES	65091-69990	91.36%
PSYCHIATRIC AND PSYCHOTHERAPY for MD, DO, and PhD. (Not all BH services are included in this line.)	90791-90899	99.01%
DIALYSIS professional services (facility payments are not included)	90935-90999	94.47%
GASTROENTEROLOGY nonsurgical includes tests, evaluations, studies, procedures	91010-91299	91.21%
<u>OPHTHALMOLOGY</u> nonsurgical	92002-92287	85.40%
EAR, NOSE, THROAT including audiology testing	92502-92700	87.54%
RADIOLOGY AND IMAGING	All radiology codes	116.00%
LABORATORY	70000-79999	100%
<u>CARDIOVASCULAR</u> nonsurgical, but including therapeutic services, monitoring, tests, evaluations, studies, catheterization, echocardiography	92920-93998	94.88%
PULMONARY nonsurgical, including testing and ventilator management	94002-94799	90.14%
NEUROLOGY AND NEUROMUSCULAR nonsurgical including sleep studies, testing and diagnostic	95782-96155	96.24%

procedures		
PHYSICAL MEDICINE therapeutic treatments and modalities	97001-97576	92.10%
EVALUATION AND MANAGEMENT office type visits	99201-99215	86.50%
HOSPITAL INPATIENT inpatient hospital visits, observation, and discharge	99221-99239	87.72%
INPATIENT CONSULTATIONS	99251-99255	Medicare doesn't cover
EMERGENCY DEPARTMENT SERVICES emergency room visits	99281-99285	83.91%
NURSING FACILITY CARE, REST HOME, AND CUSTODIAL CARE SERVICES nursing facility visits	99304-99350	92.27%
MISC. INPATIENT NEONATAL & PEDIATRIC INTENSIVE CARE, CRITICAL CARE, etc.	99466-99486	Medicare doesn't cover

Table 2, below, shows that more than 99 percent of the Medicaid FFS population is Native American, often with access to IHS/tribal health care facilities and providers. Most services at outpatient IHS and tribal health care facilities are paid at outpatient Office and Management and Budget (OMB) rates, as published in the Federal Register and therefore not affected by the fee schedule. HSD/MAD notes that since OMB rates are federally established, the adequacy of these payment rates for ensuring access for Native American Medicaid beneficiaries is outside of the state's control.

Services paid at the OMB rate include:

- Primary Care services
- Physician Specialist services
- Outpatient Behavioral Health services
- Pre- and Post-Natal Obstetric services, including labor and delivery (inpatient services and delivery services are paid in addition to the inpatient OMB rate)
- Dental Health services

Recipient Demographics

In July 2015, there were 78,318 Medicaid recipients in the Medicaid FFS program, of which 78,140 were Native American (99.8%). Given the large majority of Native Americans in the

Medicaid FFS program, it is necessary and important for HSD/MAD to consider recipient access to IHS and other tribal health care providers, including tribal 638 facilities.

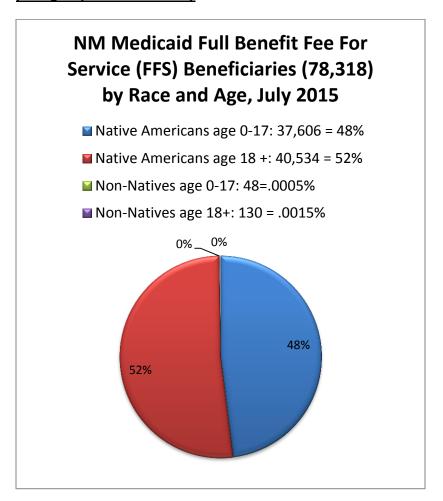
New Mexico is the fifth largest state (geographically) and has 33 counties. The counties are typically much smaller than for most western states, meaning that the population center for each county (usually the county seat) may be relatively close to the population center of another county.

Table 3 (below) shows the Medicaid FFS population by age and county of residence.

<u>Table 3 – NM Medicaid Fee-For-Service Recipient Residence by County July 2015</u>

County	NATIV	'E AMERICANS GROUP	BY AGE	NON-N	AGE GROUP		ALL RECIPIENTS
	0 - 17	18 & above	TOTAL	0 - 17	18 & above	TOTAL	
Bernalillo	4,894	6,136	11,030	9	59	68	11,098
Catron	12	15	27				27
Chaves	25	36	61	2	1	3	64
Cibola	2,426	2,518	4,944		1	1	4,945
Colfax	10	20	30				30
Curry	20	27	47	1		1	48
De Baca	4	3	7				7
Dona Ana	145	200	345	8	7	15	360
Eddy	34	51	85		12	12	97
Grant	17	34	51		1	1	52
Guadalupe	4	4	8				8
Harding							0
Hidalgo	1	2	3				3
Lea	32	25	57	1	6	7	64
Lincoln	118	124	242		3	3	245
Los Alamos	8	13	21				21
Luna	26	36	62		1	1	63
McKinley	12,456	12,765	25,221				25,221
Mora	9	6	15				15
Otero	1,070	992	2,062	1	1	2	2,064
Quay	9	9	18		1	1	19
Rio Arriba	1,133	1,233	2,366	1	9	10	2,376
Roosevelt	17	38	55				55
Sandoval	3,478	3,869	7,347	7	2	9	7,356
San Juan	9,790	10,150	19,940	6	2	8	19,948
San Miguel	61	84	145	1	2	3	148
Santa Fe	650	830	1,480	7	18	25	1,505
Sierra	8	25	33				33
Socorro	532	484	1,016	1	2	3	1,019
Taos	277	386	663				663
Torrance	42	56	98				98
Union	1	2	3				3
Valencia	297	361	658	3	2	5	663
TOTAL	37,606	40,534	78,140	48	130	178	78,318

Table 4: <u>Total NM Full-Benefit Fee-For-Service population by race (two groups) and age</u> (two groups: 0-17 and 18+)



This analysis of age groups show that just under half (48%) of FFS recipients are under age 18, while slightly more than half (52%) are 18 years or older.

HSD/MAD notes that 84 percent of the Medicaid FFS population lives in just seven New Mexico counties.

Approximately 58 percent of Medicaid FFS recipients reside in McKinley County
 (associated with Gallup, the 11th largest city in New Mexico) and the adjoining San
 Juan County (associated with Farmington, the 6th largest city in New Mexico). These
 counties in northwestern New Mexico lie primarily within the Navajo Nation.
 Together, they constitute about 45,000 of the 78,318 FFS recipients statewide.

Both county populations are served by health care resources in the cities of Gallup and Farmington, respectively, several IHS and tribal 638 facility providers throughout

those counties, and across the border in Arizona, as well as additional providers in adjacent counties and across state lines in Durango, Colorado.

All but eight FFS recipients in these two counties are Native American. Both counties have some of the largest IHS facilities in the state at several locations within the counties and across the border in Arizona.

Approximately 26 percent of the Medicaid FFS population lives in counties that are
considered "urban" or part of an "urban corridor", which covers Bernalillo, Sandoval
and Valencia counties, and which offer significant urban-scale health care facilities
and services from many providers within a relatively close driving distance.

These urban areas include the Albuquerque metropolitan area (the largest city in the state) and Rio Rancho (the 3rd largest city in the state). Doña Ana County with Las Cruces (the second largest city in the state) is also considered urban.

Two smaller cities in the adjacent counties of Santa Fe and Los Alamos also provide some urban-like health care services.

 The remaining 16 percent of the Medicaid FFS population live in other counties across New Mexico with varying characteristics.

According to www.frontierus.org, all of the counties in New Mexico are considered frontier counties except for the following: Bernalillo, Doña Ana, Los Alamos, Sandoval, Santa Fe, and Valencia.

The underserved designation by HRSA, when applicable, is indicated on the tables associating services with counties. However, because of the distribution of the FFS population and because the population center of one county is often close to the population center of another county, the area in which residents of a county routinely seek health care services is often in an adjoining county. Therefore, the health service area in which the resident of a county typically seeks health care may be in what is called a "health care service area".

