



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 08-033

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated January 2005.]

2. Form, Style and Placement in Administrative Code

a. The material inserted by the board under “Explanation of Agency Authority” is not an “explanation.”

b. In s. VFF-EMT 1.02, the underscored language should be preceded by the word “and” and placed, instead, after the comma following “technical services.”

c. In SECTION 3, “VFF-EMT 1.03” should precede “(6m).” See s. 1.04, Manual.

d. In SECTION 4, “VFF-EMT 1.03” should precede “(9).” See the example in s. 1.04 (2) (a) 4., Manual.

e. In SECTION 5, the title to VFF-EMT 1.04 should not appear. See s. 1.05 (3) (c), Manual.

f. In VFF-EMT 1.04 (1), the underscored “to first responders in any municipality” should be deleted.

g. In s. VFF-EMT 1.04 (4), the underscored “a first responder service” should be deleted, the following “or” should be stricken and followed by an underscored comma, and the underscored language “or that jointly authorize first responders to provide first responder services” should follow the comma following “emergency medical technicians.”

h. In SECTION 6, the title to VFF-EMT 1.06 should not be shown.

i. In SECTION 7, “VFF-EMT 1.07” should precede “(6).” It is noted that the revision to VFF-EMT 1.07 (6) is not mentioned in the board’s analysis. Note, also, that the provision now references both “separate *and* distinct” municipalities and “separate *or* distinct” services.

j. In SECTION 8, the title to VFF-EMT 1.08 should not be shown. Section VFF-EMT 1.08 (1) should be revised in such a manner that it more closely tracks current s. 16.25 (3) (j), Stats.

k. In SECTION 9, “VFF-EMT 1.10” should precede “(2).” In the text of VFF-EMT 1.10 (2), the initial reference to “first responder,” in the underscored material should be replaced by “first responder service.”

4. Adequacy of References to Related Statutes, Rules and Forms

In the board’s materials accompanying the rule, there is only one reference to the fact that Act 142 is 2005 Wisconsin Act 142 and that reference does not occur until the page preceding the text of the rule. It would be helpful if a complete reference to Act 142 were contained earlier in the materials.

6. Potential Conflicts With, and Comparability to, Related Federal Regulations

It is noted that, despite the treatment of VFF-EMT 1.08 (1), reference to “forfeiture” continues to appear in subsection titles and in the text of subs. (2) and (3).