



Wisconsin Legislative Council

RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE RULE 24-016

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

a. The plain language analysis for the proposed rule omits certain information that may be of interest to a reader. The description notes that it clarifies the rules for Tier 1 professional teaching permits relating to school district requests. However, it does not explain the new limitation and requirement imposed by the rule change: (1) that the recreated rule limits a permit-holder to teaching in a single school district; and (2) that the recreated rule requires a school district administrator to submit a request for the teaching permit. Additionally, the analysis does not explain that the recreated rule eliminates two current teaching permits – those for American Sign Language and Technology Education. A plain language analysis should contain sufficient detail to enable a reader to understand the content of the proposed rule and the changes made from the existing rule.

b. In s. PI 34.034 (4) (a), the abbreviation “s.” should be inserted before the reference to “PI 34.002”.

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

a. Section PI 34.034 (2) (a) states that a permit issued under the section authorizes the permit holder to teach in the school district that requested the permit “under sub. (3)”. This should cite to the more specific “(3) (e)”, which is the paragraph requiring a school district request for the license.

b. Section PI 34.034 (3) (b) requires an applicant to have demonstrated five years of professional work experience as defined under “sub. (1) (b)”. This citation should be to “sub. (1) (c)”, which defines “professional work experience”.

c. Section PI 34.034 (3) (d) requires an applicant to have completed an alternative teacher training program under sub. (4), “as defined under (3) (e)”. However, sub. (3) (e) refers to a school district request for the permit. This citation should be corrected or deleted.

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

a. In s. PI 34.034 (4) (intro.), a phrase such as “do all of the following” should be inserted after the word “shall”.

b. In s. PI 34.034 (4) (b), the word “through” should be revised to “to”. [s. 1.08 (1) (h), Manual.]

c. In s. PI 34.034, review each use of the word “license”. It appears that in most instances, other than in the defined phrase “license program content guidelines”, the word “license” should be revised to the word “permit”.