

Armijo, Alicia, HED

From: Clayton C Richards <CcRichards@salud.unm.edu>
Sent: Friday, May 22, 2026 1:09 PM
To: Info, HigherEd, HED
Cc: Richards, M
Subject: [EXTERNAL] 5.7.3.13 NMAC, INELIGIBLE DEBTS - Comment from UNM Health Sciences Center
Attachments: NMAC 5.7.3_UNMHSC Comment.pdf

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Hello,

Thank you for the opportunity to comment on the proposed repeal and replacement of 5.7.3 NMAC, NEW MEXICO HEALTH PROFESSIONAL LOAN REPAYMENT PROGRAM (HPLRP).

On behalf of UNM HSC Executive Vice President, Dr. Michael Richards, attached are UNM HSC's comments on the proposed rulemaking. Please reach out with any questions.

Thank you,

Clay

Clayton Richards

Deputy Chief of Staff
Office of the Executive Vice President
UNM Health Sciences Center & Health System

Mobile: 505.645.2015



Office of the Executive Vice President for Health Sciences
University of New Mexico Health Sciences Center
2500 Marble Ave NE
Albuquerque, NM 87131

May 22, 2026

New Mexico Higher Education Department
2044 Galisteo Street, Suite 4
Santa Fe, NM 87505

RE: University of New Mexico Health Sciences Center Comment on Proposed Rulemaking – 5.7.3 NMAC

Honorable Secretary Rodriguez:

On behalf of The UNM Health Sciences Center, I write in support of the proposed repeal and replacement of 5.7.3 NMAC. This program advances our shared mission to build the State of New Mexico's healthcare workforce, and we are committed to supporting its implementation and success. We appreciate the opportunity to provide comments toward that end. We offer the following comment for consideration:

5.7.3.13 NMAC, INELIGIBLE DEBTS

To prevent undermining other service incentive programs, we recommend inclusion of penalties and reverted principal from breaches in other programs' service requirements – such as those administered by the Department, Indian Health Service, or National Health Service Corps – within the rule's provisions for *Ineligible Debts*. Once breached, these incentives often convert to conventional loans, which might otherwise be eligible under the current 5.7.3.13 NMAC language. Left alone, the rule could incentivize breach of existing service agreements in cases where this program's terms are more favorable.

UNM HSC appreciates the Department's consideration of this comment. We welcome further discussion and stand ready to provide additional information as needed.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Richards'.

Michael E. Richards, MD, MPA
Executive Vice President, UNM Health Sciences
CEO, UNM Health System