

<b>LFC Requester:</b>	<b>Harry (Harrison) Rommel</b>
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## AGENCY BILL ANALYSIS - 2026 REGULAR SESSION

### SECTION I: GENERAL INFORMATION

*{Indicate if analysis is on an original bill, amendment, substitute or a correction of a previous bill}*

**Date Prepared:** 01/20/2025

*Check all that apply:*

**Bill Number:** SB 1

Original  Correction   
 Amendment  Substitute

**Sponsor:** Sens. Linda M. Trujillo (D),  
 Katy M. Duhigg (D), and  
 Nicole Tobiassen (R), and  
 Reps. Pamela Herndon (D)  
 and Marian Matthews (D)

**Agency Name and Code Number:** 305 – New Mexico  
 Department of Justice

**Person Writing Analysis:** Hope A. Bauman

**Short Title:** Interstate Medical Licensure  
 Compact

**Phone:** 505-645-5980

**Email:** Fir.request@nm DOJ.gov

### SECTION II: FISCAL IMPACT

#### APPROPRIATION (dollars in thousands)

Appropriation		Recurring or Nonrecurring	Fund Affected
FY26	FY27		

(Parenthesis ( ) indicate expenditure decreases)

#### REVENUE (dollars in thousands)

Estimated Revenue			Recurring or Nonrecurring	Fund Affected
FY26	FY27	FY28		

(Parenthesis ( ) indicate revenue decreases)

#### ESTIMATED ADDITIONAL OPERATING BUDGET IMPACT (dollars in thousands)

	FY26	FY27	FY28	3 Year Total Cost	Recurring or Nonrecurring	Fund Affected
<b>Total</b>						

Duplicates/Conflicts with/Companion to/Relates to:  
Duplicates/Relates to Appropriation in the General Appropriation Act

### **SECTION III: NARRATIVE**

*This analysis is neither a formal Opinion nor an Advisory Letter issued by the New Mexico Department of Justice. This is a staff analysis in response to a committee or legislator's request. The analysis does not represent any official policy or legal position of the NM Department of Justice.*

### **BILL SUMMARY**

Synopsis: Senate Bill 1 (“SB 1” or “Act”) proposes to enact the Interstate Medical Licensure Compact (“IMLC”) into New Mexico law, thereby creating an expedited pathway for qualified physicians to obtain full medical licenses in multi-member states while preserving New Mexico’s regulatory authority over medical practice and discipline. The IMLC primarily aims to expedite the licensing process between member states to allow physicians to more easily practice across state lines while still subjecting physicians to the authority of each member state’s practice act and medical board. Specifically, SB 1 § 2 would adopt the text from the “base” IMLC, which is comprised of twenty-four (24) sections or articles that define the eligibility criteria, application processes, coordinated information systems, disciplinary reciprocity, interstate governance via the Interstate Medical Licensure Compact Commission (“IMLCC”), default and dispute resolution mechanism, and the preservation of member state’s authority and sovereignty. *See*, IMLC §§ 1–24 (Oct. 27, 2015).

SB 1 also updates the New Mexico Medical Practice Act (“NMMPA”) by implementing New Mexico’s participation as a member state in the IMLC and by adding state-specific provisions designed to govern the implementation and oversight of the IMLC. *See*, NMSA 1978, 61-6-1, *et seq.* (eff. June 18, 2021).

In short, SB 1 proposes to:

1. adopt the IMLC into New Mexico state law and authorize New Mexico to join other member states in the IMLC multistate licensure framework (SB 1 § 2);
2. prohibit New Mexico employers from making participation in the IMLC, or licensure through the IMLC, a condition of employment for physicians (SB 1 § 3);
3. establish a process and procedure for appointing the New Mexico IMLC commissioners and outlines said commissioners’ duties (SB 1 § 4);
4. require publication of IMLC bylaws, rules, notices, minutes, and other related documents on the New Mexico Medical Board’s website (SB 1 § 5);
5. conduct joint investigations with other IMLC member states’ medical boards while limiting investigative subpoenas that may conflict with the New Mexico Reproductive and Gender-Affirming Health Care Protection Act (SB 1 § 6; *see also*, NMSA 1978, § 24-35-1, *et seq.* (eff. June 16, 2023)); and
6. provide for a contingent repeal of the IMLC enactment that will automatically trigger

New Mexico's immediate withdrawal from the IMLC if, upon judicial review, a rule or decision of the Interstate Licensure Compact Commission ("IMLCC" or "Commission") alters the scope of practice or definition of unprofessional conduct to conflict with or be inconsistent with New Mexico law (SB 1 § 7).

