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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 16-008

#### 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. The analysis to the rule should explain the reasons that the rule changes are proposed and the impact of the proposed changes. For example, the portion of the analysis that discusses SECTION 1 of the rule-making order should explain how the proposed license application requirements differ from the requirements under the current rule, why those changes are proposed, and what impact the proposed changes will have on applicants.

b. All of the treatment clauses of the rule-making order should be rewritten to comply with proper format. [s. 1.04 (1) (b) 1., Manual.]

c. SECTION 2 of the rule-making order is not in proper sequence. The SECTIONS of the rule-making order should be arranged according to the numerical order of the decimal-numbered rule provision being treated. [s. 1.04 (1) (a), Manual.]

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

a. Throughout the analysis, when using the term “section” to refer to a portion of the rule-making order, the term should be written in small capital letters. [s. 1.04 (1) (a), Manual.]

b. The first sentence of the paragraph of the analysis describing SECTION 1 of the rule should specify the type of license to which the sentence refers.

c. In the paragraph of the analysis describing SECTION 3 of the rule, an explanation of what is meant by “the scope of his or her supervisor” should be provided.

d. In the first sentence of the paragraph of the analysis describing SECTIONS 5, 6, and 7 of the rule, the word “Section” should be changed to “SECTIONS” and the word “repeals” should be changed to “repeal”.

e. In the paragraph of the analysis describing SECTION 8 of the rule, the word “is” should be changed to “are”.

f. Proposed s. MPSW 16.01 (1) is grammatically incorrect and should be rewritten. Consider separating the two requirements.

g. Why does the proposed rule eliminate the requirement, in current s. MPSW 16.01 (1) (a) 1., that a license applicant provide a certificate of professional education, signed and sealed by the chancellor, dean, or registrar of the school or college to prove they have met the required educational requirements?

h. Why does the proposed rule eliminate the requirement, in current s. MPSW 16.01 (1) (b), that the required hours of practice be completed in no less than two years? In addition, the current rule requires an affidavit stating that the required hours of practice have been completed. The proposed rule states that “evidence” must be submitted. Why is this change proposed?

i. Current s. MPSW 16.01 (1) (a) 3. allows an applicant to submit test scores from the Test Of English as a Foreign Language (TOEFL) or an equivalent score on an equivalent examination. The proposed rule allows scores only from TOEFL to be submitted. Why is this change proposed?

j. Why does the proposed rule eliminate the requirement, in current s. MPSW 16.01 (1) (d), for an applicant to submit verification of the applicant's credential in all jurisdictions in which the applicant has ever been credentialed?

k. In s. MPSW 16.01 (2) (b) of the proposed rule, a citation to “s.” should be inserted before the reference to “MPSW 16.02”. [s. 1.07 (2) (2<sup>nd</sup> Note), Manual.]

l. Current s. MPSW 16.02 (intro.) and (1) specify that in order for education to be considered substantially equivalent to a degree from an accredited institution, the courses or studies making up that education must be provided by an accredited college or university. The proposed rule does not contain this requirement. The rule should set forth minimal standards for the providers of courses that may be considered to be the educational equivalent of a degree granted by an institution accredited by COAMFTE.