



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 08-050

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

a. The definition of “direct contact” in s. OT 1.02 (3m) is not in proper form. It should be redrafted along the following lines: “Direct contact’ means face-to-face communication or communication by means of telephone, electronic communication, or group conference.” It appears that the term “direct contact” is only used in s. OT 4.04 (3) and (4); consideration might be given to defining the term in s. OT 4.04 rather than OT 1.02.

b. The second clause of the last underscored sentence of s. OT 4.04 (4) (a) could be included in the previous underscored sentence so that it reads: “Direct contact with the occupational therapy assistant is for the purpose of reviewing the progress and effectiveness of treatment and may occur simultaneously or separately from the face-to-face contact with the client.” Note, in the last two underscored sentences, that use of “meetings” in connection with “direct contact” is misleading, given the definition of “direct contact.”

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

Does s. OT 4.04 (3) need to be amended in light of the definition of “direct contact” and the amendments to s. OT 4.04 (4) (a)?

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

It is recognized that the language of s. OT 4.04 (4) (b) is contained in the current rule and is merely being relocated. However, does reference to “in writing” need to be clarified?