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CLEARINGHOUSE RULE 98-110

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. In all of the treatment clauses in the rule, a period should replace the colon.
- b. In SECTION 7, present s. Adm 19.06 is essentially being repealed and recreated in its entirety, and then renumbered as new s. Adm 19.05.

These changes should be accomplished in two separate SECTIONS of the draft. One SECTION should repeal present s. Adm 19.06. Another SECTION should create the text of new s. Adm 19.05 without strike-throughs and underscored language.

Also, “Department” should be lower case. The phrase “do all of the following” should precede the colon in s. Adm 19.05 (intro.) and “; or” should be replaced by a period in sub. (1).

- c. In s. Adm 19.08 (2), after “but,” “shall” should replace “will.” [See s. 1.01 (1), Manual.]
- d. In s. Adm 19.08 (3), should “under sub. (1)” be inserted after “resubmitted”? An applicant may presumably reapply several times if the applicant is not using the process under sub. (1).

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

Section Adm 19.04 (intro.), as renumbered and amended, states that applicants will be compared and rated based upon three items, one of which is “the scoring criteria in the CDBG

application package.” The department should review the provision to determine whether this package will contain any substantive material that is required to be promulgated as a rule. [See ss. 227.01 (13) and 227.10 (1), Stats.]