

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## ***RULES CLEARINGHOUSE***

**Ronald Sklansky**  
Director  
(608) 266-1946

**Richard Sweet**  
Assistant Director  
(608) 266-2982



**David J. Stute, Director**  
Legislative Council Staff  
(608) 266-1304

One E. Main St., Ste. 401  
P.O. Box 2536  
Madison, WI 53701-2536  
FAX: (608) 266-3830

## **CLEARINGHOUSE RULE 98-187**

### **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 September 1998.]**

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

In the second paragraph of the analysis to this rule, the first bracketed statutory citation should be changed to read s. 15.407 (6), Stats., as that is the statute that created the Pharmacist Advisory Council. The reference to s. 450.025 is more appropriately placed at the end of the paragraph, along with s. 450.02 (2g) (b), as those two provisions relate, respectively, to the requirements placed on the council and the Pharmacy Examining Board relating to administrative rules.

#### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. In the fourth paragraph of the analysis, the last sentence is awkwardly worded and could be rewritten as follows: “These requirements are modeled after requirements in s. 450.035 (2), Stats., for pharmacists administering vaccines.”

b. In the fifth paragraph of the analysis, the notation “sec.” on line 4 should be changed to “s.”

c. In the sixth paragraph of the analysis, the word “patient” on line 4 should be plural.

d. The inclusion of definitions for the term “drug product” and “device” should be considered. As an alternative, s. Phar 7.10 (intro.) should include appropriate references to the

definition of “drug product” in s. 450.01 (11), Stats., and the definition of “device” in s. 450.01 (6), Stats. Also, in s. Phar 7.10 (intro.), a comma should be inserted after the word “techniques.”

e. Section Phar 7.10 (3) requires a pharmacist to have written procedures regarding the administration by injection of prescription drug products and devices in the course of teaching self-administration techniques to a patient. Is the pharmacist supposed to develop the written procedures himself or herself? Are the procedures reviewed by anyone?