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CLEARINGHOUSE RULE 99-085

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.]

2. Form, Style and Placement in Administrative Code

a. In several places in both the introductory material and the text of the rule, reference is made to “the state of Wisconsin Department of Agriculture, Trade and Consumer Protection.” The phrase “state of” is unnecessary and should be deleted in all occurrences. See the example after s. 1.02 (1), Manual.

b. In s. ATCP 15.02 (2) (intro.), the word “must” should be replaced by “shall.” [See s. 1.01 (2), Manual.]

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

a. In s. ATCP 15.02 (2) (c), the phrase “on a form under” should be changed to “as provided in.”

b. In the title to s. ATCP 15.04 (1), it is suggested that the word “expires” be changed to “expiration.”

c. In s. ATCP 15.06 (3), the comma on the second line should be deleted and the phrase “according to” on the second line should be changed to “in accordance with.” In sub. (6) (a) (intro.), the comma in the second sentence should be deleted.

d. In s. ATCP 15.08 (2) (intro.), the comma on the third line should be deleted.

e. In s. ATCP 15.09 (3) (intro.), it is suggested that the phrase “in writing” be inserted after the phrase “shall document.” Also, in sub. (3) (a), the comma on the second line should be deleted.

f. Section ATCP 15.09 (6) (b) provides that a person who twice fails an examination may not retake it. Is this provision meant to be a lifetime prohibition?

g. In s. ATCP 15.10 (2), for consistency with the other subsections, the word “The” should be inserted at the beginning of the sentence.