Section 1 proposes the short title of the Act be cited as the "Interstate Medical Licensure Compact".

Section 2 proposes that New Mexico adopt the full text (Articles 1–24) of the IMLC into state law and enter the IMLC with other member states and jurisdictions. This establishes a new, statutory licensure mechanism meant to operate alongside the New Mexico Medical Practice Act ("NMMPA"). See, NMSA 1978, 61-6-1, et seq. (eff. June 18, 2021).

Section 2, Article 1 defines various terms.

Section 2, Article 2 states the proposed eligibility requirements for a physician to receive an expedited license under the terms and provisions of that compact state (i.e., New Mexico).

Section 2, Article 3 states that a physician "shall" designate a compact member state as their state of principal license and may redesignate its state of principal license at any time. A physician may designate a particular member state as their state of principal license if the state is: (i) the physician's principal residence; (ii) where at least twenty-five (25) percent of the physician's practice of medicine occurs; (iii) the location of the physician's employer; or (iv) the state designated as state residence for the purpose of federal income tax" if a state does not otherwise qualify under the three provisions. Subsection B clarifies that a physician may "redesignate a member state as the state of principal licensure at any time" so long as the state meets the four listed requirements in Subsection A. Finally, Section 2, Article 3, Subsection C grants the IMLCC the authority to "develop rules to facilitate redesignation of another member state as the state of principal license."

Section 2, Article 4 states the requirements for a physician to seek licensure through the IMLCC and issuance of expedited licensure. Subsection A requires a physician to file an application with the member board they wish to select as their state of principal license. Subsection B requires the member board within the principal state of licensure to evaluate the application for eligibility by, among other things, conducting a criminal background check. Subsection C states, upon verification pursuant to Subsection B, eligible physicians for an expedited licensure shall complete the registration process established by the IMLCC, including the payment of applicable fees. After compliance with Subsections B and C, Subsection D requires a member board to issue an expedited license to the physician to practice medicine in the issued state consistent with all applicable laws, which shall be valid for a period consistent with the licensure period in the member state, pursuant to Subsection E. Subsection F states that the expedited license will be terminated if the physician fails to maintain the license in the state of principal licensure for a non-disciplinary reason. Subsection G states the IMLCC has authority to develop rules for the application process.

Section 2, Article 5 proposes that the member state issuing the expedited license may be allowed to impose a fee for issuance or renewal through the IMLC. Article 5 also grants the IMLCC authority to develop rules regarding fees for expedited licenses.

Section 2, Article 6 proposes requirements for renewal of a physician's expedited license under the IMLC. Subsection A states the renewal process shall be completed with the Commission and lists the requirements for renewal, which includes complying with all continuing professional development or education requirements for renewal outlined under Subsection B. Subsection C empowers the IMLCC to collect and distribute renewal fees to the applicable member board, and Subsection D requires that upon renewal fees, the member board shall renew a physician's license. Subsection E states that physician information collected in the renewal process will be distributed to all member states. Subsection F states the IMLCC may develop rules for the renewal process under the IMLC.

Section 2, Article 7 mandates that the IMLCC establish a database of all licensed physicians and physicians who have applied for licensure pursuant to IMLC Article 4. Subsection B states that member boards shall report to the Commission any public action or complaint against a licensed physician who has either applied for or received an expedited license. Subsection C states that member boards shall report disciplinary or investigatory information determined by the Commission, and Subsection D allows member board to report information not required by Subsection C to the Commission. Subsections E and F state that all member boards shall share complaint or disciplinary information about a physician on request by another member board, and all information shared to the Commission or other member boards shall be confidential. Subsection G states the Commission is authorized to develop rules for the sharing of information processes.

Section 2, Article 8 proposes joint investigations for a physician's licensure and disciplinary records amongst member states. Subsection B grants the authority for joint investigations, and Subsection C provides that if New Mexico participates in a joint investigation as a member state and another member board requests an investigative subpoena, the New Mexico Medical Board must issue an investigative subpoena. Subsection D states that member boards may share investigative, litigation, or compliance matters for joint or individual investigations initiated under the IMLC. Subsection E states a member state can investigate actual or alleged violations of statutes in any other member state in which a physician holds a license.

