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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 15-069

#### 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

a. In the introductory clause of the proposed rule, the department should provide an enumeration of provisions treated by the rule, organized in the style prescribed by s. 1.02 (1), Manual.

b. In SECTIONS 3 and 26, the order of stricken and underscored text should conform to the style prescribed by s. 1.06 (1), Manual.

c. In SECTIONS 8 and 31, prohibitions should be expressed in the style described in s. 1.01 (2), Manual.

d. The introductory material in SECTION 11 does not conform to the style described in s. 1.03 (3), Manual. Citations to introductory material in the proposed rule should refer to such provisions as (intro.) instead of [preamble]. All introductory material in the proposed rule should be reviewed for conformity with this Manual provision.

e. SECTION 20 is not an introductory clause, and therefore should not be referred to as such. (As proposed, this provision is referred to as “[preamble]”.)

f. In SECTION 21, there do not appear to be any items under this introductory clause, and numbering below the subdivision paragraph level is not permitted.

g. It appears that the references to s. Trans 300.54 (1) (a) 1. p. and 1. t. are inconsistent and later referred to in SECTION 22 as “1p.” and “1t.”. The department should clarify the inconsistency.

h. All SECTIONS of the proposed rule that “repeal and create” rule text should instead “repeal and recreate” the text.

i. The use of the punctuation mark “/” in SECTIONS 13, 40, 48, and 50 should be revised. See s. 1.01 (9), Manual, for guidance on the avoidance of slashed alternatives.

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

This entire proposed rule should be reviewed for clarity, grammatical errors, and readability. Multiple provisions in the rule do not constitute complete sentences, use terms the meaning of which are unclear, and fail to convey to the reader the intended regulatory impact. In particular, revisions are necessary in SECTIONS 3, 10, 11, 13, 15, 16, 17, 19, 20, 21, 22, 26, 32, 33, 39, 41, 43, 45, 48, 49, and 50.