



---

---

## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

---

---

**Richard Sweet**  
*Clearinghouse Director*

**Pam Shannon**  
*Clearinghouse Assistant Director*

**Terry C. Anderson**  
*Legislative Council Director*

**Laura D. Rose**  
*Legislative Council Deputy Director*

### CLEARINGHOUSE RULE 10-146

#### 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**

It appears that s. DHS 1.06 (3) (e) creates two new terms, “open client records” and “closed client records.” Section DHS 1.06 (3) (d) does include the process for closing a record, but does not define what it means for a client record to be open or closed. The department should consider defining these terms.

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

a. It is unclear under s. DHS 1.03 (20) what it means for a responsible party to have a “permanent inability or unlikely future ability to pay.” The department should consider defining what this term means and clarifying how the ability to pay is determined.

b. Section DHS 1.06 (3) (e) requires open and closed records to be made available for audit to any person. Is this the intent of the department? If not, the department may want to consider clarifying who may be able to audit the records or how the department determines who may conduct an audit.