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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 14-045

#### 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 November 2011.]**

#### **2. Form, Style and Placement in Administrative Code**

Section PI 80.02 should be written to describe what ineligible costs are instead of creating definitions of “community programs and services” and “ineligible costs” because these terms are not used in the newly created ch. PI 80. Currently, the rule only refers to “which costs are ineligible” in s. PI 80.01. [See, also, s. 1.01 (7) (b), Manual.] It appears the proposed rule identifies three classes of ineligible costs: (a) any cost associated with a program limited to school district pupils; (b) any cost associated with a program with a schedule that presents significant barriers to participation; and (c) any cost that would be incurred in the absence of a program. These items could be identified without a “definitions” section in the proposed rule. Also, it is likely that the Legislature contemplated more detailed guidance on, and examples of, the types of costs that are ineligible under s. 120.13 (19), Stats., rather than referring to “actual, additional” costs.

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

In s. PI 80.01 (1), a comma should be inserted after “cultural”.