WISCONSIN LEGISLATIVE COUNCIL
RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 12-054

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 November 2011.]**

2. Form, Style and Placement in Administrative Code

a. In the introductory clause, the enumeration of provisions treated by the proposed rule should be revised as follows: "AN ORDER to amend ETF 10.01 (3i), 10.63 (1) (a) to (f), (2) and (3), and 40.10 (1), (2) and (3) (e); to repeal and recreate ETF 20.015 (1) and (2); and to create ETF 10.86".

b. Under the statutes interpreted section of the analysis, the sections described should be concluded with ", Stats.".

c. Throughout the proposed rule, the use of underscores should be reviewed with regard to indicating commas and periods as new or old material.

d. In SECTIONS 8 and 9, would the rule text be more easily clarified by reference to previous subsections, rather than referring to the lengthy subject created by the department's amendment?

e. IN SECTION 10, the creation of s. ETF 10.86 should include a title (perhaps "Electronic Deposits") and the paragraph should be preceded by the selected title.

f. The form of titles in SECTION 11 should conform to s. 1.05, Manual. A period should follow s. ETF 20.015 (title).

g. The note in s. ETF 40.10 (1) (a) is confusing. The paragraph refers to two-thirds of full-time employment; the note refers to the definition of full-time employment. The department

may wish to clarify the note by indicating that two-thirds of full-time employment is equal to (2/3) x (1904).

 h.   The rule text should include an effective date section.   [s. 1.02 (4), Manual.]

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

The second "2." in s. ETF 10.63 (1) (e) 2. is duplicative and should be eliminated.