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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 16-003

#### 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.]**

#### 1. Statutory Authority

Section 118.19 (3) (a), Stats., requires the department to accept accreditation of an educational program by a programmatic accrediting organization. It requires that a regional or national institutional accrediting agency be “recognized” by the U.S. Department of Education (DOE) but does not appear to extend the requirement of DOE recognition to a programmatic accrediting organization. Could the department explain its statutory authority to extend the requirement of DOE recognition to programmatic accrediting organizations in s. PI 34.01 (1)? Is the department aware of programmatic accrediting organizations that are not recognized by DOE? Did the department consider other means to define qualified programmatic accrediting organizations?

#### 2. Form, Style and Placement in Administrative Code

In ss. PI 34.241 (1m) (a) 1. and 34.242 (1) and (a), the phrase “a regionally-accredited” should be stricken entirely and followed by “an accredited”.

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

For clarity, “and the approved program..” in s. PI 34.05 (4) could be written “if the approved program...”.