Section 2, Article 9 proposes the disciplinary action for physicians licensed through the IMLC. Subsection A states that disciplinary action taken by a member board against a physician license through the IMLC may be subject to discipline by other member boards. Subsection B states that if a license that is granted in the state of principal license is revoked, surrendered, or suspended, then all licenses issued by member boards shall be placed on the same status. If the license is reinstated, it shall be reinstated until the respective member board takes action to reinstate. Subsection C states that if disciplinary action is taken against a physician by a member board not in the state of principal license, any other

member board may impose the same or lesser sanctions or pursue separate disciplinary action. Subsection D states that if a physician's license is revoked, surrendered, or relinquished in lieu of discipline, then any licenses issued by other members boards shall be suspended for ninety days upon entry of the order by the disciplining board to permit the member board to investigate for action. Subsection E states that a license that is automatically suspended or revoked shall be reinstated if the suspension or revocation is solely because the physician performed, recommended, or provided reproductive health services or gender-affirming care.

Section 2, Article 10 creates and empowers the Commission as a body corporate and joint agency of the member states under New Mexico law. Subsection D states that the Commission will consist of two voting representatives appointed by each member state, who will serve as commissioners and set the requirements for commissioners. The Commission will also meet at least once a year where each commissioner is entitled to one vote, and a majority vote by the commissioners is a quorum. The Commission shall provide public notice of all meetings, the meetings should be open to the public, the Commission shall keep meeting minutes, and records are subject to public inspection. Subsections K and L also state that the Commission must establish an executive committee that oversees the IMLC and other committees for administration.

Section 2, Article 11 establishes the IMLCC's duties and powers to: oversee and maintain the administration of the IMLC; promulgate rules and establish and appoint committees; issue advisory opinions concerning the interpretation of the IMLC; enforce compliance with the IMLC, including the use of the judicial process; pay expenses, purchase and maintain bonds, accept donations and grants of money; lease or purchase property and sell property; establish a budget, maintain records, coordinate education and training regarding the IMLC; seek and obtain trademarks, copyrights, and patents; and report annually to the member states' legislature and governor, which shall include financial audits and perform functions as may be necessary to achieve the purpose of the IMLC.

Section 2, Article 12 sets forth the proposed finance powers of the IMLCC. Subsection A allows the Commission to collect an annual assessment from each member state. Subsections B and C state that the Commission is not obligated to secure the funds or pledge credit. Subsection D further states that the Commission shall be subject to a yearly audit.

Section 2, Article 13 proposes the organization and operation of the IMLCC. Article 13 states that the Commission shall adopt bylaws and appoint a chair, vice chair, and treasurer annually. Subsections D and E offer the scope of the officers and employees' immunity, representation, and liability. Subsection E also requires the Commission to defend the executive director and its employees, subject to the approval of the attorney general or other legal counsel of the member state represented by an interstate commission representative. Finally, Subsection F provides that the liability of the IMLCC within New Mexico (i.e., a member state) cannot exceed the liability limits under the New Mexico Constitution and New Mexico statutory laws for state officials, employees, and agents because the IMLCC will be "an instrumentality" of New Mexico for the purposes of any such

action.

Section 2, Article 14 outlines the IMLCC's rulemaking functions, including that a person may file a petition for judicial review no later than thirty (30) days after promulgation of a rule under the IMLC.

Section 2, Article 15 grants the IMLCC oversight authority over member states. Subsection A states that the executive, legislative, and judicial branches of state government in each member state shall enforce the IMLC, but the provisions of the compact, along with promulgated rules, shall be treated as statutory law but shall not supersede the member state's existing authority to regulate the practice of medicine. Subsection B states that courts shall take judicial notice of the IMLC and promulgated rules if any judicial or administrative proceeding in a member state may affect the powers of the IMLCC. Subsection C states that the IMLCC is entitled to standing.

Section 2, Article 16 grants the IMLCC jurisdiction to enforce the IMLC provisions. Subsections B and C state that by a majority vote, the IMLCC may initiate legal action to enforce compliance and can avail itself of any other remedies under state law or regulation of a profession.

Section 2, Article 17 establishes the default procedures for when a member state fails to perform obligations imposed by the IMLC or the rules promulgated by the IMLCC. Subsection B provides the default procedure, which includes written notice of curing and conditions and provides remedial training and technical assistance. Subsections C, E, F, and G state that failure to cure will result in the termination of the IMLC by a majority vote of the commissioners, and proposes termination notice and responsibilities relating to cost. Subsection H prevents the IMLCC from issuing a fine or penalty to a state in default unless authorized by a court order. Subsection I outlines the appellate procedures for a defaulting state.

