



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 22-066

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

1. Statutory Authority

References to ss. 446.025 (3) (b) and 446.026 (3) (b), Stats., may be removed from the statutory authority and explanation of agency authority section of the rule analysis because the rule does not modify continuing education requirements for a chiropractic radiological technician or a chiropractic technician.

2. Form, Style and Placement in Administrative Code

a. The rule analysis listing of the deadline to submit comments should specify the date of the public hearing or how a reader could determine that date, rather than referring only generally to a “date to be determined”.

b. In s. Chir 5.01 (1) (i), the abbreviation “s.” should be inserted before the cross-reference to “Chir 5.02”. [s. 1.15 (2) (d), Manual.]

c. Consider adding an initial applicability clause to identify whether the revised rule applies to the renewal period that begins on December 16, 2022, or is intended to begin with the following renewal period. If the board intends the proposed rule to apply to the renewal period that begins on December 16, 2022, the clause could state: “This rule first applies to the renewal period that begins on December 16, 2022.”. [s. 1.03 (3), Manual.]

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

The last sentence of the plain language analysis section of the rule analysis sounds like material from a proposed rule scope statement rather than a proposed rule. This material should be modified to identify the actual change in the proposed rule: that the proposed rule adds a requirement that two of the 40 hours of continuing education required for a chiropractor must be on the topic of professional boundaries and ethics.