The tables below that relate to each service consider the number providers available in the recipients' *county* as Table A (such as Table 8 A or Table 10 A); while the corresponding larger *Healthcare Service Area* is always shown in Table B (such as Table 8 B or Table 10 B).

Native American recipient access, even for those geographically close to IHS or tribal health care facilities, must also be considered from the aspect of:

- Recipient choice of providers.
- Access to services following referrals from IHS or tribal facilities.
- Access to services not provided through IHS or tribal facilities.
- Timely access to emergency services.

Table 5 (below) shows the numbers and percentages of Native Americans receiving care during Calendar Year 2015 in the following settings:

- Only from IHS and tribal health care facilities.
- Only from non-IHS/non-tribal health care facilities.
- From both IHS/tribal health care facilities and by non-IHS/non-tribal providers.

In 2015, the largest number of recipients, approximately 33 percent, was seen in both IHS/tribal settings *and* non-IHS/non-tribal settings. This varies significantly from county to county, depending on the IHS or tribal facilities in the county or nearby, as well as by the number of non-IHS/non-tribal providers nearby.

Generally, the non-IHS/non-tribal providers rendering the most services to Native Americans are hospital facility providers in the counties with the largest numbers of Native Americans (McKinley and San Juan counties), the University of New Mexico Hospital (UNMH), and behavioral health and vision providers. This may indicate that behavioral health and vision service needs cannot always be met by IHS or tribal facility providers.

Table 5 – <u>Native Americans Receiving Care in IHS or Tribal Setting</u>

County	Number of NA Recipients with only IHS or Tribal Facility Services	Percent of NA Recipients with only IHS or Tribal Facility Services	Number of NA Recipients with only non-IHS or non-Tribal Service Providers	Percent of NA Recipients with only non-IHS or non-Tribal Service Providers	Number of NA Recipients with Services from both IHS or Tribal Facilities and Non-IHS Providers	Percent of NA Recipients with Services from both IHS or Tribal Facilities and Non-IHS Providers	Number of NA Recipients with No Services During Review Period	Percent of NA Recipients with No Services During Review Period	Total Native American Recipients
Bernalillo	1,462	13.25%	4,269	38.70%	3,183	28.86%	2116	19.18%	11,030
Catron	7	25.93%	7	25.93%	13	48.15%	0	0.00%	27
Chaves	4	6.56%	46	75.41%	1	1.64%	10	16.39%	61
Cibola	1,318	26.66%	1,047	21.18%	1,801	36.43%	778	15.74%	4,944
Colfax	3	10.00%	12	40.00%	6	20.00%	9	30.00%	30
Curry	1	2.13%	28	59.57%	4	8.51%	14	29.79%	47
De Baca	0	0.00%	7	100.00%	0	0.00%	0	0.00%	7
Dona Ana	19	5.51%	205	59.42%	21	6.09%	100	28.99%	345
Eddy	1	1.18%	52	61.18%	6	7.06%	26	30.59%	85
Grant	3	5.88%	27	52.94%	10	19.61%	11	21.57%	51
Guadalupe	0	0.00%	7	87.50%	0	0.00%	1	12.50%	8
Harding	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Hidalgo	1	33.33%	1	33.33%	1	33.33%	0	0.00%	3
Lea	3	5.26%	33	57.89%	0	0.00%	21	36.84%	57
Lincoln	27	11.16%	81	33.47%	94	38.84%	40	16.53%	242
Los Alamos	1	4.76%	4	19.05%	10	47.62%	6	28.57%	21
Luna	5	8.06%	32	51.61%	10	16.13%	15	24.19%	62
McKinley	10,934	43.35%	2,806	11.13%	7,739	30.68%	3742	14.84%	25,221
Mora	5	33.33%	7	46.67%	1	6.67%	2	13.33%	15
Otero	552	26.77%	276	13.39%	1,053	51.07%	181	8.78%	2,062
Quay	0	0.00%	13	72.22%	1	5.56%	4	22.22%	18
Rio Arriba	837	35.38%	260	10.99%	974	41.17%	295	12.47%	2,366
Roosevelt	5	9.09%	26	47.27%	8	14.55%	16	29.09%	55
Sandoval	1,740	23.68%	1,700	23.14%	2,922	39.77%	985	13.41%	7,347
San Juan	4,388	22.01%	6,336	31.78%	5,904	29.61%	3312	16.61%	19,940
San Miguel	18	12.41%	59	40.69%	27	18.62%	41	28.28%	145
Santa Fe	332	22.43%	371	25.07%	536	36.22%	241	16.28%	1,480
Sierra	4	12.12%	23	69.70%	0	0.00%	6	18.18%	33
Socorro	252	24.80%	246	24.21%	426	41.93%	92	9.06%	1,016
Taos	123	18.55%	151	22.78%	301	45.40%	88	13.27%	663
Torrance	6	6.12%	49	50.00%	19	19.39%	24	24.49%	98
Union	0	0.00%	0	0.00%	2	66.67%	1	33.33%	3
Valencia	109	16.57%	237	36.02%	181	27.51%	131	19.91%	658
Total	22,160	28.36%	18,418	23.57%	25,254	32.32%	12,308	15.75%	78,140

The above chart (Table 5) shows that of the 65,832 Native Americans receiving services in 2015, 72 percent received some services at IHS or tribal health care facilities, emphasizing the important role that these facilities play in the delivery of services in the New Mexico FFS program.

These providers are included in this analysis because they can provide primary care services, some physician specialist services, and pre- and post-natal obstetric services, as well as some outpatient behavioral health services. Some facilities also provide dental services.

Because of the manner in which claims are billed, HSD/MAD can identify when an IHS or tribal health care provider is rendering dental and behavioral health services.

Table 6 (below) provides a list of New Mexico IHS/Tribal Providers (facilities) and their locations.

Table 6: List of NM Medicaid IHS and Tribal 638 Providers

IHS or Tribal Facility Name	Location
ACOMA CANONCITO LAGUNA PHS	ACOMA
ALBUQUERQUE IHS DENTAL CLINIC	ALBUQUERQUE
ALBUQUERQUE PHS INDIAN HOSPITAL	ALBUQUERQUE
FSIP INC BEHAVIORAL HEALTH SERVICES	BERNALILLO
PUEBLO OF SANDIA	BERNALILLO
SANTA ANA HEALTH CENTER	BERNALILLO
DZILTH-NA-O-DITH-HLE HEALTH CENTER	BLOOMFIELD
CHINLE COMPREHENSIVE HEALTH CARE FACILITY	CHINLE
COCHITI HEALTH CLINIC	COCHITI
PUEBLO DE COCHITI	COCHITI PUEBLO
CROWNPOINT PHS INDIAN HOSP	CROWNPOINT
NN/DBHS-CROWNPOINT OTC	CROWNPOINT
CROWNPOINT-PUEBLO PINTADO CLI	CUBA
JICARILLA SERVICE UNIT	DULCE
EIGHT NTHRN INDIAN PUEBLOS CNCL INC	ESPANOLA
SANTA CLARA HEALTH CENTER	ESPANOLA
SANTA CLARA PUEBLO	ESPANOLA
FT DEFIANCE INDIAN HOSPITAL	FORT DEFIANCE
GALLUP INDIAN MEDICAL CENTER	GALLUP
SOUTHERN COLORADO UTE SERVICE	IGNACIO
ISLETA DENTAL CLINIC	ISLETA
ISLETA HEALTH CENTER	ISLETA

