



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 15-053

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 December 2014.]

2. Form, Style and Placement in Administrative Code

In current s. OT 3.05, the words “Failure to be registered” are included as a title and repeated as a fragment of rule text. SECTION 2 of the proposed rule would create a new title for this section of code. It would also strike the current title, but would leave the extra fragment of rule text. Instead, should SECTION 2 strike both references to “Failure to be registered”?

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

In SECTION 4 of the proposed rule, it appears the inserted language carving out licensees who have unmet disciplinary requirements, or whose licenses have been suspended or revoked, should refer to “This subsection...” (instead of “This section...”).

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

- a. In SECTION 6 of the proposed rule, the text of par. (f) should end with a period.
- b. In SECTION 12 of the proposed rule, the phrase “each individual ordered” should be changed to “each individual referred”.
- c. In SECTION 13 of the proposed rule, the text of par. (f) should end with a period.
- d. In SECTION 14 of the proposed rule, the reference to “Wisconsin administrative register” should be changed to “Wisconsin Administrative Register”.

e. The plain language analysis includes discussion of a proposed change to clarify that occupational therapists are able to self-refer occupational therapy services. However, the issue of self-referral is not clarified in the text of the proposed rule.