



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 08-008

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. Reference in the explanation of agency authority should be made to the statutory requirement in s. 560.285 (3), Stats., that directs the department to contract with a tax exempt entity to administer the grant program.

b. In s. Comm 156.20 (3), the second sentence does not appear to be definitional. If retained, it should be combined with the first sentence--“...manufactured home, that is intended to....”

c. In s. Comm 156.20 (9), “but not limited to” should be deleted.

d. In s. Comm 156.20 (5), the term “who’s” should be replaced with “whose.”

e. Generally, dashes should not be used in drafting where other punctuation options are available. [See s. Comm 156.20 (5) and (9).]

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

a. For clarity purposes, the term “municipality” should be defined so that the intended scope of the term is clear.

b. The rule is not entirely clear with regard to the application process and the administration of grants. The rule could be explicit about the application process in s. Comm 156.30 only being for the nonprofit entities that seek to administer the program, not for the ultimate recipients, such as homeowners or municipalities. This aspect is clear from the

“application package” appended to the rule, but not from the rule itself, or the analysis prepared by the agency.

c. Is there a need to specify in the rule the criteria to be used by the administering entity in making individual grants?