PUEBLO OF ISLETA BEHAVIORAL HEALTH	ISLETA
JEMEZ HEALTH CENTER	JEMEZ PUEBLO
SANTO DOMINGO BEHAVIORAL HLTH PROG	KEWA
ALAMO NAVAJO HEALTH CENTER	MAGDALENA
MESCALERO APACHE TRIBAL HLTH HUMAN	MESCALERO
MESCALERO PHS INDIAN HOSPITAL	MESCALERO
UTAH NAVAJO HEALTH SYSTEM INC	MONTEZUMA CREEK
LAGUNA DENTAL CLINIC	PARAJE
PINE HILL HEALTH CENTER	PINE HILL
SAN FELIPE HEALTH CLINIC	SAN FELIPE PUEBLO
SAN FELIPE PUEBLO	SAN FELIPE PUEBLO
SANOSTEE HEALTH STATION	SANOSTEE
SANTA FE INDIAN HOSPITAL	SANTA FE
SANTA FE INDIAN SCHOOL	SANTA FE
SANTO DOMINGO HEALTH CENTER	SANTO DOMINGO
DBHS SHIPROCK TRTMNT CTR OUTPATIENT	SHIPROCK
NORTHERN NAVAJO MEDICAL CENTER	SHIPROCK
TAOS PUEBLO HEALTH COMM SVCS DIV	TAOS
TAOS/PICURIS HEALTH CENTER	TAOS
FOUR CORNERS REGIONAL HEALTH CENTER	TEEC NOS POS
CROWNPOINT-THOREAU CLINIC	THOREAU
TOADLENA HEALTH STATION	TOADLENA
TOHAJIILEE BHS	TO'HAJIILEE
INDIAN HEALTH SERVICE	TOHAJIILEE
TOHATCHI HEALTH CENTER	TOHATCHI
UTE MOUNTAIN UTE HEALTH CENTER	TOWAOC
TUBA CITY REGIONAL HEALTH CARE	TUBA CITY
ZIA HEALTH CENTER	ZIA PUEBLO
PUEBLO OF ZUNI - TEEN HEALTH CENTER	ZUNI
ZUNI INDIAN HOSPITAL	ZUNI
ZUNI RECOVERY CENTER	ZUNI

Healthcare Service Areas

New Mexico is divided into 33 counties. Most of the counties are rural in nature but have a single population center where the majority of the residents of the county reside. Usually, but not always, this population center is the county seat.

In order to better identify the characteristics of each county, the number of population centers in each county are indicated on the following Table 7, unless the area is urban or semi-urban.

The population center may be small. The three smallest population centers in counties range between 1,606 and 2,999 residents.

Typically these small counties with low populations and small population centers rely on cities or towns in other areas for commercial interactions as wells as healthcare.

This plan considered the relationship that one county has with an adjacent county by including, in Table 7, areas where recipients may have additional healthcare resources available nearby. This inclusion is necessary to accurately reflect healthcare access in New Mexico.

In determining the service areas, the following were considered:

- Distance from a population center within the same county or an adjacent county.
- Travel time and difficulty to reach a population center with available medical services.
- Functional association between one area and another area with available medical services.
- Numbers and types of various medical service providers available in the service area in relation to the county population.

The analysis shows that most of the FFS population in rural areas lives within a one-hour drive-time to access health care services. (One hour of travel time in most areas of New Mexico would cover approximately 70 miles.) These services may be accessed in a nearby city or adjacent county, at an IHS or tribal health care provider, or in nearby cities across state lines in a neighboring state. A one-hour drive-time is considered reasonable and accessible given the rural nature of New Mexico. This is consistent with drive-times for the general population in commercial healthcare plans in our large, highly-rural state, as well as for our managed care population.

Table 3 (above) shows the distribution of FFS recipients in specific counties in New Mexico and the closest healthcare services areas to those counties. Table 7 (below) shows the approximate mileage to these additional healthcare resources. The miles stated is the distance from the largest population area in the county to the city or town indicated as having other available healthcare resources. The population for each county is from 2010 census data. Table 7 also notes the number of population centers in each county, as well as nearby population centers in adjacent counties, which constitute the "healthcare service"

area". Counties are identified as urban, semi-urban, and rural, with driving distances noted for the nearby health care service centers.

Table 7: <u>NM Counties and "Healthcare Service Areas" with the number of population centers therein</u>

Table 7 Additional Healthcare Service Areas Available to Residents of Each County

Main Beneficiary Residence County	Urban / Semi- Urban / Rural	County Population	Number of FFS Recip- ients	Number of Popu- lation Centers	Under- served Desig- nation	Other Nearby Cities and Towns with Healthcare Services Available to County Residents
Bernalillo	Urban	676,685	11,098	Urban Corridor	No	Bernalillo, Sandoval, and Valencia counties form an urban corridor in which the largest population centers essentially border each other. Albuquerque to Rio Rancho is 16 miles, Rio Rancho to Los Lunas is 38 miles; Albuquerque to Los Lunas is 25 miles. 43% of the state's population resides in this area.
Catron	Rural	3,456	27	0	Yes	Silver City - 98 miles; Socorro - 109 miles
Chaves	Semi- Urban	65,764	64	1	Yes	Artesia - 41 miles which is not underserved; Ruidoso 75 - miles
Cibola	Rural	27,329	4,945	1	Yes	Gallup - 57 miles; Albuquerque - 80 miles which is not underserved
Colfax	Rural	12,414	30	1	yes	Trinidad CO - 22 miles; Wagon Mound - 65 miles
Curry	Rural	50,398	48	1	No	Portales -19 miles; Fort Sumner - 57 miles
De Baca	Rural	1,828	7	1	Yes	Clovis - 57 miles which is not underserved
Dona Ana	Urban	214,295	360	1	Partially	El Paso TX - 63 miles
Eddy	Rural	57,578	97	2	No	Hobbs, a semi urban area - 78 miles
Grant	Rural	28,609	52	1	No	Lordsburg miles - 41 miles; Deming - 53 miles
Guadalup e	Rural	4,371	8	1	Yes	Las Vegas 57 -miles; Tucumcari - 58 miles
Harding	Rural	698	0	0	Yes	Wagon Mound 35 miles; Clayton 88 miles; Tucumcari 92 miles
Hidalgo	Rural	4,423	3	1	Yes	Silver City - 37 miles; Deming - 58 miles
Lea	Semi- Urban	71,180	64	1	Yes	Alamogordo - 70 miles; Seminole TX - 29 miles
Lincoln	Rural	19,420	245	1	Yes	Alamogordo - 51 miles; Roswell - 75 miles
Los Alamos	Urban	17,785	21	1	No	Espanola - 18 miles; Santa Fe - 33 miles
Luna	Rural	24,518	63	1	No	Las Cruces (urban area) - 52 miles; Silver City - 53 miles; Lordsburg - 58 miles
McKinley	Rural	76,708	25,221	1	Yes	Window Rock AZ 26 miles; Ft. Defiance AZ 31 miles; Grants 62 miles
Mora	Rural	4,596	15	1	Yes	Las Vegas - 43 miles
Otero	Rural	64,362	2,064	1	No	Ruidoso 58 - miles; El Paso TX - 66 miles
Quay	Rural	8,455	19	1	Yes	Santa Rosa - 60 miles
Rio Arriba	Rural	39,465	2,376	1	Partially	Santa Fe - 25 miles
Roosevelt	Rural	19,120	55	1	Yes	Clovis - 57 miles
San Juan	Semi- Urban	118,737	19,948	2	Yes	Durango CO - 51 miles
San	Rural	27,967	148	1	No	Santa Fe - 63 miles

Miguel						
Sandoval	Urban	139,394	7,356	Urban Corridor	Partially	Bernalillo, Sandoval, and Valencia counties form an urban corridor in which the largest population centers essentially border each other. Albuquerque to Rio Rancho is 16 miles, Rio Rancho to Los Lunas is 38 miles; Albuquerque to Los Lunas is 25 miles. 43% of the state's population resides in this area.
Santa Fe	Urban	148,686	1,505	1	Partially	Albuquerque - 64 miles; Rio Rancho - 57 miles
Sierra	Rural	11,282	33	1	Yes	Las Cruces - 64 miles
Socorro	Rural	17,256	1,019	1	Yes	Belen NM 43 miles; Los Lunas - 52 miles; Albuquerque 78 miles
Taos	Rural	32,907	663	1	No	Santa Fe - 69 miles
Torrance	Rural	15,485	98	1	Yes	Albuquerque - 38 miles; Santa Rosa - 54 miles
Union	Rural	4,201	3	1	Yes	Boise City OK - 43 miles; Raton - 83 miles
Valencia	Urban	75,737	663	Urban Corridor	Yes	Bernalillo, Sandoval, and Valencia counties form an urban corridor in which the largest population centers essentially border each other. Albuquerque to Rio Rancho is 16 miles, Rio Rancho to Los Lunas is 38 miles; Albuquerque to Los Lunas is 25 miles. 43% of the state's population resides in this area.
TOTA	LS:	2,085,109	78,318			

When available, the categorization of NM counties by the Health Resource and Services Administration (HRSA) with regards to access to preventive and primary healthcare services is noted. The Health Professional Shortage Areas (HPSAs) are designated by HRSA based on shortages of providers and may be based solely on the county resources without always considering the medical services available in adjacent counties. Of the 33 counties in New Mexico, HRSA considers 20 counties as "underserved" and four counties as "partially underserved."

