



---

---

## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

---

---

**Scott Grosz**  
*Clearinghouse Director*

**Margit Kelley**  
*Clearinghouse Assistant Director*

**Terry C. Anderson**  
*Legislative Council Director*

**Jessica Karls-Ruplinger**  
*Legislative Council Deputy Director*

### CLEARINGHOUSE RULE 15-025

#### 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 December 2014.]**

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

Does the agency intend to repeal PI 26 Appendix? If so, the introductory clause should be replaced with the following:

The Wisconsin Department of Public Instruction proposes an order to repeal PI 26 Appendix; and to repeal and recreate PI 26.

For clarity, if the agency intends to maintain PI 26 Appendix, it may wish to indicate that intent in a Note at the end of the recreated ch. PI 26 or revise the introductory clause to repeal and recreate ch. PI 26 and PI 26 Appendix and simply recreate the Appendix in its current form.

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

a. The rule analysis should explain that existing rule provisions in ch. PI 26 regarding the education for employment program are being revised, and that new rule provisions regarding academic and career planning services are being added to the chapter.

b. In s. PI 26.03 (1) (intro.), the agency should refer to “school board” instead of “board”, because “school board” is a term of art used elsewhere in the chapter.

c. In s. PI 26.03 (2) (c) 2., the words “school” and “supervised” should be hyphenated as a noun and adjective appearing before a noun. [LRB Bill Drafting Manual 2.01 (2) (a) 2.; see also *Chicago Manual of Style* per LRB Bill Drafting Manual 2.001 (6).] Additionally, the terms “school-supervised” and “work-based” should be separated by a comma because they are coordinate adjectives.

d. In s. PI 26.03 (3) (a) and (c), the phrases “Each pupil shall receive” and “Each pupil shall have” should be removed, in order to reconcile the text of each paragraph with s. PI 26.03 (3) (intro.). Section PI 26.03 (3) (b) should also be revised to improve its transition from s. PI 26.03 (3) (intro.).