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CLEARINGHOUSE RULE 97-051

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.]

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

a. The agency may wish to require that any records retention system utilized be able to produce accurate and verifiable records. Also, it may be prudent to require any records system to include an index to the retained records. These considerations are particularly important for records stored in an electronic form.

b. The agency may wish to provide an “initial applicability” section to allow for a reasonable implementation and uniform application of the new requirements.

c. Section DFI-CU 57.01 refers to the “current” addition of a technical publication. The use of the word “current” can be vague. That is, does the word refer to the edition of the technical publication in existence at the time of the promulgation of the rule or the edition of the technical publication existing in the future? To resolve this ambiguity, it is preferable to refer to a dated edition of the technical publication. In the future, an amendment to the rule can be promulgated to accommodate a reference to a revised edition.

d. Section DFI-CU 57.01 refers to “the applicable rules of other state agencies and laws and regulations of federal agencies. Section DFI-CU 57.03 refers to “another state or federal law or agency having jurisdiction over the credit union.” It is preferable to consistently refer in both sections to “other state or federal laws, rules and regulations.”