Analysis of Provider Access for Six Service Categories

In this access review, we looked at six categories of health care services and the providers of those services:

- Primary Care services
- Physician Specialist services
- Behavioral Health services
- Pre- and post-Natal Obstetric services, including labor and delivery
- Home Health services
- Dental Health services

In evaluating access to care, we considered the Medicaid FFS recipients and numbers and types of providers within each county. Those tables (tables A) are labelled "County Area Only". However, as stated above, in order to understand healthcare access to recipients,

there is always a second table (tables B) labelled "Healthcare Service Area" which counts the healthcare providers that are available to recipients in the county as well as the expanded healthcare service areas for each county as indicated in Table 7.

The following service categories were analyzed to compare the number of Medicaid FFS recipients by county to the number of providers in the county and surrounding service areas, as noted above in Table 7 (above).

Data for the following tables are from the NM Medicaid provider enrollment system and the NM Medicaid recipient enrollment system.

	TABLE 8 A -COUNTY AREA ONLY - PRIMARY CARE COUNTIES FFS POPULATION PRIMARY CARE PROVIDERS IN SERVICE AREA												
COUN	TIES	FFS F	POPULA	TION	PR	RVICE A	AREA						
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERICANS	TOTAL	Outpatient Hospital & ER	IHS or TRIBAL FACILITIES	FQHCS, RHC, HB- RHC	GROUP PRACTICES & OTHER CLINICS	INDIVIDUAL PRACTITIONERS	SCHOOLS	SCHOOL BASED HEALTH CENTERS	TOTAL	
Bernalillo		11,030	68	11,098	5	5	9	95	2,048	3	10	2,175	
Catron	underserved	27		27			2		3			5	
Chaves	underserved	61	3	64	2		3	23	129	1	4	162	
Cibola	underserved	4,944	1	4,945	1	5	2	4	53	2		67	
Colfax	underserved	30		30	1		1	4	36	1	2	45	
Curry		47	1	48	1		2	11	93	1		108	
De Baca	underserved	7		7			1	1	4		1	7	
Dona Ana	partially	345	15	360	2		19	46	339	2	4	412	
Eddy		85	12	97	2		5	14	83	3		107	
Grant		51	1	52	1		8	6	56	2		73	
Guadalupe	underserved	8		8	1		1	2	8	1	1	14	
Harding	underserved			0			1		2		1	4	
Hidalgo	underserved	3		3			3	1	5			9	
Lea	underserved	57	7	64	2		4	10	75	2		93	
Lincoln	underserved	242	3	245	1		3	3	31	1	1	40	
Los Alamos		21		21	1			9	48			58	
Luna		62	1	63	1		4	8	24			37	
McKinley	underserved	25,221		25,221	1	10	4	5	265	2		287	
Mora	underserved	15		15			2	1	8	1	1	13	
Otero		2,062	2	2,064	1	2	5	8	89	2		107	
Quay	underserved	18	1	19	1		1	5	38	1	1	47	
Rio Arriba	partially	2,366	10	2,376	1	4	11	4	66	5	1	92	
Roosevelt	underserved	55		55	1		2	4	25	1		33	
Sandoval	partially	7,347	9	7,356	1	12	9	6	137	3	2	170	
San Juan	underserved	19,940	8	19,948	1	5	1	24	261	4		296	
San Miguel		145	3	148	1		6	9	55	4	2	77	
Santa Fe	partially	1,480	25	1,505	1	2	8	59	315	3		388	
Sierra	underserved	33		33			3	6	25	1		35	
Socorro	underserved	1,016	3	1,019	1	1	3	2	38	1		46	
Taos		663		663	1	2	8	10	91	4	2	118	
Torrance	underserved	98		98			3	1	12	1	1	18	
Union	underserved	3		3	1			2	4			7	
Valencia	underserved	658	5	663		1	2	6	42	2	1	54	
Total		78,140	178	78,318	33	49	136	389	4,508	54	35	5,204	

	TABLE 8 B - HEALTHSERVICE AREA - PRIMARY CARE COUNTIES FFS POPULATION PRIMARY CARE PROVIDERS IN SERVICE AREA												
COUN	TIES	FFS P	OPULA	ATION	P	RIMA	RY CAI	RE PRO	/IDERS II	N SER\	/ICE A	REA	
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERI- CANS	TOTAL	Outpatient Hospital & ER	IHS or TRIBAL FACILITIES	FQHCS, RHC, HB-RHC	GROUP PRACTICES and OTHER CLINICS	INDIVIDUAL PRACTITIONERS	SCHOOLS	SCHOOL BASED HEALTH CENTERS	TOTAL	
Bernalillo		11,030	68	11,098	6	18	20	107	2227	8	13	2399	
Catron	underserved	27		27	2	1	13	8	97	3	0	124	
Chaves	underserved	61	3	64	4	0	5	27	179	4	5	224	
Cibola	underserved	4,944	1	4,945	7	20	15	104	2366	7	10	2529	
Colfax	underserved	30		30	2	0	4	6	49	2	3	66	
Curry		47	1	48	2	0	5	16	122	2	1	148	
De Baca	underserved	7		7	1	0	3	12	97	1	1	115	
Dona Ana	partially	345	15	360	12	0	19	125	730	2	4	892	
Eddy		85	12	97	4	0	9	24	158	5	0	200	
Grant		51	1	52	2	0	15	15	85	2	0	119	
Guadalupe	underserved	8		8	3	0	8	16	101	6	4	138	
Harding	underserved			0	2	0	4	8	52	2	3	71	
Hidalgo	underserved	3		3	2	0	15	15	85	2	0	119	
Lea	underserved	57	7	64	5	0	9	26	172	5	0	217	
Lincoln	underserved	242	3	245	3	0	4	25	155	2	5	194	
Los Alamos		21		21	3	4	12	72	407	5	1	504	
Luna		62	1	63	4	0	34	61	424	4	4	531	
McKinley	underserved	25,221		25,221	2	15	6	9	318	4	0	354	
Mora	underserved	15		15	1	0	8	10	63	5	3	90	
Otero		2,062	2	2,064	12	2	5	90	509	3	1	622	
Quay	underserved	18	1	19	2	0	2	7	46	2	2	61	
Rio Arriba	partially	2,366	10	2,376	2	6	19	63	381	8	1	480	
Roosevelt	underserved	55		55	2	0	4	15	118	2	0	141	
Sandoval	partially	7,347	9	7,356	6	18	20	107	2227	8	13	2399	
San Juan	underserved	19,940	8	19,948	3	5	1	38	338	4	0	389	
San Miguel		145	3	148	2	2	14	68	370	7	2	465	
Santa Fe	partially	1,480	25	1,505	7	19	26	160	2500	9	12	2733	
Sierra	underserved	33		33	2	0	22	52	364	3	4	447	
Socorro	underserved	1,016	3	1,019	6	4	14	100	2108	6	10	2248	
Taos		663		663	2	4	16	69	406	7	2	506	
Torrance	underserved	98		98	6	2	13	95	2048	5	11	2180	
Union	underserved	3		3	2	0	1	6	40	1	2	52	
Valencia	underserved	658	5	663	6	18	20	107	2227	8	13	2399	
Total		78,140	178	78,318	127	138	385	1,663	21,569	144	130	24156	

