



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 24-028

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 following comments apply to the agency’s analysis for the proposed rule:
 - (1) In the plain language analysis, consider elaborating on the nature of the changes made by the proposed rule. 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. [s. 1.01 (2) (a) 5. and (b), Manual.]
 - (2) In the listing of the deadline to submit comments on the proposed rule, a specific date should be given, or a description of how a reader would determine that date, rather than stating “on a date to be determined”.
- b. In SECTION 3 of the proposed rule, the treatment clause can simply state, “A-E 2.02 (7) (a) is repealed”, as the treatment applies to the entire paragraph and its only subunit. Similarly, in the caption for the proposed rule, in the listing of affected provisions, s. A-E 2.02 (7) (a) can be listed without identifying the subunit.
- c. The following comments apply to SECTION 12 of the proposed rule, amending s. A-E 8.10:
 - (1) The treatment clause can simply state, “A-E 8.10 is amended to read”, as the treatment applies to the entire section. Similarly, in the caption for the proposed rule, in the listing of affected provisions, s. A-E 8.10 can be listed without identifying the subunits.
 - (2) In a number of the instances in which a word or phrase is shown with a strike-through and a new word or phrase is inserted with underscoring, the stricken word or phrase should be revised to precede the underscored word or phrase. For example, in s. A-E 8.10 (1), the text “~~and sign~~ or stamp” should be reversed and shown as “~~or stamp~~ and sign”. This also occurs in subs. (2) and (3).

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

In provisions of chs. A-E 2 and 8 that are not amended by the proposed rule, consider changing all references to “registrant or permit holder” to the phrase “credential holder”, in order to be consistent with the terminology used in the proposed rule. For example, references to a registrant or permit holder remain in ss. A-E 2.02 (4), 2.02 (6), 2.04, 8.04, 8.05, 8.06, 8.08, and 8.11. These provisions could be included and amended in the proposed rule. If added, the rule caption’s listing of affected provisions should also be updated.