

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## RULES CLEARINGHOUSE

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## CLEARINGHOUSE RULE 00-022

### 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. The rule does not contain a citation to statutes interpreted. [See s. 1.02 (2) (a), Manual.]
- b. “SECTION 1” should precede “ETF 10.01 (1k)” and “hereby” should be deleted. “SECTION 2” should precede “ETF 20.19” and “hereby” should be deleted. [See s. 1.04, Manual.]
- c. In s. ETF 10.01 (1k), the second sentence of the definition of “benefit approval date” should be moved since it contains additional substance. [See s. 1.01 (7) (b), Manual.]
- d. The colons following the titles of the subsections in s. ETF 20.19 should be deleted. [See s. 1.05 (2) (c), Manual.]
- e. In s. ETF 20.19 (2) (a), “(a)” should be deleted preceding “Creditable service.”
- f. In s. ETF 20.19 (2) (intro.), the citation to s. 40.25 (2), Stats., is not in proper format. [See s. 1.07 (2), Manual.]
- g. Throughout the rule, there are references to events occurring “before” and “after” January 1, 2000 and “on or after” January 1, 2000. It is suggested that consistent terminology be used throughout the rule (i.e., “before January 1, 2000” and “after December 31, 1999”).

- h. In s. ETF 20.19 (5), “The” should replace “Such.”
- i. The rule should contain an effective date provision. [See s. 1.02 (4), Manual.]