



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 14-063

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

Generally, the board should consider repealing and recreating s. MPSW 1.09, rather than repealing s. MPSW 1.09 and creating s. MPSW 1.095.

4. Adequacy of References to Related Statutes, Rules and Forms

a. In the rule analysis, the board should include s. 440.08, Stats., in the description of statutes interpreted, because s. 457.02 (5m), Stats., provides that “The examining board shall consider the requirements for qualifying as a certified substance abuse counselor, clinical supervisor, or prevention specialist under s. 440.88” when promulgating the rules under s. 457.02 (5m), Stats.

b. If creating s. MPSW 1.095 rather than repealing and recreating s. MPSW 1.09, the board should amend the cross-references to s. MPSW 1.09 that are present in the following administrative code provisions:

- (1) s. DHS 75.02 (84) (d).
- (2) s. DHS 75.03 (4) (e).
- (3) s. SPS 161.01 (1), (2), and (5).
- (4) s. SPS 165.01 (1).

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

a. To enhance the clarity of the proposed rule, the board could rephrase the first sentence of s. MPSW 1.095 (1) (a) as follows: “A minimum of 135 contact hours of substance use disorder education, which may be obtained during the course of earning the degree or in addition to the degree.”.

b. To enhance the clarity of the proposed rule, the board could rephrase s. MPSW 1.095 (2) (b) as follows: “A minimum of 200 hours of face-to-face client treatment with individuals diagnosed with substance use disorders, under the supervision of a qualified supervisor...”.

c. In s. MPSW 1.095 (3) (a) 2. d., the board should insert “on the person’s” before “significant others”.