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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 17-024

#### 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**

In the rule summary’s section on statutory authority, it is not necessary to cite ss. 45.03 (2) and 227.10 (2m), Stats. Those citations could be removed from that listing and from the explanation of agency authority. The remaining citation, to s. 45.50 (2m) (f), Stats., specifically requires the department to promulgate rules related to the program. [s. 1.02 (2m) (a), Manual.]

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

a. In the introductory clause that lists the provisions treated by the proposed rule, the listing of the types of treatment should include all treatments made in the rule, should be grouped in the order specified in s. 1.02 (1) (b), Manual, and should include precise citations. Altogether, the enumeration of treated provisions should appear as follows:

...to consolidate, renumber, and amend VA 18.02 (1) (a) and (b); to amend VA 18 (title) and VA 18.02 (2) and (3); to repeal and recreate VA 18.02 (1) (intro.); and to create VA 18.02 (1) (e), relating to....

b. The rule summary’s listing of the deadline for submission of comments should specify the date of the public hearing or how a reader could determine that date.

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

In the rule summary’s explanation of agency authority, the word “shall” should be revised to the phrase “is required to”.