Section 2, Article 18 provides that the IMLCC "shall attempt, upon the request of a member state," to resolve disputes subject to the IMLC, including any conflicts arising amongst member states and boards. It also entrusts the IMLCC to promulgate mediation and other binding dispute resolutions "as appropriate."

Section 2, Article 19 establishes that any state may become a member of the IMLC and that the IMLC will go into effect upon enactment. The IMLCC may propose amendments to the IMLC, but the amendments shall not become effective until unanimous consent of the member states enact them into law.

Section 2, Article 20 proposes that, once effective, the IMLC shall be binding on a member state, provided that the member state may withdraw. Subsections B, C, D, E, and F establish the procedure of withdrawal, including enactment of a statute repealing the IMLC, notification to the IMLCC and other member states, repealing responsibilities, and reinstatement. Subsection G states that the Commission is authorized to develop rules to address the impact of withdrawal.

Section 2, Article 22 includes the severability of the IMLC and that the provisions of the IMLC is liberally construed but "shall" not be construed to "prohibit the applicability of other interstate compacts to which the member states are

members.”

Section 2, Article 23 outlines the binding effect of the IMLC on New Mexico law. Subsection A states that nothing in the IMLC prevents the enforcement of another law of a member state that is not inconsistent. Subsection B states that member states’ laws in conflict with the IMLC are superseded to the extent of the conflict. Subsections C and D establish that all lawful actions, rules, and bylaws of the IMLCC, including all agreements between the IMLCC and member states, are “binding” upon all member states “in accordance with their terms.”

Section 2, Article 24 outlines which New Mexico laws the IMLC preserves. Subsection A states that nothing in the IMLC “changes or limits” the effect of an applicable Medical Practice Act of a member state. Subsection B establishes the “prevailing standard for licensure” and affirms the jurisdiction of the state medical board in the state in which the patient is located at the time of treatment. Subsection C retains the New Mexico Medical Board’s authority to impose disciplinary action against physicians who are licensed to practice medicine in New Mexico, “including licenses issued to physicians through procedures provided by [the IMLC].”

Section 3 is an employment protection provision that is not included in the text of the IMLC. The proposed provision prohibits employers from requiring that New Mexico-licensed physicians obtain licensure through the IMLC as a condition of employment. However, employers may still require that a physician obtains multistate licensure, but those physicians may choose any lawful licensing pathway.

Section 4 Subsection A authorizes the governor to appoint two physicians, who are licensed by the New Mexico Medical Board, to serve as commissioners to the IMLC. One of the two physician commissioners must be a medical doctor (“MD”), while the other must be an osteopathic physician (“DO”). The appointed commissioners serve at the pleasure of the governor, or until they are no longer a member of the New Mexico Medical Board. If a commissioner position is vacated, the governor shall appoint a medical board member who meets the qualifications of the vacating member. Section 4 Subsection B authorizes the governor to appoint an “alternative commissioner” for specific IMLCC meetings if the appointed physician meets all the same qualifications required under the IMLC. Finally, Section 4 Subsection C requires commissioners to ensure legal certification for closed meetings and to vote to document detailed reasoning and references in the IMLCC meeting minutes.

Section 5 requires the New Mexico Medical Board to post current IMLCC bylaws and rules, provide notice of any IMLCC actions impacting New Mexico physician licenses within thirty (30) days, release and document IMLCC meeting minutes, and ensure that any closed-meeting materials remain sealed unless released by a IMLCC vote or court order.

Section 6 adds a new section to the NMMPA that allows the New Mexico Medical Board to conduct joint investigations with other member states, but only pursuant to written agreements between the New Mexico Medical Board and other participating member medical boards. However, Section 6 further clarifies that any investigative subpoenas that conflict with the New Mexico Reproductive and Gender-Affirming Health Care

Protection Act are prohibited. *See*, NMSA 1978, § 24-35-1, et seq. (shielding New Mexico abortion and gender-affirming care providers from civil or criminal liability and discrimination by state licensing boards or by other states that lack these protections).

Section 7 is a safeguard provision that automatically repeals the IMLC in New Mexico if a court finds that either an IMLCC rule, decision, or related court order improperly alters a physician's practice scope, or conflicts with New Mexico's legal definition of unprofessional conduct.

