



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 15-017

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 December 2014.]

1. Statutory Authority

The department should make it clear that the text included in the explanation of agency authority is quoted statutory language. This could be accomplished by inserting citations to the appropriate statutes.

2. Form, Style and Placement in Administrative Code

a. In the statutes interpreted section of the analysis, the notation “, Stats.” should be added after “s. 457.10”.

b. In the statutory authority section of the analysis, the notation “, Stats.” should be added after “ss. 15.08(5)(b) and 457.03(1)”.

c. Spaces should be inserted between the individual parts of a citation. In the statutory authority section of the analysis, “ss. 15.08(5)(b) and 457.03(1)” should become “ss. 15.08 (5) (b) and 457.03 (1)”. The same comment applies to SECTION 1 and SECTION 2 of the rule text.

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

a. In the plain language analysis, “Section” should be changed to “Sections”.

b. In the plain language analysis, the department should identify from which statute the two-year requirement was removed. This could be accomplished by inserting “from s. 457.10, Stats.,” between “2 years” and “when”.

c. In the Illinois, Iowa, and Michigan sections of the comparison with rules in adjacent states, “3000” should be changed to “3,000” and “1000” should be changed to “1,000”. The same comment applies to SECTION 1 and SECTION 2 of the rule text. Commas are used to mark groups of three digits.

d. In the description of Michigan law under the comparison with rules in adjacent states, “of” appears twice. One should be deleted.

e. In the analysis and supporting documents section, “revision” should be inserted after the first use of “rule” in the second sentence.

f. In s. MPSW 16.01 (1) (b), “lest” should be changed to “least”.