

WISCONSIN LEGISLATIVE COUNCIL STAFF

RULES CLEARINGHOUSE

Ronald Sklansky
Director
(608) 266-1946

Richard Sweet
Assistant Director
(608) 266-2982



Terry C. Anderson
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 00-097

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 September 1998.]

2. Form, Style and Placement in Administrative Code

a. Is the portion of the department’s analysis that describes the key features of the 2000 edition of the Uniform Standards of Professional Appraisal Practice prepared by the department or by the Appraisal Standards Board? If the latter, that should be indicated in the analysis.

b. The “key features” summary references consecutive line numbers to the text of the uniform standards. Those line numbers are not included in the rule. Therefore, the utility of the key features analysis is severely compromised. Consequently, no attempt was made in reviewing the rule to determine whether the analysis of the key features accurately reflects the uniform standards contained in Appendix 1. The line numbers should be included in the final version of the rule.

c. Does the “key features” analysis give appraisers adequate notice of the changes in the uniform standards?

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

If the key features analysis is not the product of the Appraisal Standards Board, it is suggested that in the first paragraph, first sentence, the word “released” should replace the phrase “that occurred.” The last sentence of that paragraph implies that the effective date is “based on the input of professional organizations, educators, regulators, and state enforcement agencies.” Presumably, the 2000 edition is based on that input. In the second paragraph, last sentence, it is suggested that “version” replace “action.”