

**From:** [Chris Mechels](#)  
**To:** [Burmeister, Christopher, DOH](#)  
**Cc:** [Mim Chapman](#)  
**Subject:** [EXT] 7.8.2 Rulemaking comment #2  
**Date:** Wednesday, August 26, 2020 9:20:05 AM

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Dear Sir,

It seems that this proposed change has been overtaken by events, making it unwise at present.

It seems from the record of the earlier 7.9.2 Rulemaking, that the DOH Secretary, early in 2020, pre Covid, wished to lower the age of employment to expand the labor pool, for nursing homes, etc .

Then came Covid. The NM unemployment rate, 4.5 at the end of 2019, is now at 13.3, and figures to get even higher as business failures are now common.

<https://www.dws.state.nm.us/en-us/Researchers/Data/Labor-Force-Unemployment>

The labor pool has expanded. There is no need for the proposed change.

Furthermore, the change would have us putting more young people, 16-18, into situations involved Covid dangers, where their inexperience could be dangerous to the patients, and them.

Two good reasons to abandon an idea which was originally questionable.

Regards,

Chris Mechels  
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