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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 99-129

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.]

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

a. In s. PI 6.03 (3) (a) 2., it appears that Grade I certificates will only be available to persons with a bachelor’s degree and a master’s degree from a library school program. Is the master’s degree intended to be substantially different from the currently required “fifth year” degree? If so, that change should be highlighted or at least noted in the analysis prepared by the agency. Also, the agency may wish to clarify when applicants will be required to meet the master’s degree requirement and whether more advanced degrees such as doctorates may be used to meet the requirement. See, also, s. PI 6.03 (6) (a) 1., where reference is made to a master’s degree “or the equivalent”; this does not appear to be consistent with s. PI 6.03 (3) (a) 2.

b. In s. PI 6.03 (3) (c) 2., applicants for Grade III certificates must have successfully completed “academic credit” for 54 semester hours. Elsewhere in the rule, reference is made to “receiving semester credits” [s. PI 6.03 (3) (b) 2.] and to “have completed” three semester credits. The clarity of the rule would be improved if consistent terminology were used.

c. Under s. PI 6.03 (6) (a), it is not clear how a person will be treated if completion of a written schedule will take longer than a year since the temporary certificate is valid for only one year and is not renewable under s. PI 6.03 (6) (a) 4.

d. In s. PI 6.03 (6) (d) 3. and 5., the term “contact hours of continuing education” is used, but in s. PI 6.03 (5) (a) and (b), the term used is “hours of continuing education.” If these

terms are meant to be the same, then the rule should be modified to use a single term instead of two. If different meanings are intended, they should be specified.

e. In s. PI 6.03 (7), it is not clear why persons with a provisional license must continue to work at the “same library.” The agency may wish to clarify this provision or specify the intended scope of the term “library” as used in the subsection.

f. Section PI 6.03 (7) (intro.) should conclude with a colon.

g. An “initial applicability” section would help to clarify when the rule will first apply.