

From: [Linda Siegle](#)
To: [Burmeister, Christopher, DOH](#)
Subject: [EXT] RE: Rules hearing September 17th
Date: Wednesday, September 16, 2020 10:28:11 AM
Attachments: [Home Health Rule CHANGES.docx](#)

Good morning Mr. Burmeis
Please find public comments from the New Mexico Nurse Practitioner Council.
Thanks

Linda

Linda Siegle
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The lips of wisdom are closed, except to the ears of understanding. The Kybalion

September 15, 2020

To: Hearing Officer for September 17, 2020 Public Hearing on
Home Health Services/ Requirements for Home Health Agencies

From: Linda Siegle, New Mexico Nurse Practitioner Council

Thank you for the opportunity to comment on the proposed rule change for 7.28.2.33 Plan of Care Subsection A Paragraph (2) and (3). We support these changes in order for New Mexico to comply with new federal law and rules changes. It appears, however, that there are several other changes necessary so that there will be no confusion for the home health agencies.

I have suggested adding definitions for nurse practitioners and clinical nurse specialists since a definition of physician is included in the rule. Perhaps, too, physician assistant should be defined.

I have also included two additional areas where all providers should be listed in order to make the entire rule consistent.

Additional changes to Title 7 Chapter 28 Part 2

Proposed Changes in RED

7.28.2.7 Definitions

C. Add definition - **Clinical Nurse Specialist is a registered nurse who is licensed by the board for advance practice as a clinical nurse specialist and whose name and pertinent information are entered on the list of clinical nurse specialists maintained by the board.** Nursing Practice Act – 61-61.3.3 G)

M. Medically directed services means in-home services that are provided in accordance with a patient/client's plan or level of care which is reviewed and approved by a physician, **physician assistant or nurse practitioner or clinical nurse specialist** at least annually.

N. Add a definition **Nurse - Practitioner is a registered nurse who is licensed by the Board of Nursing for advance practice as a certified nurse practitioner and whose name and pertinent information are entered on the list of certified nurse practitioner maintained by the board.** (Nursing Practice Act – 61.3.3 E)

7.28.2.34 Patient/Client Records

A. (d) name of physician, **physician assistant, nurse practitioner or clinical nurse specialist;**