



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz and Jessica Karls-Ruplinger
Clearinghouse Co-Directors

Terry C. Anderson
Legislative Council Director

Laura D. Rose
Legislative Council Deputy Director

CLEARINGHOUSE RULE 14-013

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. The proposed rule contains extensive renumbering to reorganize existing material. It is generally best to avoid renumbering, especially when inserting new rule sections or subunits, eliminating a gap in numbering, or reusing a previously existing number that is eliminated by repeal. Renumbering impairs the ability to trace a provision’s history and may result in ambiguity or error. The agency should review its use of renumbering to ensure that such renumbering is necessary and consistent with ss. 1.03 (5) (a) and (c) and 1.067, Manual. Additionally, in the introductory clause, it is not necessary to include the section numbers of the renumbered sections as they will appear once renumbered. Instead, the agency should list only the sections of current law that are treated by the rule order. [See s. 1.02, Manual.]

b. In SECTION 7, “, (1) (note),” should be added after “(1)” in the treatment clause. Additionally, the statutory reference in the note should conform to the style used elsewhere in the proposed rule.

c. In SECTION 11, the order of strike-through and underscore in s. SPS 192.204 (2) (b) should conform to s. 1.06 (1), Manual.

d. In SECTION 22, the strike-through in s. SPS 192.213 (4) should be extended through the “s” at the end of the phrase “mixed martial arts”.

e. In SECTION 25, the term “Note” in the treatment clause and text should read “(note)”. Additionally, the statutory reference in the note should conform to the style used elsewhere in the proposed rule.

f. In SECTION 27, the agency should include the word “The”, using strike-through text, at the beginning of s. SPS 192.301 (22). [s. 1.06 (3), Manual.]

g. In SECTION 41, the un-capitalized word “neoprene” should be underscored in s. SPS 192.406 (10).

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

a. In SECTION 6, the phrase “a contestant and their seconds” in s. SPS 192.102 (10) should be revised to read “a contestant and his or her seconds”.

b. In SECTION 24, the agency should review the added text in s. SPS 192.301 (9). The language does not appear to make sense as written.