



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Terry C. Anderson
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

Jessica Karls-Ruplinger
Legislative Council Deputy Director

CLEARINGHOUSE RULE 16-020

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

a. A relating clause should be inserted at the end of the proposed rule’s introductory clause, stating the subject matter of the proposed order. For example, “relating to advanced practice nurse prescribers”. [s. 1.02 (1) (a) and (Example), Manual.]

b. In the introductory clause’s listing of rule provisions treated in the proposed rule, and in the treatment clause for SECTION 3 of the proposed rule, the reference to s. “N 8.03 (intro)” should be revised to show a period in the designation “(intro.)”. [s. 1.03 (3), Manual.]

c. In s. N 8.03 (3), the reference to “This subs.” should be revised to “This subsection”. [s. 1.07 (2) (Table), Manual.]

d. In s. N 8.06 (3) (c), the text that is to be inserted, “, including attention deficit hyperactivity disorder”, should be underscored. [s. 1.06 (1) (a), Manual.]

e. In the text of SECTION 4 of the proposed rule, the renumbered provision should be shown as s. “N 8.03 (1m)”, rather than s. “N 8.03 (1)”. [s. 1.067 (Second Example), Manual.] Also, in the treatment clause, the spelling of the word “renumbered” should be corrected.

f. In the treatment clauses for SECTIONS 6 and 16 of the proposed rule, the listing of the consecutive subsections could be revised to an inclusive phrase. For example, “N 8.03 (2) to (5) are amended to read” and “N 8.10 (4) to (7) are amended to read”. This same comment applies to the introductory clause’s listing of rule provisions treated in the proposed rule.

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

In the following three locations, each reference to s. “N 8.02 (c)” should be corrected to include a reference to sub. “(1)” between “8.02” and “(c)”: the introductory clause’s listing of rule provisions treated in the proposed rule; the treatment clause for SECTION 1 of the proposed rule; and the text of the treated rule provision.

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

- a. The following comments apply to the rule summary’s plain language analysis:
 - (1) In the first paragraph, first sentence, the word “a” should be inserted before the phrase “doctoral degree”.
 - (2) In the fourth paragraph, first sentence, the word “a” should be removed.
 - (3) In the fifth paragraph, first sentence, the word “updates” should be in the singular.
 - (4) In the fifth paragraph, third sentence, the phrase “It removes” should be revised to “The Sections remove”.
 - (5) In the fifth paragraph, fourth sentence, a period should be inserted between the words “controlled substances” and “The Board”.
 - (6) In the last paragraph, second sentence, the word “is” that appears before “replaces” should be removed.
 - (7) In the last paragraph, fifth sentence, the word “has” after “prescriber” should be revised to “have”.
 - (8) In the last paragraph, final sentence, the phrase “and removing” should be revised to “and to remove”. The rest of the sentence could also be clarified by replacing the phrase “the physician shall document this relationship” with “that the physician document this relationship,”.
- b. In the rule summary’s plain language analysis describing SECTION 11 of the proposed rule, and in the text of SECTION 11, it appears that the word “deficient” should be corrected to “deficit”.
- c. In the rule summary’s comparison with Illinois, line 7, the word “is” after the word “license” should be revised to “are”.
- d. In the rule summary’s comparison with Minnesota, first sentence, the final word “nurses” should be in the singular.
- e. In s. N 8.045 (1), a comma should be inserted after the phrase “the workforce survey fee”.
- f. In s. N 8.045 (4), a comma should be inserted after the phrase “certified registered nurse anesthetist”.
- g. In s. N 8.10 (4), the word “urrent” should be corrected to “current”.
- h. In s. N 8.10 (5), a comma should be inserted after the word “physicians”.

- i. In s. N 8.10 (6), a comma should be inserted after the word “experience”.
- j. In s. N 8.10 (7), a comma should be inserted after the word “education”.