



Wisconsin United for Freedom
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On May 5, 2020, the Joint Committee on Review of Administrative Rules (JCRAR) held an executive session on Clearinghouse Rule 19-079 and voted 6 to 4 to object to rules 1 through 5. This vote supported the vote cast by the Committee on Constitution and Ethics on March 5th, 2020, which the committee objected to these items due to arbitrariness, capriciousness, or imposition of undue hardship on the citizens of Wisconsin. A bill to support these objections will be introduced in the next session.

The specific rules opposed included:

Rule 1 - Change in the 'substantial outbreak' classification to include chicken pox, an illness historically considered mild prior to the introduction of a vaccine. This rule change would exclude children who are not immune from the illness even though data collected from the Wisconsin Department of Health Services (DHS) displays the significant failure of the vaccine to provide protection. Additionally, according to the CDC, most cases of chickenpox are occurring in fully vaccinated individuals, which This means that it is entirely possible that should an outbreak of chickenpox occur, all who are affected could be fully vaccinated. Excluding only unvaccinated children very likely would have little to no impact on the spread of illness but could cause great undue hardship for families whose children could be excluded for weeks at a time from school. This rule would also be updated to include meningococcal into the classification; however adding this rare disease to the "substantial outbreak" list has the potential to cause confusion should different strains of the disease occur than those found within the vaccine, or should the disease affect a child for which the vaccine is not routinely recommended, such as anyone under the age of 11.

Rule 2 – Change in the 'substantial outbreak' definition of mumps from *"an incidence of the disease exceeding 2% of the unvaccinated population"* to define 'substantial outbreak' as *"three or more cases linked by time and place."* Again, children who are not immune would be excluded from school, even though DHS's data once again shows that unvaccinated individuals are not developing mumps.

Rule 3 – Move the current recommendation of Tdap vaccine administration from 6th grade to 7th grade. This rule change is no longer necessary as the CDC recently revised its recommendations and stated that a Tdap dose administered at age 10 is still a valid dose.

Rule 4 – Mandating the meningococcal vaccine (MenACWY) for all 7th graders, with a booster dose in 12th grade. This vaccine does not prevent spread of the illness, though it may provide personal protection. Meningococcal disease is exceptionally rare, and rates of this disease had dropped significantly prior to the introduction of this vaccine in 2005. This vaccine will continue to be available to all families who wish to have their child receive it.

Rule 5 - Parents would no longer be able to report their child's chicken pox illness and would be required to see a healthcare provider to confirm infection. They would be responsible for all associated health care costs even though for most children, chickenpox is a mild illness that does not require medical care. Insisting that parents take their highly contagious child to a doctor puts others, including those who may be immunocompromised, at risk of contracting the illness.

Wisconsin United for Freedom is appreciative of the JCRAR committee members who listened to the concerns of Wisconsin parents.

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