

WISCONSIN LEGISLATIVE COUNCIL STAFF

RULES CLEARINGHOUSE

Ronald Sklansky
Director
(608) 266-1946

Richard Sweet
Assistant Director
(608) 266-2982



David J. Stute, Director
Legislative Council Staff
(608) 266-1304

One E. Main St., Ste. 401
P.O. Box 2536
Madison, WI 53701-2536
FAX: (608) 266-3830

CLEARINGHOUSE RULE 97-150

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

Is there any reason that the procedures referenced in s. IB 1.03 (3) and 1.05 (3) should not be promulgated as rules? [See ss. 227.10 (1) and 227.01 (13), Stats.]

2. Form, Style and Placement in Administrative Code

a. In several places, “Stats.” needs to be inserted after a statutory cite. For example, see the last paragraph of the analysis and s. IB 1.02 (5).

b. In s. IB 1.02, the definition of “chief investment officer” should precede the definition of “confidential information” in order to preserve alphabetical order.

c. Latin terms should be avoided in a rule. [s. 1.01 (1), Manual.] In s. IB 1.02 (10), can an appropriate English term be substituted for “de minimus” (e.g., minimal or nominal)?

d. Section IB 1.05 (2), first sentence: “provided” should be stricken and “only” should be deleted. Also, “shall” should replace “must” in that subsection.

e. In s. IB 1.08 (1) and (2), “(intro.)” should follow the subunit cite. In addition, in s. IB 1.08 (2) (b), the “(2)” should be deleted.

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

a. Consideration should be given to further clarifying s. IB 1.03 (1). In particular, the clause “or where a proposal for an investment or provision of services has been made to the board” is awkwardly stated.

- b. In s. IB 1.05 (2), last sentence, should the underscored “may” be “shall”?