



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Jessica Karls-Ruplinger
Legislative Council Acting Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE RULE 18-074

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

a. In s. Med 22.04 (5) (intro.), consider revising the phrase “if the applicant” to the phrase “if any of the following circumstances apply”. Each following subunit could then begin with the phrase “The applicant has”. [s. 1.03 (3), Manual.]

b. For better visibility, consider revising the formatting for the instances where a hyphen is inserted between compound words that are combined as an adjective. For example, consider showing “4-month intervals” first with a strikethrough of the phrase “4 month” and then with underscoring for the phrase “4-month”. This occurs in ss. Med 22.04 (9) and 22.05 (3) (a). [s. 1.06 (2), Manual.]

c. In s. Med 22.10, in order to use titles as shown for each paragraph under sub. (4), titles must also be created for each subsection in that section. [s. 1.05 (1), Manual.]

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

a. In s. Med 22.04 (5) (intro.), consider specifying who determines whether an oral examination is required, and clarifying whether an oral examination is mandatory or discretionary when any of the identified circumstances apply to an applicant. The current phrase, “may be required”, suggests that an oral examination is discretionary and may not necessarily be required even if the identified circumstances apply to an applicant. However, in proposed s. Med 22.05 (1m) (b), it appears that an oral examination is intended to be required. Consider, for example, revising the introduction to specify that the board (or the council, if appropriate) shall require an

applicant to complete an oral examination. Alternatively, the introduction could be simplified to state that “An applicant shall complete an oral examination if any of the following circumstances apply:”

b. In s. Med 22.04 (5) (f), consider explaining how the practice may have been “limited”. For example, does it mean practice over 1,200 hours but under some other amount? Or does it mean practice was intermittent in the last three years, or was limited by some other measure?