## **FISCAL IMPLICATIONS**

Under SB 1 the Attorney General may be asked to review actions of the IMLCC or court rulings related to enforcement of the IMLC. This creates a new statutory duty for NMDOJ to provide legal analysis, which will require additional staff, time, and resources.

## **SIGNIFICANT ISSUES**

The IMLC standardizes an expedited pathway for licensure in multiple member states for physicians who meet certain eligibility criteria. If enacted, SB 1 will create a new pathway for medical licensure without changing or superseding the New Mexico Medical Practice Act or any other applicable state laws.

### New Mexico Law

However, New Mexico already has a physician expedited licensure framework under the Uniform Licensing Act. *See* NMSA 1978, § 61613 (2023). Section 61-6-1(A) states that upon receipt of a completed application, fees, and verification of licensure where the applicant actively holds a license to practice medicine, the New Mexico Medical Board may issue an expedited license as soon as practicable but no later than thirty (30) days. Therefore, assuming SB 1 is enacted, the expedited framework under Section 6161(A) may be interpreted to only apply to physicians who do not hold a principal license in a compact member state, or physicians who do not utilize the IMLC pathway for licensure in New Mexico. As such, it is unclear not only how Section 61-6-1 and SB 1 will interact, but also how they will be interpreted.

Since the Commission promulgates rules that bind the New Mexico Medical Board, and the governor is statutorily required to appoint two members of the New Mexico Medical Board to participate in the Commission, adopting the IMLC may implicate the Open Meetings Act ("OMA"). *See* NMSA 1978, §§ 10-15-1, et seq. Although Article 10 of Section 2 of SB 1 establishes that all Commission meetings will be open to public and properly noticed, it may be beneficial to assess whether the Commission's processes align with all OMA requirements. *See*, SB 1 § 2, Art. 10(H)–(J).

SB 1 also does not include an effective date. If signed into law, the legislation would go into effect ninety (90) days after the New Mexico Legislature adjourns the 2026 session. However, according to Article 19 of Section 2, Article 20, the IMLC will go into effect and be binding upon legislative enactment. *See*, SB 1 § 2, Art. 19(A)–(B). Consider amending the language to include a clause that matches New Mexico legislative procedure.

## Federal Law

Although the language in SB 1 expressly provides that any IMLC provision that conflicts with the New Mexico Reproductive and Gender-Affirming Health Care Protection Act will be superseded, a conflict may still arise. *See*, SB 1 § 6; *see also*, NMSA 1978, § 24-35-1, *et seq.* (eff. June 16, 2023). Precedent from outside jurisdictions exists that addresses the issue of whether interstate compact clauses supersede conflicting state statutes. Precedent states that by joining a particular interstate compact, that state's legislature intended to give up their sovereignty to the compact, especially where the compact does not expressly specify that the state statute controls when a conflict with the compact clauses arises between states. *See*, SB 1 § 6; *see also*, NMSA 1978, § 24-35-1, *et seq.* (eff. June 16, 2023); *see, e.g., Rosario v. Port Authority of New York and New Jersey*, No. A-4533-39, 2021 N.J. Super. Unpub. LEXIS 1497 (App. Div. June 7, 2021).

The current text of SB 1 (specifically in Section 2, Article 9 and Section 6) provides that IMLC provisions will not supersede member-states' law if the Compact's provisions conflict and, therefore, will uphold member state sovereignty. However, nowhere in the IMLC base provisions, all of which must be adopted by every joining member, does the Compact expressly state that the New Mexico Reproductive and Gender-Affirming Health Care Protection Act, or any other state-specific statute relating to the reproductive or gender-affirming medicine, will supersede the provisions of the IMLC. The only state statutes specified that will supersede IMLC provisions are the member-states' medical practice acts.

This is important for two reasons. First, the investigative subpoena provisions of the IMLC may allow the IMLC Commission to issue investigative subpoenas for New Mexico physicians if those physicians are also licensed in other member states and legally practice reproductive and/or gender-affirming care in New Mexico that is illegal in other states, even though such actions would directly violate the New Mexico Reproductive and Gender-Affirming Health Care Protection Act. While the language of SB 1 seemingly addresses this issue, courts may rely on precedent that interprets similar state statutory protections provisions as null because the member state willingly gave up their sovereignty for the administrative convenience of interstate licensure.