TABLE 9 A: COUNTY AREA ONLY - SPECIALTY CARE

COUN	ITIES	FFS P	OPULA	ATION	SPE	CIALT		VIDER AREA	S IN SEI	RVICE
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERICANS	TOTAL	Outpatient Hospital & ER	IHS or TRIBAL FACILITIES	FQHCS, RHC, HB- RHC	GROUP PRACTICES & OTHER CLINICS	INDIVIDUAL PRACTITIONERS	TOTAL
Bernalillo	not established	11,030	68	11,098	5	5	9	110	1,404	1,533
Catron	not established	27		27			2			2
Chaves	not established	61	3	64	2		3	12	68	85
Cibola	not established	4,944	1	4,945	1	5	2	2	6	16
Colfax	not established	30		30	1		1	4	23	29
Curry	not established	47	1	48	1		2	7	54	64
De Baca	not established	7		7			1			1
Dona Ana	not established	345	15	360	2		19	47	207	275
Eddy	not established	85	12	97	2		5	6	55	68
Grant	not established	51	1	52	1		8	4	28	41
Guadalupe	not established	8		8	1		1		1	3
Harding	not established			0			1			1
Hidalgo	not established	3		3			3		1	4
Lea	not established	57	7	64	2		4	8	35	49
Lincoln	not established	242	3	245	1		3		16	20
Los Alamos	not established	21		21	1			3	36	40
Luna	not established	62	1	63	1		4	3	14	22
McKinley	not established	25,221		25,221	1	10	4	4	201	220
Mora	not established	15		15			2			2
Otero	not established	2,062	2	2,064	1	2	5	6	53	67
Quay	not established	18	1	19	1		1	1	16	19
Rio Arriba	not established	2,366	10	2,376	1	4	11		22	38
Roosevelt	not established	55		55	1		2		6	9
Sandoval	not established	7,347	9	7,356	1	12	9	10	55	87
San Juan	not established	19,940	8	19,948	1	5	1	22	203	232
San Miguel	not established	145	3	148	1		6	4	22	33
Santa Fe	not established	1,480	25	1,505	1	2	8	40	200	251
Sierra	not established	33		33			3	2	6	11
Socorro	not established	1,016	3	1,019	1	1	3		16	21
Taos	not established	663		663	1	2	8	4	51	66
Torrance	not established	98		98			3		2	5
Union	not established	3		3	1				3	4
Valencia	not established	658	5	663		1	2	2	5	10
Total		78,140	178	78,318	33	49	136	301	2,809	3,328

TABLE 9 B: HEALTHCARE SERVICE AREAS - SPECIALTY CARE

cou	NTIES	FFS PC	OPULA	ATION						
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERICANS	TOTAL	Outpatient Hospital & ER	IHS or TRIBAL FACILITIES	FQHCS, RHC, HB- RHC	GROUP PRACTICES and OTHER CLINICS	INDIVIDUAL PRACTITIONERS	TOTAL
Bernalillo	not established	11,030	68	11,098	6	18	20	122	1464	1624
Catron	not established	27		27	2	1	13	4	44	62
Chaves	not established	61	3	64	4	0	5	12	98	115
Cibola	not established	4,944	1	4,945	7	20	15	116	1611	1762
Colfax	not established	30		30	2	0	4	4	24	32
Curry	not established	47	1	48	2	0	5	7	60	72
De Baca	not established	7		7	1	0	3	7	54	64
Dona Ana	not established	345	15	360	12	0	19	123	662	804
Eddy	not established	85	12	97	4	0	9	14	90	113
Grant	not established	51	1	52	2	0	15	7	43	65
Guadalupe	not established	8		8	3	0	8	5	39	52
Harding	not established			0	2	0	4	1	19	24
Hidalgo	not established	3		3	2	0	15	7	43	65
Lea	not established	57	7	64	5	0	9	14	93	116
Lincoln	not established	242	3	245	3	0	4	12	86	102
Los Alamos	not established	21		21	3	4	12	43	256	315
Luna	not established	62	1	63	4	0	34	54	250	338
McKinley	not established	25,221		25,221	2	15	6	6	207	234
Mora	not established	15		15	1	0	8	4	22	34
Otero	not established	2,062	2	2,064	12	2	5	82	525	614
Quay	not established	18	1	19	2	0	2	1	17	20
Rio Arriba	not established	2,366	10	2,376	2	6	19	40	222	287
Roosevelt	not established	55		55	2	0	4	7	60	71
Sandoval	not established	7,347	9	7,356	6	18	20	122	1464	1624
San Juan	not established	19,940	8	19,948	3	5	1	41	284	331
San Miguel	not established	145	3	148	2	2	14	44	222	282
Santa Fe	not established	1,480	25	1,505	7	19	26	160	1659	1864
Sierra	not established	33		33	2	0	22	49	213	284
Socorro	not established	1,016	3	1,019	6	4	14	109	1412	1539
Taos	not established	663		663	2	4	16	44	251	315
Torrance	not established	98		98	6	2	13	107	1394	1516
Union	not established	3		3	2	0	1	4	26	31
Valencia	not established	658	5	663	6	18	20	122	1464	1624
Total		78,140	178	78,318	127	138	385	1,494	14,378	16395

TABLE 10 A: COUNTRY AREA ONLY - OBSTESTRICAL CARE

COUN	TIES	FFS P	FFS POPULATION OBSTETRICAL PROVIDERS IN SERVICE AREA							
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERICANS	TOTAL	Outpatient Hospital & ER	IHS or TRIBAL FACILITIES	FQHCS, RHC, HB- RHC	GROUP PRACTICES & OTHER CLINICS OBSTETRICS	INDIVIDUAL PRACTITIONERS OBSTETRICS	TOTAL
Bernalillo	not established	11,030	68	11,098	5	5	9	12	253	284
Catron	not established	27		27			2			2
Chaves	not established	61	3	64	2		3		8	13
Cibola	not established	4,944	1	4,945	1	5	2	1	3	12
Colfax	not established	30		30	1		1		6	8
Curry	not established	47	1	48	1		2		10	13
De Baca	not established	7		7			1			1
Dona Ana	not established	345	15	360	2		19	3	50	74
Eddy	not established	85	12	97	2		5	1	9	17
Grant	not established	51	1	52	1		8		7	16
Guadalupe	not established	8		8	1		1			2
Harding	not established			0			1			1
Hidalgo	not established	3		3			3		1	4
Lea	not established	57	7	64	2		4	1	4	11
Lincoln	not established	242	3	245	1		3		2	6
Los Alamos	not established	21		21	1			1	3	5
Luna	not established	62	1	63	1		4	1	3	9
McKinley	not established	25,221		25,221	1	10	4		33	48
Mora	not established	15		15			2			2
Otero	not established	2,062	2	2,064	1	2	5		8	16
Quay	not established	18	1	19	1		1			2
Rio Arriba	not established	2,366	10	2,376	1	4	11	1	7	24
Roosevelt	not established	55		55	1		2		1	4
Sandoval	not established	7,347	9	7,356	1	12	9		7	29
San Juan	not established	19,940	8	19,948	1	5	1	5	31	43
San Miguel	not established	145	3	148	1		6	1	8	16
Santa Fe	not established	1,480	25	1,505	1	2	8	5	27	43
Sierra	not established	33		33			3		1	4
Socorro	not established	1,016	3	1,019	1	1	3		6	11
Taos	not established	663		663	1	2	8	3	9	23
Torrance	not established	98		98			3			3
Union	not established	3		3	1					1
Valencia	not established	658	5	663		1	2		2	5
Total		78,140	178	78,318	33	49	136	35	499	752

