



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 01-043

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 September 1998.]

1. Statutory Authority

Section 459.24 (6) provides that upon application, the board may grant a temporary license to practice speech-language pathology or audiology during the completion of a postgraduate fellowship. However, s. HAS 6.10 (1) provides that “Before commencing a postgraduate clinical fellowship, an individual shall obtain a temporary license under s. 456.24 (6), Stats.” What statutory authority exists for the rule provision?

2. Form, Style and Placement in Administrative Code

a. The rule makes frequent use of phrases such as “include, but is not limited to.” The phrase “but is not limited to” is redundant and may be deleted from the rule.

b. In s. HAS 6.14 (intro.), “chapter” should be changed to “subchapter.”

c. Section HAS 6.14 (1) (b) does not follow grammatically from the introductory material in sub. (1) (intro.). This structural problem can be remedied by amending sub. (1) to read as follows:

(1) (a) “Assist in the practice in the speech-language pathology” means providing speech-language pathology services, while under direct supervision, that include any of the following:

...

(b) "Assist in the practice of speech-language pathology" does not include any of the following:

....

The same comments apply to sub. (2).

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

- a. In the note included under s. HAS 6.10, the first comma should be removed.
- b. In s. HAS 6.14 (1) (a) (intro.), if the phrase "but is not limited to" is retained, the word "is" should be replaced by the word "are." Also, in sub. (1) (a) 2. b., the third comma should be replaced by the word "or" and the last comma should be deleted.
- c. In s. HAS 6.14 (2) (a) (intro.), if the phrase "but is not limited to" is retained, the word "is" should be replaced by the word "are."
- d. In s. HAS 6.14 (4), "assist" should be changed to "assists."
- e. In s. HAS 6.15 (2) (a), "Speech-language pathologists" should be changed to the singular "A speech-language pathologist." A similar change should be made to "audiologists" in s. HAS 6.15 (2) (b) and (c).
- f. In s. HAS 6.18 (2) (intro.), "subs." should be changed to "sub."