



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 22-067

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.]

2. Form, Style and Placement in Administrative Code

In the enumeration of provisions treated, the repealed rules should be separated by “and” instead of a semicolon, reading “...repeal Med 13.02 (1g), (1r), and (1v) and 13.03 (3)”. [s. 1.01, Manual.]

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

The proposed order cites s. 448.40 (1), Stats., as both the statute interpreted and one of the sources of statutory authority. Because the proposed rule specifically addresses continuing education training requirements, consider also citing s. 448.13, Stats., on biennial training requirements as a statute interpreted.

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

a. In the plain language analysis, it appears the agency duplicates text prepared for the scope statement associated with the proposed rule, and in doing so uses the future tense to describe possible agency actions. Compared to the scope statement, the verb tenses and specificity of the plain language analysis should be updated to reflect the actions actually proposed in the rulemaking order, rather than those contemplated at the time the scope statement was approved.

b. In SECTION 2 of the proposed rule, amending s. Med 13.03 (1x) (a), delete the comma following the first section of deleted text.