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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 10-072

#### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated September 2008.]**

#### **2. Form, Style and Placement in Administrative Code**

At the top of the first page, it is unnecessary to list the rule chapter title: “Coverage and Related Reports Chapter DWD 110”. However, if it is listed, the complete title of the chapter should read: “Coverage and Related Records and Reports Chapter DWD 110”.

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

a. The following comments pertain to the plain language analysis:

(1) The analysis should clearly and concisely explain what the rule does. As written, it is hard to extract the substantive changes being made. First, the analysis could note that 2007 Wisconsin Act 59 made a number of changes to ch. 108, Stats., which then necessitates some changes in current rules to comport with new statutory requirements. The rule changes should then be clearly described. It would be helpful to briefly describe each SECTION that contains substantive changes. It is not necessary to do so for SECTIONS containing grammatical changes only.

(2) The analysis should explain why s. DWD 110.07 (1), (5) and (7) are being repealed.

b. In the treatment clause to SECTION 4, the comma after the “(d)” should be replaced by the word “and”.

c. The treatment clauses to SECTIONS 5 and 9 should end with a period rather than a colon.

d. In SECTION 6, s. DWD 110.07 (2) is renumbered sub. (1) due to the repeal of sub. (1). However, later subsections following repealed provisions are not renumbered. Is there a reason for this inconsistency? Subsections that are not being repealed could retain their current numbering. However, if sub. (2) is renumbered sub. (1), “DWD 110.07 (1)” should be inserted after “renumbered” in the treatment clause.

e. In s. DWD 110.07 (3), the phrases “each employer” should be replaced by “an employer”. The entire rule should be checked for other occurrences. Also, the statutory citation should be followed by “Stats.”.

f. In s. DWD 110.07 (4), on line 7, the “or due to” could be deleted and a comma inserted after “weather”. Also, there is a stray asterisk following this provision. In addition, the name of the division should be lower case.

g. In s. DWD 110.07 (6), the phrase “by the close of the month next following the end of each month” is awkward and should be reworded for improved clarity. This could be replaced by, for example: “for a particular month by the last day of the next month.”.

h. In s. DWD 110.08 (2), there should be a space before “the” on line 2.