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# WISCONSIN LEGISLATIVE COUNCIL

## RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 01-134

#### 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. A number of substantive provisions are contained in the definition of “internship in the practice of pharmacy” in s. Phar 1.02 (4e), making the definition awkward and unduly complicated. See s. 1.01 (7) (b), Manual, regarding the inclusion of substance in a definition. It is suggested that the substantive aspects of the subsection be included in a separate section of the Administrative Code.

b. It is suggested that s. Phar 1.02 (4e) (c) begin with “The practice of pharmacy by” instead of “For.” In that same sentence, a period may be placed after “committee” and the remaining language deleted (see the last sentence of the paragraph). In the last sentence, it is suggested that reference be made to “the” person rather than “a” person.

c. In s. Phar 1.02 (4e) (d), it is suggested that the first sentence begin with “The practice of pharmacy by” instead of “For” and a period inserted after “state.” The remainder of the current sentence should be adjusted accordingly to become a complete sentence. In the second sentence, the first “any change of a supervising pharmacist shall be disclosed in the initial application” should be deleted because it is subsequently repeated in the sentence.

d. In s. Phar 2.01 (2), “~~board~~” should be inserted after “~~internship~~.”

e. It is suggested that s. Phar 2.02 (1) (d) 1. can be redrafted to begin as follows: “A statement from the dean or the academic records office of the school of pharmacy certifying . . . .”

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

- a. In s. Phar 1.02 (4e) (c) and (d), references to “under this section” are incorrect.
- b. In s. Phar 2.02 (1) (d) 2., the “and” in the reference to the Administrative Code provision should be changed to “or.”

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

- a. The department’s analysis is confusing in that it describes five classes of interns and five categories of internship experience. The two groups seem to be related. If so, can they be consolidated?
- b. In the department’s analysis, in the fourth, fifth and sixth paragraphs, “defines” should be replaced by “includes.”
- c. In the fifth paragraph of the department’s analysis, it is suggested that “and who” be inserted after the first “internship” and “need” replace “needing.”
- d. In the third full paragraph on page 2 of the department’s analysis, “types of” in the last sentence may be deleted.
- e. In the paragraph of the department’s analysis that begins at the bottom of page 2, it appears that some words are missing from the second sentence.
- f. In s. Phar 1.02 (4e) (b), it is not clear to what “which is not acquired in a practical experience program” refers.
- g. In s. Phar 1.02 (4e) (d), last sentence, the use of “up to” in the context of that sentence is unclear.