TABLE 10 B: HEALTHCARE SERVICE AREA - OBSTESTRICAL CARE

COUN	ITIES	FFS P	OPULA	TION	OBSTETRICAL PROVIDERS IN SERVICE AREA					
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERICANS	TOTAL	Outpatient Hospital & ER	IHS or TRIBAL FACILITIES	FQHCS, RHC, HB- RHC	GROUP PRACTICES and OTHER CLINICS OBSTETRICS	INDIVIDUAL PRACTITIONERS OBSTETRICS	TOTAL
Bernalillo	not established	11,030	68	11,098	6	18	20	12	262	312
Catron	not established	27		27	2	1	13	0	13	27
Chaves	not established	61	3	64	4	0	5	0	11	16
Cibola	not established	4,944	1	4,945	7	20	15	13	289	337
Colfax	not established	30		30	2	0	4	0	7	11
Curry	not established	47	1	48	2	0	5	0	11	16
De Baca	not established	7		7	1	0	3	0	10	13
Dona Ana	not established	345	15	360	12	0	19	21	106	146
Eddy	not established	85	12	97	4	0	9	2	13	24
Grant	not established	51	1	52	2	0	15	1	11	27
Guadalupe	not established	8		8	3	0	8	1	8	17
Harding	not established			0	2	0	4	0	0	4
Hidalgo	not established	3		3	2	0	15	1	11	27
Lea	not established	57	7	64	5	0	9	3	14	26
Lincoln	not established	242	3	245	3	0	4	0	10	14
Los Alamos	not established	21		21	3	4	12	7	37	60
Luna	not established	62	1	63	4	0	34	4	61	99
McKinley	not established	25,221		25,221	2	15	6	1	36	58
Mora	not established	15		15	1	0	8	1	8	17
Otero	not established	2,062	2	2,064	12	2	5	18	66	91
Quay	not established	18	1	19	2	0	2	0	0	2
Rio Arriba	not established	2,366	10	2,376	2	6	19	6	34	65
Roosevelt	not established	55		55	2	0	4	0	11	15
Sandoval	not established	7,347	9	7,356	6	18	20	12	262	312
San Juan	not established	19,940	8	19,948	3	5	1	8	45	59
San Miguel	not established	145	3	148	2	2	14	6	35	57
Santa Fe	not established	1,480	25	1,505	7	19	26	17	287	349
Sierra	not established	33		33	2	0	22	3	51	76
Socorro	not established	1,016	3	1,019	6	4	14	11	252	281
Taos	not established	663		663	2	4	16	8	36	64
Torrance	not established	98		98	6	2	13	11	244	270
Union	not established	3		3	2	0	1	0	6	7
Valencia	not established	658	5	663	6	18	20	12	262	312
Total		78,140	178	78,318	127	138	385	179	2,509	3211

TABLE 11A: COUNTY AREA ONLY - BEHAVIORAL HEALTH SERVICES

COUN	NTIES	FFS P	OPULA	TION									
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMER-ICANS	NON NATIVE AMERI-CANS	TOTAL	IHS & Tribal Facilities with BH services	FQHCS, RHC, HB-RHC with BH Services	Psych Hospitals or Units	BH Agencies, CMHCs, Core Service Agencies	BH Group Practices	BH INDIVIDUAL PRACTITIONERS	Schools	School Based Health Centers	TOTAL
Bernalillo		11,030	68	11,098	2	3	4	91	104	1,687	3	10	1,904
Catron	underserved	27		27		2				2			4
Chaves	underserved	61	3	64		1		7	7	55	1	4	75
Cibola	underserved	4,944	1	4,945	4	2		2	1	21	2		32
Colfax	underserved	30		30		1		1	2	20	1	2	27
Curry		47	1	48				6	3	70	1		80
De Baca	underserved	7		7		1		1		5		1	8
Dona Ana	partially	345	15	360		13	2	25	30	375	2	4	451
Eddy		85	12	97		4		8		52	3		67
Grant		51	1	52		2	1	7	1	73	2		86
Guadalupe	underserved	8		8						7	1	1	9
Harding	underserved			0								1	1
Hidalgo	underserved	3		3		1				4			5
Lea	underserved	57	7	64		1	1	2	1	49	2		56
Lincoln	underserved	242	3	245				2	1	21	1	1	26
Los Alamos		21		21				1	2	17			20
Luna		62	1	63		1		1		19			21
McKinley	underserved	25,221		25,221	6	4		2	2	61	2		77
Mora	underserved	15		15		2				5	1	1	9
Otero		2,062	2	2,064	1	4	1	4	3	84	2		99
Quay	underserved	18	1	19				3	2	8	1	1	15
Rio Arriba	partially	2,366	10	2,376	3	8		5	1	59	5	1	82
Roosevelt	underserved	55		55		1		2	2	17	1		23
Sandoval	partially	7,347	9	7,356	9	8		12	16	189	3	2	239
San Juan	underserved	19,940	8	19,948	2	1		8	8	143	4		166
San Miguel		145	3	148		3		7	1	78	4	2	95
Santa Fe	partially	1,480	25	1,505	2	7	1	28	24	433	3		498
Sierra	underserved	33		33				4		42	1		47
Socorro	underserved	1,016	3	1,019	1	2		1		12	1		17
Taos		663		663	1	7		8	9	110	4	2	141
Torrance	underserved	98		98		3		1		23	1	1	29
Union	underserved	3		3						3			3
Valencia	underserved	658	5	663	1			5	4	70	2	1	83
Total		78,140	178	78,318	32	82	10	244	224	3,814	54	35	4,495

TABLE 11 B: HEALTH SERVICE AREA - BEHAVIORAL HEALTH SERVICES

COUN	TIES	FFS POPULATION BEHAVIORAL HEALTH PROVIDERS IN SERVICE AREA							REA				
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMER-ICANS	NON NATIVE AMERI-CANS	TOTAL	IHS & Tribal Facilities with BH services	FQHCS, RHC, HB-RHC with BH Services	Psych Hospitals or Units	BH Agencies, CMHCs, Core Service Agencies	BH Group Practices	BH INDIVIDUAL PRACTITIONERS	Schools	School Based Health Centers	TOTAL
Bernalillo		11,030	68	11,098	12	11	4	108	124	1945	8	13	2225
Catron	underserved	27		27	1	6	1	8	1	87	3	0	107
Chaves	underserved	61	3	64	0	3	0	9	8	95	4	5	124
Cibola	underserved	4,944	1	4,945	12	9	4	95	107	1768	7	10	2012
Colfax	underserved	30		30	0	3	0	1	2	25	2	3	36
Curry		47	1	48	0	2	0	9	5	92	2	1	111
De Baca	underserved	7		7	0	1	0	7	3	75	1	1	88
Dona Ana	partially	345	15	360	0	13	3	31	39	427	2	4	519
Eddy		85	12	97	0	5	1	10	1	101	5	0	123
Grant		51	1	52	0	4	1	8	1	96	2	0	112
Guadalupe	underserved	8		8	0	3	0	10	3	93	6	4	119
Harding	underserved			0	0	2	0	3	2	16	2	3	28
Hidalgo	underserved	3		3	0	4	1	8	1	96	2	0	112
Lea	underserved	57	7	64	0	5	1	10	1	101	5	0	123
Lincoln	underserved	242	3	245	0	1	0	9	7	74	2	5	98
Los Alamos		21		21	3	10	1	33	27	499	5	1	579
Luna		62	1	63	0	17	3	33	31	471	4	4	563
McKinley	underserved	25,221		25,221	10	6	0	4	3	82	4	0	109
Mora	underserved	15		15	0	5	0	7	1	83	5	3	104
Otero		2,062	2	2,064	1	4	2	11	13	157	3	1	192
Quay	underserved	18	1	19	0	0	0	3	2	15	2	2	24
Rio Arriba	partially	2,366	10	2,376	5	15	1	33	25	491	8	1	579
Roosevelt	underserved	55		55	0	1	0	8	5	87	2	0	103
Sandoval	partially	7,347	9	7,356	12	11	4	108	124	1945	8	13	2225
San Juan	underserved	19,940	8	19,948	2	1	0	9	10	149	4	0	175
San Miguel		145	3	148	2	10	1	35	25	511	7	2	593
Santa Fe	partially	1,480	25	1,505	13	18	5	131	144	2308	9	12	2640
Sierra	underserved	33		33	0	13	2	29	30	417	3	4	498
Socorro	underserved	1,016	3	1,019	3	5	4	96	101	1733	6	10	1958
Taos		663		663	3	14	1	36	33	543	7	2	639
Torrance	underserved	98		98	1	6	4	91	97	1681	5	11	1896
Union	underserved	3		3	0	1	0	1	2	23	1	2	30
Valencia	underserved	658	5	663	12	11	4	108	124	1945	8	13	2225
			17						1,10	18,23	14		
Total		78,140	8	78,318	92	220	48	1,102	2	1	4	130	21069

