



Wisconsin Legislative Council

RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE RULE 23-053

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

2. Form, Style and Placement in Administrative Code

a. In SECTION 6 of the proposed rule, “NR 19.057 (2m)” should be added in bold before the text of the rule.

b. In proposed s. NR 19.0575, the section title should be indicated in bold text, as described in s. 1.10 (2) (b) 2., Manual. Additionally, it appears that the further subdivisions of s. NR 19.0575 (3) should be identified as pars. (a) to (e).

c. In SECTION 15 of the proposed rule, underscored text should follow stricken text, as described in s. 1.04 (4) (a) 2., Manual. In particular, the stricken periods should precede the underscored text.

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

a. In proposed s. NR 19.05 (3m), it would increase the proposed rule’s clarity if the word “Despite” were replaced with “Notwithstanding” or “Except as authorized under”.

b. In proposed ss. NR 19.057 (2m) and 19.0575 (2), “viral hemorrhagic septicemia” is lowercase, but it is capitalized in the current s. NR 19.057 (2). Should this term be capitalized throughout the proposed rule?

c. In s. NR 19.057 (3) (b), “employees” should be changed to “employee” to ensure the singular noun is used consistently in this provision. In sub. (3) (d), the department could consider making the record retention requirements for permit holders consistent with those for bait dealer license holders in s. 29.509 (4), Stats., by specifying that records must be kept for two years “after the expiration of a permit” and making records available for DNR inspection by request “at all reasonable hours”.