

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 98-054**

### **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.]**

#### **2. Form, Style and Placement in Administrative Code**

The placement of “butorphanol” in s. 961.20 (4), Stats., should be in alphabetical order with the other substances currently contained in that subsection.

#### **4. Adequacy of References to Related Statutes, Rules and Forms**

The reference in the department’s analysis to s. 961.11, Stats., as a statute authorizing promulgation is insufficiently specific. Section 961.11, Stats., contains several different authorizations for promulgating rules to designate controlled substances. A specific reference for the authority used for this rule should be included in the analysis.