



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 18-011

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 SECTION 9, the department could consider amending the acronym “VFF-EMT” to reflect the new terminology adopted by 2017 Wisconsin Act 12.

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

a. In the introductory clause, the department should replace the section symbols with “s.” or “ss.” and remove the reference to “Wis. Admin. Code.” [ss. 1.02 (1) and 1.07 (2), Manual.]

b. The department should review the formatting used for the statutory citations throughout the analysis of the proposed rule. [s. 1.07, Manual.]

c. In the summary of SECTIONS 14 and 15 in the section titled “Brief plain language summary of the proposed rule,” the reference to “sub. (1)” should be changed to “s. Adm 95.07 (1)”, to clarify the reference and distinguish it from s. 16.25 (1), Stats., discussed earlier in the paragraph.

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

a. The department should add a closing quotation mark to the text quoted from s. 227.11 (2) (a), Stats., in the rule summary’s section titled “Explanation of agency’s statutory authority to promulgate the rule under the statutes cited”.

b. In the rule summary's section titled "Brief plain language summary of the proposed rule", a hyphen should be inserted between "of" and "service" to read "15-years-of-service" in the description of SECTION 12, because the phrase "15-years-of-service" is being used as a single, hyphenated adjective for the noun "threshold".

c. In the summary of SECTION 13 in the section titled "Brief plain language summary of the proposed rule", the reference to SECTION 14 should be changed to SECTION 15.

d. In the summary of SECTIONS 14 and 15 in the section titled "Brief plain language summary of the proposed rule", the department could consider specifying in the last sentence that s. 16.25 (3) (g), Stats., contains the statutory directive that the partially vested amount must be less than that which is paid to a fully vested volunteer.

e. In SECTION 14 of the proposed rule, "who" should replace "that" in the first line of s. Adm 95.07 (2) (a).