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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 15-071

#### 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.]**

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

In the Notes throughout the proposed rule, the agency should indicate its statutory references as “, Stats.,” rather than “of the Statutes”.

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

In s. SPS 210.30 (2) and (3), the agency should provide Notes offering guidance on how to obtain the forms referenced in each subsection.

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

a. In s. SPS 210.20 (2) (Note), there appears to be an extra period in the citation to s. 440.415, Stats.

b. In s. SPS 210.30 (4) (a) and (b), a period should follow “sub” in reference to sub. (3).

c. In s. SPS 210.30 (4) (b), does the agency intend to refer to “this paragraph” instead of “this section” as that reference is used in the last sentence of the paragraph? It would appear so, because par. (c) appears to apply to licensed companies with unmet disciplinary requirements and licensed companies whose licenses have been surrendered or revoked. Additionally, should a similar clause be added to par. (a)? Presently, the absence of a non-applicability clause in par. (a) and the language of s. SPS 210.30 (c) (intro.) and 1. make it unclear whether par. (c) is intended to apply to all surrendered or revoked licenses or just those surrendered or revoked

licenses that have not been renewed within five years of the renewal date. Relatedly, what procedures apply to the reinstatement of a license with unmet disciplinary needs when that application is made less than five years after expiration of the license?