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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 98-053

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. It appears that the applicability of the definitions in s. SFC 1.02 should be expanded to include ch. SFC 8.

b. In s. SFC 8.02 (1) (g), the section should also be authorized to issue a denial of an application for a waiver of the continuing education requirements.

c. In s. SFC 8.02 (2) (d), the comma after the number 1 in the last line of that paragraph should be deleted and the phrase “shall be” should be replaced by the word “are.”

d. Section SFC 8.02 (2) (e) provides that decisions regarding approvals of continuing education courses shall be made within 60 days after the regularly scheduled section meeting following receipt of the request for program approval. In conjunction with s. SFC 8.02 (2) (a), which requires submittal of an application for approval by a sponsor at least 75 days prior to the program date, it appears there will be instances in which a sponsor will not receive program approval in time for the course to take place. Should the rule require that course approval requests be submitted even further in advance of the program date than 75 days?

e. Section SFC 8.02 (2) (f) provides that courses sponsored by certain organizations are automatically acceptable to the section and need not be submitted to the section for approval. What if these courses do not cover one of the designated subject areas specified in s. SFC 8.02 (2) (b) 1.? Are they still acceptable to the section?

f. Throughout the rule, the term “biennium” is used. Is this intended to mean the same thing as a two-year certification period? If so, one or the other of these terms should be used consistently throughout the rule.

g. In s. SFC 8.02 (4) (c), a certificate holder is permitted no more than five hours of continuing education for published articles authored by the certificate holder. Does this mean that five hours total is given for all articles published, or five hours for each article up to 10 hours per biennial certification period?