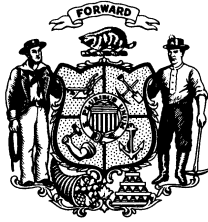


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CLEARINGHOUSE RULE 94-214

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

2. Form, Style and Placement in Administrative Code

a. The introductory clause of the rule should be redrafted to conform to the format set forth in the Manual. [See s. 1.02 (1), Manual.]

b. SECTIONS 1 and 2 of the rule should be combined into a single SECTION because two or more provisions of the same rules section are affected by the same treatment. The treatment clause should state: “Ind 70.03 (3) (intro.) and (e) 13 are amended to read:”. Similarly, SECTIONS 3 to 7 should also be combined into a single SECTION. [See s. 1.04 (2) (a) 4, Manual.]

c. This rule should be used to correct a number of drafting errors in s. Ind 70.03 (3) (intro.). For example, it is improperly drafted as introductory material since it does not end with a colon and lead into the subsequent paragraphs. [See s. 1.03 (8), Manual.] Also, “student learners” should replace “such minors.” [See s. 1.01 (9) (c), Manual.] Finally, the Board of Vocational, Technical and Adult Education is now called the Technical College System Board. [See 1993 Wisconsin Act 399.]

d. Throughout the rule, “Ind” should replace “IND” to reflect the manner in which the current rules are drafted.

e. In s. Ind 70.05 (1), the subsection title should not be shown. [See s. 1.05 (3) (d), Manual.]

Also, the amendments to the section and subsection titles in SECTIONS 6, 8 and 9 do not reflect proper drafting style. [See s. 1.05 (3), Manual.]

f. In s. Ind 70.05 (1) (b), “of” should replace “or.”

g. In the treatment clauses of SECTIONS 8 and 9, “and” should replace “&.” Also, “are” should replace “is.”

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

a. In s. Ind 70.03 (3) (intro.), “department’s” should replace “departments.”

b. In s. Ind 70.05 (2) (c), “that” should follow “except.”

c. In s. Ind 70.05 (4) (b), the acronym “GED” should either be spelled out or defined elsewhere in ch. Ind 70.