TABLE 12 A: COUNTY AREA ONLY - DENTAL SERVICES

COUN	NTIES	FFS	POPULAT	ION	DENTAL SERVICES					
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERI- CANS	NON NATIVE AMERI- CANS	TOTAL	IHS or TRIBAL FACILITIES with Dental Services	FQHCS, RHC, HB- RHC with Dental Services	GROUP PRACTICES and OTHER CLINICS	INDIVIDUAL PRACTTIONERS	TOTAL	
Bernalillo	partially	11,030	68	11,098	3	3	79	258	343	
Catron	underserved	27		27		1			1	
Chaves		61	3	64		1	5	17	23	
Cibola	underserved	4,944	1	4,945	4		2	13	19	
Colfax		30		30			1	3	4	
Curry		47	1	48		2	4	12	18	
De Baca	underserved	7		7		2		3	5	
Dona Ana	partially	345	15	360		9	15	57	81	
Eddy		85	12	97		1	3	26	30	
Grant		51	1	52		3		5	8	
Guadalupe	underserved	8		8			1		1	
Harding	underserved			0					0	
Hidalgo	underserved	3		3		2		5	7	
Lea	underserved	57	7	64			3	12	15	
Lincoln		242	3	245		2	1	3	6	
Los Alamos		21		21			2	1	3	
Luna	underserved	62	1	63		2	3	7	12	
McKinley		25,221		25,221	5		6	47	58	
Mora	underserved	15		15		2		2	4	
Otero	underserved	2,062	2	2,064	1	1		4	6	
Quay	underserved	18	1	19				2	2	
Rio Arriba	partially	2,366	10	2,376	2	3	2	16	23	
Roosevelt		55		55		2	2	6	10	
Sandoval		7,347	9	7,356	7	1	8	41	57	
San Juan		19,940	8	19,948	3	1	13	64	81	
San Miguel		145	3	148		3	3	7	13	
Santa Fe	partially	1,480	25	1,505	1	4	9	46	60	
Sierra	underserved	33		33		2		3	5	
Socorro	underserved	1,016	3	1,019	1			2	3	
Taos		663		663	1	1	2	12	16	
Torrance	underserved	98		98		2		2	4	
Union	underserved	3		3					0	
Valencia		658	5	663		1	6	48	55	
Total		78,140	178	78,318	28	51	170	724	973	

TABLE 12 B: HEALTHSERVICE AREA - DENTAL SERVICES

COUN	ITIES	FFS I	POPULA	TION	DENTAL SERVICES							
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERI- CANS	NON NATIVE AMERI- CANS	TOTAL	IHS or TRIBAL FACILITIES with Dental Services	FQHCS, RHC, HB- RHC with Dental Services	GROUP PRACTICES and OTHER CLINICS	INDIVIDUAL PRACTTIONERS	TOTAL			
Bernalillo	partially	11,030	68	11,098	10	5	93	347	455			
Catron	underserved	27		27	1	4	0	7	12			
Chaves		61	3	64	0	2	6	21	29			
Cibola	underserved	4,944	1	4,945	12	3	87	318	420			
Colfax		30		30	0	2	1	5	8			
Curry		47	1	48	0	6	6	21	33			
De Baca	underserved	7		7	0	4	4	15	23			
Dona Ana	partially	345	15	360	0	9	38	141	188			
Eddy		85	12	97	0	1	6	38	45			
Grant		51	1	52	0	7	3	17	27			
Guadalupe	underserved	8		8	0	3	4	9	16			
Harding	underserved			0	0	2	0	4	6			
Hidalgo	underserved	3		3	0	7	3	17	27			
Lea	underserved	57	7	64	0	1	6	38	45			
Lincoln		242	3	245	0	3	7	19	29			
Los Alamos		21		21	2	5	12	51	70			
Luna	underserved	62	1	63	0	16	18	74	108			
McKinley		25,221		25,221	9	0	8	60	77			
Mora	underserved	15		15	0	5	3	9	17			
Otero	underserved	2,062	2	2,064	1	1	24	89	115			
Quay	underserved	18	1	19	0	0	1	2	3			
Rio Arriba	partially	2,366	10	2,376	3	7	11	62	83			
Roosevelt		55		55	0	4	6	18	28			
Sandoval		7,347	9	7,356	10	5	93	347	455			
San Juan		19,940	8	19,948	3	1	14	69	87			
San Miguel		145	3	148	1	7	12	53	73			
Santa Fe	partially	1,480	25	1,505	11	8	96	345	460			
Sierra	underserved	33		33	0	11	15	60	86			
Socorro	underserved	1,016	3	1,019	2	4	84	303	393			
Taos		663		663	2	5	11	58	76			
Torrance	underserved	98		98	1	5	79	255	340			
Union	underserved	3		3	0	0	1	3	4			
Valencia		658	5	663	10	5	93	347	455			
Total		78,140	178	78,318	78	148	845	3,222	4293			

TABLE 13 A: COUNTY AREA ONLY - HOME HEALTH

cou	INTIES	FFS	POPULATI	ON	HOME HEALTH
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERICANS	TOTAL	AGENCIES
Bernalillo	not established	11,030	68	11,098	9
Catron	not established	27		27	
Chaves	not established	61	3	64	5
Cibola	not established	4,944	1	4,945	
Colfax	not established	30		30	
Curry	not established	47	1	48	3
De Baca	not established	7		7	
Dona Ana	not established	345	15	360	11
Eddy	not established	85	12	97	6
Grant	not established	51	1	52	2
Guadalupe	not established	8		8	
Harding	not established			0	
Hidalgo	not established	3		3	
Lea	not established	57	7	64	3
Lincoln	not established	242	3	245	1
Los Alamos	not established	21		21	1
Luna	not established	62	1	63	1
McKinley	not established	25,221		25,221	2
Mora	not established	15		15	2
Otero	not established	2,062	2	2,064	2
Quay	not established	18	1	19	1
Rio Arriba	not established	2,366	10	2,376	1
Roosevelt	not established	55		55	1
Sandoval	not established	7,347	9	7,356	
San Juan	not established	19,940	8	19,948	5
San Miguel	not established	145	3	148	2
Santa Fe	not established	1,480	25	1,505	1
Sierra	not established	33		33	1
Socorro	not established	1,016	3	1,019	1
Taos	not established	663		663	1
Torrance	not established	98		98	
Union	not established	3		3	1
Valencia	not established	658	5	663	1
Total		78,140	178	78,318	64

TABLE 13 B: HEALTHSERVICE AREA - HOME HEALTH

COUNTIES		FFS POPULATION			HOME HEALTH
RECIPIENT RESIDENCE AREA	HRSA DESIGNATION	NATIVE AMERICANS	NON NATIVE AMERICANS	TOTAL	AGENCIES
Bernalillo	not established	11,030	68	11,098	10
Catron	not established	27		27	3
Chaves	not established	61	3	64	7
Cibola	not established	4,944	1	4,945	11
Colfax	not established	30		30	2
Curry	not established	47	1	48	4
De Baca	not established	7		7	3
Dona Ana	not established	345	15	360	11
Eddy	not established	85	12	97	9
Grant	not established	51	1	52	3
Guadalupe	not established	8		8	3
Harding	not established			0	4
Hidalgo	not established	3		3	3
Lea	not established	57	7	64	9
Lincoln	not established	242	3	245	6
Los Alamos	not established	21		21	3
Luna	not established	62	1	63	14
McKinley	not established	25,221		25,221	2
Mora	not established	15		15	4
Otero	not established	2,062	2	2,064	3
Quay	not established	18	1	19	1
Rio Arriba	not established	2,366	10	2,376	2
Roosevelt	not established	55		55	4
Sandoval	not established	7,347	9	7,356	10
San Juan	not established	19,940	8	19,948	5
San Miguel	not established	145	3	148	3
Santa Fe	not established	1,480	25	1,505	10
Sierra	not established	33		33	12
Socorro	not established	1,016	3	1,019	11
Taos	not established	663		663	2
Torrance	not established	98		98	9
Union	not established	3		3	1
Valencia	not established	658	5	663	10
Total		78,140	178	78,318	194

Summary

This Access Monitoring Review Plan analyzed access to providers of healthcare services in 2015 for New Mexico Medicaid FFS recipients.

