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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 04-027

#### 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 2002.]**

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

a. The agency may wish to clarify the reference in s. PI 6.03 (5) (intro.) (a), relating to the five-year period prior to recertification that is granted for a certificate holder to obtain a renewal. It is not clear in the rule as drafted when the “five-year period” begins and ends. Further, in this same section, the reference to “100 contact hours” is used but not defined. Since this term also appears in several other parts of ch. PI 6, this may be a term that should be specifically defined to assure that its meaning is clear.

b. The rule in some sections refers to a course area by the term “public library administration course” (see s. PI 3.03 (6) (b) 4.) and in other cases to a “basic library management course” (see s. PI 6.03 (6) (c) 1.) Are these intended to be the same or different courses that must be taken in order to obtain a certificate? This should be clarified in the final rule.

c. The rule is somewhat confusing with regard to the length of time a renewal of a certificate can be made for and also how long after renewal the certificate will be valid. This is particularly true with regard to the change from three years to four years and the change proposed which would prohibit the certificate from being renewed “after four years.” From what point are the time periods measured? The agency may wish to add some clarity to this aspect of the rule either in the text of the rule or in the analysis prepared by the agency. Another uncertainty is whether the reference to years is to consecutive years or a cumulative number of years that may not necessarily be consecutive. For example, a problem may arise with regard to

the expiration of a certificate without completion of all of the course work. Is there some provision for this circumstance?