



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Ronald Sklansky
Clearinghouse Director

Richard Sweet
Clearinghouse Assistant Director

Terry C. Anderson
Legislative Council Director

Laura D. Rose
Legislative Council Deputy Director

CLEARINGHOUSE RULE 05-122

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 January 2005.]

2. Form, Style and Placement in Administrative Code

- a. In the treatment clause for SECTION 3, “(intro.) and (a) to (g)” should be deleted.
- b. The acronyms CEH and ETN should be defined in ch. MPSW 15 or 19.
- c. Is there any need to include in the rule a provision indicating when some or all of the provisions of the rule first apply?

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

In the analysis, ss. 457.10 (3) and 457.11, Stats., are cited as statutes interpreted. However they do not appear to apply to continuing education or the requirements for a therapist after receiving a license or certification.

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

- a. In s. MPSW 19.01 (4m), it may be clearer if “during each two-year licensure period” was inserted at the end of the first sentence.
- b. In s. MPSW 19.02 (5), a comma should be inserted after “sponsored.”
- c. In s. MPSW 19.02 (8) (a) to (g), the material separated by a colon should be written as two separate sentences for clarity. Alternatively, a phrase such as “for the number of CEHs specified” could be inserted at the end of the sentence for s. MPSW 19.02 (8) (intro.).

Also, in pars. (a) to (e), “shall be granted” should be replaced with “may be granted.” [See s. 1.01 (2), Manual.]