The Medicaid provider rates for practitioners were compared with the Medicare rates applicable to New Mexico for essentially the same time period.

HSD/MAD analyzed access issues that have been reported to the Medicaid program by recipients who may be seeking assistance in locating providers.

HSD/MAD analyzed the number of providers in six distinct healthcare service categories in relation to the number of recipients in their geographical health care service areas.

The analysis indicates nearly all (99.9%) Medicaid FFS recipients are Native Americans who have not opted-in to the Centennial Care program. This population is split nearly in half by adults (52% age 18 and over) and children (42% age 17 and under).

HSD/MAD reviewed the Merritt Hawkins report "A Review of Physician-to-Population Ratios" (http://www.merritthawkins.com/pdf/a-review-of-physician-to-population-ratios.pdf) which reports the number of physicians required per 100,000 population from four different sources:

- Graduate Medical Education National Advisory Committee
- David Goodman, MD., JAMA
- Hicks & Glenn, Journal of Health Care Management
- Solucient (now Thompson Healthcare)

MAD also reviewed the CMS guidelines and standards in miles and driving time for accessing providers within Medicaid managed care programs. MAD also compared the numbers of providers in managed care organization networks (which is the closest measure to a commercial network that is available, with those providers available in the Medicaid fee-for-service program.

Under all these standards and with these comparisons it appears that the New Mexico Medicaid program fee-for-service population has adequate access to the medical services when considering services available in neighboring counties making up the Healthcare Service Areas and the presence and location of IHS and other Tribal Healthcare Facilities, and the access is comparable to other populations. This is largely due to the presence of IHS and Tribal Healthcare Facilities in critical areas to meet the needs of the Native American population. HSD/MAD will work with IHS and Tribal Leaders to obtain a more detailed

understanding from the experience of Native American recipients, Indian Health Services, and other Tribal Healthcare providers regarding perceptions about access (or lack of) to providers, to specific services, and for referrals.

Further analyses of access to medical and healthcare services for the NM FFS population indicate the following:

Access to Medical Services:

- 98.1% of the FFS population resides within the 11 counties that have at one or more IHS or tribal healthcare facilities and one or more FQHCs. When looking at the wider Healthcare Service Area, access to Medicaid healthcare providers is significantly enhanced.
- 20 counties do not have IHS or tribal healthcare facilities within the county area. However, these counties do have one or more FQHCs. 1.7% of the FFS population resides within these 18 counties. Again, when looking at the wider Healthcare Service Area, access to Medicaid healthcare providers is increased.
- The remaining 2 counties that have neither IHS or tribal health care facilities nor an FQHC are Union County with 3 Medicaid FFS recipients and Los Alamos County with 21 FFS recipients. Union County is served by a hospital with outpatient care services. Los Alamos County is not an underserved county so recipients have access to other providers.
- When looking at the wider Healthcare Service Area, there is no county in New Mexico that does not have at least one FQHC and/or one IHS or tribal health care facility.

Access to Behavioral Health Services:

- The study related to behavioral health only included IHS and tribal facilities as well as FQHCs if these providers bill for behavioral health services. This distinction was made because not all IHS, tribal facilities, and FQHCs provide behavioral health services.
- There is one county in New Mexico, Harding county, that has no behavioral health providers of any kind. However, no FFS recipients reside in that county.

Access to Dental Services:

• There are 3 counties in New Mexico that do not have dental services available from either an IHS or tribal facility, an FQHC, or a dental practice or individual dentist. The FFS population in these counties is just 22 recipients. When the wider dental Healthcare Services Area is considered, that is, access in a nearby county, there is no county in New Mexico that does not have least one FQHC and/or one IHS or tribal health care facility or dental practice or individual dentist.

Access to Home Health Services:

- There are 9 counties in New Mexico without a Home Health Agency. Most of the home health services in New Mexico are delivered to the older population which is enrolled in Medicare and;, therefore, enrolled in managed care rather than in the Medicaid FFS program. Use of Home Health Agency services in the fee for service program is very light even in areas where home health services are readily available, due to the nature of the fee for service population.
- There are 12,474 FFS recipients in these counties. 7,356 recipients are in Sandoval County which is in the urban corridor area, with the largest population essentially being a suburb of the Albuquerque area.
- When the wider Healthcare Service Area is considered, there is no county in New Mexico that does not have at least one Home Health Agency available to recipients residing in that county. There are, however, potential areas in New Mexico that are in more isolated parts of some counties for which it would be difficult to obtain home health services because of the isolated locations. However, this would be a comparable issue for all populations living in those isolated areas, not just the Medicaid fee for service recipients.

As stated earlier, most fee for service recipients, even in counties with low populations that are rural in nature, tend to live in or close to the population center of the county even when a town is small. When healthcare providers are available in those small population centers, they tend to see Medicaid recipients and non-Medicaid recipients alike as it is difficult to operate a healthcare practice or business of any kind in those areas without including the Medicaid population. In such areas, it is the small number of practitioners in these areas -- rather than comparability, i.e. an unwillingness of a provider to serve Medicaid recipients -- that may be an issue. The IHS facilities, other tribal healthcare facilities, FQHCs, rural health clinics, and hospital based rural health clinics are essential in assuring access to healthcare services in New Mexico.

Lastly, one program that shows promise in providing better access to healthcare for rural recipients is *telehealth*. In 2015, telehealth services were utilized for the Medicaid FFS recipients in Bernalillo, Cibola, Dona Ana, McKinley, Otero, and Sandoval counties. Four Indian Health Service or tribal healthcare facilities utilized telehealth services as well. The most common use of telehealth services was for behavioral health. Expanding telehealth services across the state will most certainly strengthen the FFS recipients' access to services.

Given that Native Americans are the primary users of the Medicaid FFS program, New Mexico's access goals for Medicaid FFS are to:

- 1. Ensure that Non-IHS/Non-Tribal providers are sufficient to accommodate referrals from IHS and Tribal Facilities.
- 2. Continue to develop the state wide network that makes services by telemedicine readily available to IHS and Tribal Facility settings.
- 3. Ensure that there are dental services and behavioral health services available by encouraging IHS and Tribal Facilities to develop those services and by working to develop those services in Non-IHS/Non-Tribal Facility settings.
- 4. Continue to collaborate with our tribal partners and IHS on finding solutions to workforce shortages and other access issues, including the development of telehealth capabilities.

Notes on Public Comments

To facilitate public comment, suggestions, and recommendations, the proposed format and content of the Access Monitoring Review Plan for calendar year 2015 and the federal requirement as stated in 42 CFR § 447.203 may be found on the Department's website at:

http://www.hsd.state.nm.us/public-notices-proposed-rule-and-waiver-changes-and-opportunities-to-comment.aspx.

Public comments will be received through September 26, 2016.

If you do not have internet access, a written copy of the proposed information in this supplement and on the HSD website may be requested by contacting MAD in Santa Fe at 505-827-6252.

Recorded comments may be left by calling (505) 827-1337. Electronic comments may be submitted to madrules@state.nm.us. Written, electronic and recorded comments will be given the same consideration as oral testimony. All comments must be received no later than 5:00 p.m. MDT, September 26, 2016.

Written or e-mailed comments are preferred because they become part of the record associated with these changes.

Interested persons may address written comments to:

Human Services Department
Office of the Secretary
ATTN: Medical Assistance Division Public Comments
P.O. Box 2348
Santa Fe, New Mexico 87504-2348

If you are a person with a disability and you require this information in an alternative format or require a special accommodation to participate in the public hearing, please contact the MAD in Santa Fe at 505-827-6252. The Department's TDD system may be accessed toll-free at 1-800-659-8331 or in Santa Fe by calling 505-827-3184. The Department requests at least 10 working days advance notice to provide requested alternative formats and special accommodations.

Copies of all comments will be made available by MAD upon request by providing copies directly to a requestor or by making them available on the MAD website or at a location within the county of the requestor.