

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 98-064**

### **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 to the rule does not follow the format set forth in s. 1.02 (1), Manual. An introductory clause should enumerate each rule provision treated and the nature of the treatment.

b. In SECTIONS 2 to 15 and SECTIONS 18 and 19, following the treatment clause for each SECTION, the rule section number should be set forth immediately preceding the text of the affected rule. [See s. 1.04 (2), Manual.] For example, in SECTION 2, “Comm 114.02” should be inserted before “(1).” In the other SECTIONS, “Comm” should be inserted before the section number.

c. In SECTION 8, “The” should be stricken and replaced by “the.”

d. In SECTION 19, in the first sentence, the first “any” should be stricken.

e. In s. Comm 114.055 (2), “, (f) to (i), (j) and (k)” can be replaced by “and (f) to (k).”

f. The rule should include an effective date clause. [See s. 1.02 (4), Manual.]

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

a. In SECTION 8, a comma should be inserted after “such financing.”

b. Section Comm 114.08 could be simplified by substituting “solicit” for “be responsible for soliciting” and deleting the “ing” on the other verbs. Also, “be required to” can be stricken in ss. Comm 114.06 and 114.07.

c. Several provisions of the rule refer to an application manual. Will the manual contain forms? Where may a manual be obtained? [See s. 1.09 (2), Manual.] If any portions of the manual have the effect of law and meet the definition of a rule, those portions should be promulgated as rules. [See ss. 227.01 (13) and 227.10 (1), Stats.]