October 11, 2024

Joint Committee on Administrative Rules

Boji Tower, 3rd Floor

124 W. Allegan St.

P.O. Box 30036

Lansing, MI 48909-7536

Sent via email to: JCAR@legislature.mi.gov

Re: Session day waiver request

Dear Chairperson Wojno, Alternate Chairperson Haadsma, and committee members:

As the regulatory affairs officer for the Michigan Department of State, I respectfully request that the Joint Committee on Administrative Rules waive the remaining session days under the authority provided in the Administrative Procedures Act of 1969, MCL 24.245a(1)(d), for the review of the following amended rules, which were submitted to the Committee on September 10, 2024:

Visual Standards For Motor Vehicle Driver's Licenses R 257.1 - R 257.5 (MOAHR #2023-55 ST).

The amendments to the Visual Standards For Motor Vehicle Driver's Licenses (R 257.1 - R 257.5) codifies current Department policy, which defines the visual standard and training required for eligibility of restricted driving privileges with use of bioptic or telescopic lenses.   Incorporating into the existing administrative rules makes the standards easily accessible to the public and other states.  The outcome is a consistent and reasonable standard, that is transparent and not subject to arbitrary change, to apply to the use of bioptic or telescopic lenses for the purpose of restricted driving privilege eligibility.

The Michigan Department of State accepted written public comment for a period of 64 days and held a public hearing on the proposed rules on August 7, 2024. The Department carefully considered the public comments, and ultimately made one change to the rules in response.

Given the importance of codifying the visual standard and training requirements, the Michigan Department of State respectfully asks that the committee waive the balance of the session days in the review period.

Thank you for your consideration of this request.

Sincerely,

Doug Novak

Regulatory Affairs Officer

Michigan Department of State

Novakd@Michigan.gov

cc: Timothy Reeves and Rachel Hughart, Legal Counsel, JCAR

Katie Wienczewski, Michigan Office of Administrative Hearings and Rules

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Jonathan Brater, Director of Elections

Adam Fracassi, Deputy Director of Elections/Regulatory Division Director