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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 16-076

#### 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’s enumeration of provisions treated in the proposed rule, the types of treatment should be listed in the following order: to repeal; to renumber; to renumber and amend; and to amend. [s. 1.02 (1) (b), Manual.]

b. SECTIONS 11 and 12 of the proposed rule could be combined into one SECTION. When two or more subunits of the same rule section are affected by the same treatment, and any intervening subunits are unaffected, they may be included in the same SECTION of the proposed rule. [s. 1.04 (2) (a) 4., Manual.]

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

Consider revising the format of the rule summary’s explanation of agency authority to paraphrase, rather than copy, each section of statutory authority. Also, consider then explaining in plain language how that authority connects to the subject matter affected by the proposed rule. For example, consider rephrasing both sentences that provide a conclusion that the cited rule provisions are “clearly authorized” under the statute, to instead describe the statutory authority for the department to address the subject matters that are affected in those cited rule provisions.