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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 18-029

#### 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**

The agency should review the reference to successorship, in its amendment of s. A-E 3.03 (1), with respect to the agency’s authority to prospectively allow future programs to satisfy a portion of the agency’s experience requirements. For comparison, consider the discussion of improper delegation in s. 2.08 (1) (Note), Manual, relating to incorporation of standards by reference.

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

For purposes of clarity, it may be helpful to provide additional background information in the plain language analysis regarding the components of the architectural experience program referenced in the proposed amendment of s. A-E 3.03 (1).