However, the IMLCC issued a position statement on December 1, 2023, in response to the U.S. Supreme Court overturning *Dobbs v. Jackson Women's Health Organization*, 142 S.Ct. 2228 (2023). *See*, IMLC Position Statement, at 4 (Dec. 1, 2023). In this statement, the IMLCC notes that it will interpret any conflicting member state laws as follows:

Simply stated, under the IMLC scope of practice provisions a physician who attempts to perform an abortion or gender affirming care where it is prohibited is subject to be disciplined to the extent that state's regulatory board wishes to pursue it. That same physician who performs abortions or gender affirming care under a license issued by a state which permits such care to a patient is protected against other states attempting to impose discipline on physicians providing such care to a patient located in that state at the time of treatment under those scope of practice provisions.

*Id.* While this is encouraging in that it appears that the IMLCC will respect the provisions

of SB 1 as written, some courts' interpretations of similar conflicts arising between interstate compact mandates and specific state legislation differ from the IMLCC's position above.

For example, in Delaware River Joint Toll Bridge Commission v. Oleksiak, the Eastern District Court of Pennsylvania held that compacting states (i.e., member states) bear the consequences of including "sweeping grants of authority and foregoing sovereignty preserving provisions." 612 F. Supp. 3d 428, at 446 (E.D. Pa. 2020), *aff'd sub nom. Delaware River Joint Toll Bridge Comm'n v. Sec'y Pennsylvania Dep't of Labor & Indus.*, 2021 WL 97430 (3d Cir. Jan. 12, 2021) ("[T]he compacting states understood the plain language of the sweeping grant of authority they provided to the Commission."). This echoes the presumption that interstate compacts are "the subject of careful consideration before they are entered into and are drawn by persons competent to express their meaning and to choose apt words in which to embody the purposes of the high contracting parties." New Jersey v. Delaware, 552 U.S. 597, 615-16 (2008) (quoting Rocca v. Thompson, 223 U.S. 317, 332 (1912)). Federal courts may rely on this precedent to conclude that New Mexico intended to contract away its sovereignty.

Importantly, while this is a legal grey area for New Mexico, the Tenth Circuit, and the IMLC—there seems to be no federal case law addressing the IMLC specifically from the Tenth Circuit—the reasoning in the district and circuit court decisions aligns with a long-standing principle that a state may not impose state law on a compact agency that is not reserved in the compact. *See*, Jeffrey B. Litwak & Elie Steinberg, Developments in Interstate Compact Law and Practice 2021, 51 Urb. Law. 283, 295–96 (2022). In addition, the IMLCC's position statement (*supra.*) is not binding and less influential on courts' judicial review than precedential case law, even if the case law is not from the Tenth Circuit.

In sum, while there is no way to predict how courts will interpret any potential conflicts that the IMLC provisions may have with the New Mexico Reproductive and Gender-Affirming Health Care Protection Act, it is important that, should SB 1 be enacted, the New Mexico Legislature is aware of all the ways in which federal courts may interpret the statute upon judicial review.

## **PERFORMANCE IMPLICATIONS**

None.

## **ADMINISTRATIVE IMPLICATIONS**

None.

## **CONFLICT, DUPLICATION, COMPANIONSHIP, RELATIONSHIP**

SB 1 is almost identical to SB 46 and HB 243, which were both introduced during the 2025 Legislative Session. As of January 20, 2026, there are a few bills that also propose adopting various interstate compacts, including HB 10 (Physician Assistant Interstate Compact), HB 31 (EMS Personnel Licensure Interstate Compact), and HB 50 (Social Work Licensure Interstate Compact). Currently, these proposed bills are not companion bills, nor do they seem to directly conflict or with the IMLC because they address different subjects.

## **TECHNICAL ISSUES**

None.

## **OTHER SUBSTANTIVE ISSUES**

None.

## **ALTERNATIVES**

SB 1 does not include an effective date. If signed into law, the legislation would go into effect ninety (90) days after the New Mexico Legislature adjourns the 2026 session. However, according to Article 19 of Section 2, Article 20, the IMLC will go into effect and be binding upon legislative enactment. *See*, SB 1 § 2, Art. 19(A)–(B). Legislatures may wish to consider amending the language to include a clause that matches New Mexico legislative procedure.

## **WHAT WILL BE THE CONSEQUENCES OF NOT ENACTING THIS BILL**

Status quo.

## **AMENDMENTS**

None.