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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 06-010

#### 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 January 2005.]**

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

In s. NHA 3.03 (2), “must” should be stricken and replaced by “shall.”

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

a. In s. NHA 1.02 (1m), what is “qualifying education”?

b. In s. NHA 3.02 (6), a licensee may claim continuing education hours for courses at an accredited college or university if certain requirements are satisfied. One of the requirements, under par. (c), is that the licensee claim no more than 18 contact hours during the two-year period. However, under s. NHA 3.02 (1), a licensee must complete at least 24 contact hours during the two-year period. Should par. (c) be changed to refer to 18 contact hours from courses at an accredited college or university?

c. In s. NHA 3.02 (6) (b) and (c), the “2-year renewal period” is actually a two-year licensure period. It may be clearer to refer to the two-year period immediately preceding the application for renewal or the two-year licensure period.

d. In s. NHA 3.02 (7), “shall not be required” should be replaced with “are not required.”

e. In s. NHA 3.03 (5) (a) and (b), a comma should be inserted before “including.” Also, “; but not limited to,” should be deleted. Finally, a comma should be inserted before “and” in each provision.