



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 11-028

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated September 2008.]

2. Form, Style and Placement in Administrative Code

a. In the treatment clause of SECTION 1, the word “read” should be inserted before the colon.

b. In SECTIONS 1 to 6, 8, 9, 11, 12, and 14 to 16, the text should be preceded by MPSW and the appropriate chapter, section, etc. For example, SECTION 1 should begin as follows:

MPSW 3.13 (1) (a) 1. To qualify as...

c. Throughout the rule, several words are capitalized that should be lower case. For example, see “Human Services” in s. MPSW 3.13 (1) (a) 1. b. and “Social Work” and “Section” in s. MPSW 3.13 (2) (intro.).

d. In the (intro.) of subd. 2. of SECTION 1, “1(b)” should be “1. b.”.

e. In SECTION 2, “(intro.)” should be inserted in the treatment clause between “3.13(2)” and “is”.

f. In SECTIONS 4, 8, and 14, newly created subdivisions, paragraphs, or subsections should not be underscored.

g. Throughout the rule, subdivision numbers should be followed by a period. For example, see the treatment clause of SECTION 4.

h. In s. MPSW 3.13 (2) (b) 2. (intro.), as renumbered, “do all of the following” should be inserted before the colon.

i. In s. MPSW 3.13 (2) (c), the parenthetical material should be worked into the text.

4. Adequacy of References to Related Statutes, Rules and Forms

a. The analysis of the rule indicates that the statutory section interpreted in the rule is s. 459.09, Stats., which relates to the renewal and posting of license requirements under the Hearing and Speech Examining Board. It appears the statutory interpretation portion of the analysis should refer to s. 457.08, Stats., relating to social worker certificates and licenses.

b. In s. MPSW 3.13 (1) (a) 1. a., “s. MPSW” should replace “section”.

c. In s. MPSW 3.13 (1) (a) 2. d., “sub.” should be inserted before “(3m)”.

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

a. In SECTION 1, under subd. 1. c., the sentence is unclear. There are two clauses referencing accreditation.

b. In SECTION 1, subd. 2. (intro.), “major” should be inserted between “services” and “means”.

c. In SECTION 3, par. (b), the word “shall” between the words “coursework” and “in” should be deleted.

d. In SECTION 3, par. (b), “with” after “evaluate” and before “individuals” should be deleted and “with” should be inserted after “engage” and “intervene”. Also, a comma should replace the word “and” following “values” and before “ethics”. Also, in this SECTION and throughout the rule, “shall” should replace words like “will”, “should”, and “must”.

e. There are several subunits in the proposed rule that need periods at the end. For example, see subdivision paragraphs a. to j. in SECTION 5.

f. In SECTION 8, subds. 8. and 9., the term “methods course” is used and is not defined. It is not clear what this term means.

g. In SECTION 9, par. (c), following the term “development”, the phrase “across the life span” should be underscored, as it is new language under the amendment. Also, the underscored “and” before “~~social~~” should not be underscored.

h. In SECTION 14, sub. (3m) 2., the words “collect”, “organize”, “interpret”, “assess”, “use”, “develop”, “determine”, “implement” and “refer” should end with “ing”. Similar changes are needed in subd. 3. Also, all of the subdivisions in sub. (3m) should be lettered paragraphs.

i. In SECTION 15, sub. (4), the word “which” between “employment” and “will” should be replaced by “that”.