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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 94-217

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

1. Statutory Authority

As amended, it is not clear under s. DE 2.03 (5) (b) that the Examining Board may not require the former license holder to complete educational requirements or pass examinations that are more extensive than the educational and examination requirements for an initial license. [See s. 440.08 (3) (b), Stats.] The board should consider clarifying the text of the rule or inserting a note to the rule explaining the limitation on the board contained in s. 440.08 (3) (b), Stats.

2. Form, Style and Placement in Administrative Code

In s. DE 2.03 (5) (a) (intro.), “renewal” should be deleted and “renewal date” should precede “may.”

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

a. The rule makes several changes in ch. DE 2 to clarify that the necessary credential for a dentist and a dental hygienist is a license. However, the rule retains in ch. DE 2 the concept of “certificate of registration.” Is the latter necessary? [See, for example, ss. DE 2.02 (2) and 2.03 (7).] There does not appear to be reference to a certificate of registration either in ch. 440 or 447, Stats.

b. The department’s explanation of the treatment of SECTION 6 of the rule is not entirely accurate.