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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 12-047

#### Comments

**[NOTE:** All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated November 2011.]

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

The agency might consider including an initial applicability clause in the proposed rule to specify when the changes made by the rule first apply. [s. 1.02 (3m), Stats.]

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

a. On page 1 of the rule summary, in the explanation of agency authority, “s. 15.085 (5) (b), and 440.035 (1), Stats.” should be replaced with “ss. 15.085 (5) (b) and 440.035 (1), Stats.” [s. 1.07 (2), Manual.]

b. On page 1 of the rule summary, in the related statute or rule section, “Wis. Admin. Code Pod 1 and Pod 3” should be replaced with “chs. Pod 1 and 3”. [s. 1.07 (2), Manual.]

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

a. On page 1 of the rule summary, in the explanation of agency authority, “Boards” should be replaced with “Board”, and “their” should be replaced with “its”.

b. On page 2 of the rule summary, in the plain language analysis, the word “who’s” should be replaced with “whose”.

c. On page 2 of the rule summary, in the plain language analysis, the agency should describe the “audit” that is referenced in the description of SECTION 3, perhaps by referencing s. Pod 3.04.

d. In SECTION 2 of the proposed rule, the words “satisfaction of the requirements of s. 448.665, Stats.” should be replaced with “satisfaction of the biennial training requirement under s. 448.665, Stats.” to be consistent with language in ss. Pod 3.01 (1) and 3.02 (1) (intro.).

e. In SECTION 2 of the proposed rule, all references to “podiatrists” should be replaced with “podiatrist”; all references to “Board” should be replaced with “board”; the word “a” should be inserted before “school”; and a period should be inserted after “Wisconsin”.

f. In SECTION 2 of the proposed rule, the agency should consider replacing “proof” with “evidence”.

g. The agency should consider rewriting the text of SECTION 3 of the proposed rule, as follows, to clarify that provision:

Pod 3.03 **(3)** A certified copy of an official transcript or diploma from an approved school of podiatric medicine and surgery from which the podiatrist graduated is satisfactory evidence of compliance with s. Pod 3.02 (4), provided that the requirements of s. Pod 3.02 (4) (a) and (b) have been met.

h. In SECTION 4 of the proposed rule, a period should be inserted at the end of the section.