



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 24-009

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.]

3. Conflict With or Duplication of Existing Rules

As amended, s. PI 34.032 (3) will state that a permit is both valid for three years and that the permit expires on June 30 of the third year. Given the variable effective date provided in proposed s. PI 34.026 (1) (e), these statements appear to be in conflict, in at least some scenarios. Should the existing text of s. PI 34.032 (3) referring to a three-year permit term be stricken or further revised?

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

As it relates to the creation of s. PI 34.026 (1) (e), should the agency also revise s. PI 34.026 (1) (a) to reflect the creation of par. (e) and the reference to this credential as a permit rather than a license? Currently, the provision reads, “Except as provided in pars. (b) and (c)...”. Similarly, should par. (a) also be revised to recognize existing s. PI 34.026 (1) (d) as an exception?

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

In SECTION 3 of the proposed rule, there appears to be two typos in s. PI 34.032 (2) (b) 3. that the agency should correct. First, the sentence ends with a comma, when it appears it should end in a period. Second, the sentence reads: “Has successfully completed the minimum number of course credits required for the individual to have achieved junior level status **if enrolled in a teacher preparatory program in which the applicant is enrolled awards a bachelor’s degree.**” It appears that this bolded portion should instead read either “if the teacher preparatory program in which the applicant is enrolled awards a bachelor’s degree” or “if enrolled in a teacher preparatory program which awards a bachelor’s degree”.