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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 13-031

#### 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 to the proposed rule, the enumeration of provisions treated by the rule should be formatted in the style indicated by the example following s. 1.02 (1), Manual.

b. In SECTION 2, the department should avoid the use of parentheses. [s. 1.01 (6), Manual.] Additionally, use of “but are not limited to” is superfluous. [s. 1.01 (7) (d), Manual.]

c. It appears the department intends, in SECTION 4, to renumber s. VE 1.02 (10) as VE 1.02 (9) rather than VE 1.02 (8), as indicated in the treatment clause of that section.

d. In SECTION 5, it appears likely that the department intends for the proposed renumbering to read: “VE 1.02 (10m), (11m), and (12) are renumbered to VE 1.02 (10), (12), and (13)”.

e. Section VE 7.06 (24) (Note) appears to be a policy statement. Does the Note clarify this subsection of the rule? [See s. 1.09, Manual.] Notes may not include substantive requirements and are not part of the substantive law. The department should consider clarifying the reference to the rabies control program referred to in this Note, as it does not appear directly related to s. VE 7.06 (24) or to s. 453.075, Stats.

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

- a. In s. VE 1.02 (3m), the phrase “techniques practice...” should be written “techniques practiced...”.
- b. In s. VE 7.01 (1), the department should either change “media” to “medium” or delete “any”.
- c. Each paragraph of s. VE 7.03 (2) and (3) should end with a period. [s. 1.03 (4), Manual.]
- d. Section VE 7.03 (3) (g), as indicated in the rule text, reads “meat or milk withholding” while the comparable text in the existing rule reads “meat or milk withholdings”. Which is correct?
- e. The department should consider removing the hyphen between “medically” and “pertinent” in s. VE 7.03 (3) (j) and (4) (m).
- f. Section VE 7.03 (3) (j) refers to “communication” and s. VE 7.03 (4) (m) refers to “communications”. Which is correct?
- g. “Note” should be indicated with **bold** type in s. VE 7.06 (24).
- h. In s. VE 7.06 (24) (Note), the department should remove the comma after “local health department” to clarify the use of the statutory cross-reference.
- i. The department should consider clarifying the language in ss. VE 7.06 (25) and 9.05 (13). For example, the text could be rewritten to state: “Advertising a specialty or claiming to be a specialist unless the (veterinarian / veterinary technician) is...”.
- j. In s. VE 7.06 (25), the department should capitalize “medical” and “specialties”.
- k. In ss. VE 7.06 (25) and 9.05 (13), the department should add “by” after “or” and before “a foreign veterinary specialty organization” and “a foreign veterinary technician specialty academy”.
- l. In s. VE 7.06 (26), the department should add “to” after “or” and before “public health”.
- m. In SECTION 17, the department should add a title to the effective date provision. [See s. 1.02 (4), Manual.]