

# WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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#### CLEARINGHOUSE RULE 01-098

### **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

The department's analysis does not indicate how the 2001 version of the Uniform Standards of Professional Appraisal Practice (USPAP) differs from the 1996 edition. Does the 2001 edition identify the differences? If so, that should be noted either in the department's analysis or in the text of the rule. If not, indication should be given where identification of the differences may be obtained.

Furthermore, the analysis fails to indicate that certified and licensed appraisers must comply with the standards in USPAP. [See s. RL 86.01 (1).]

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

Language in the appendix indicates that the 2001 edition of USPAP is effective January 1, 2001 to December 31, 2001. Is that intended to mean that after December 31, 2001, the rule is no longer in effect? Clarification is in order.