



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE RULE 20-021

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

SECTION 2 of the proposed rule amends s. SPS 33.025 to require that a private security person “have on their person” certain permits. Relatedly, s. SPS 35.01 (4m) currently provides that a credential holder’s failure to have certain permits on his or her person may constitute unprofessional conduct. However, in the proposed rule, SECTION 5 replaces the phrase “have on his or her person” with the word “possess” in s. SPS 35.01 (4m). The department may consider using consistent phrasing among these related sections, so that the requirement under s. SPS 33.025 adheres to the standard for misconduct under s. SPS 35.01 (4m).

4. Adequacy of References to Related Statutes, Rules and Forms

In SECTION 3 of the proposed rule, the reference to “s. SPS 34.015 (5) to (8)” should be replaced with “s. SPS 34.01 (5) to (8)”.