



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 08-038

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

The definitions in s. ATCP 161.41 should be placed in alphabetical order. As drafted, subs. (6) and (8) are out of alphabetical order.

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

a. The rule refers to “direct costs” in s. ATCP 161.43 (2) (e), but does not define the terms. A definition could assist in determining the intended scope of the term.

b. In s. ATCP 161.43 (1), the introductory sentence would be clearer if it provided that grant funds may “be used to” reimburse the enumerated expenses.

c. The “Grant Limits” section of the analysis states that the contract period is up to two years, with a possible extension of up to one additional year upon request. However, s. ATCP 161.46 (2) does not include language about the one year extension upon request.