



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 06-060

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.]

1. Statutory Authority

Section 440.88, Stats., requires the department to promulgate rules to establish minimum standards and qualifications for certification of substance abuse counselors. The proposed rules only set forth what constitutes unprofessional conduct and describe how to renew expired certificates.

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

In s. RL 164.01 (1) (b), the second period following Stats. should be deleted

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

a. The chapter titles should be more descriptive so that a person looking for the rules related to substance abuse professionals may find the appropriate chapters more easily.

b. In s. RL 164.01 (2) (intro.), “, but is not limited to,” should be deleted. A similar comment applies to pars. (c) and (i).

c. In s. RL 164.01 (2) (a), “or” before “deceitful” should be deleted and a comma should be inserted after that word.

d. In s. RL 164.01 (2) (b), a comma should be inserted after “abetting a violation of”.

e. In s. RL 164.01 (2) (i), “or” should be inserted before “reporting.”

f. In s. RL 164.01 (2) (L), the “or” before “mental anguish” should be deleted and a comma should be inserted after the phrase.

g. In s. RL 164.01 (2) (r), “a description of what may be expected in the way of” might be better phrased as “a reasonable description of anticipated.”

h. In s. RL 164.01 (2) (w), it appears that “or with any other request for information by the department” is repetitive and should be deleted. Also, in the second sentence, “to a department request” should be inserted after “to respond.”

i. In s. RL 165.01, is the renewal fee set forth in another chapter? If so, it would be helpful to provide reference to it.