



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 16-013

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

The treatment of SECTION 1 of the proposed rule should be indicated as amending s. ATCP 1.03 (2) (b) (intro.).

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

a. Given the proposed amendment s. ATCP 1.03 (2) (b), is it helpful to maintain the material in s. ATCP 1.03 (2) (a)? While contemplated as an exception in s. ATCP 1.03 (2) (a), the content of s. ATCP 1.03 (2) (b), amended as proposed, appears to substantially negate the content of s. ATCP 1.03 (2) (a).

b. The rule summary states that “The proposed rule also amends s. ATCP 1.05 (1) and (3)(f) to clarify that, if a division administrator is designated to sign a special order, then the complaint seeking the special order must be signed by a different designee within the division”. However, s. ATCP 1.05 (1), amended as proposed, would provide “The complaint shall be signed by the division administrator, or designee, and shall comply with sub. (3)”. The rule, amended as proposed, does not specify that the complaint must be signed by a designee, rather than the division administrator, in instances in which the division administrator is designated to sign a special order.