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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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**Scott Grosz**  
*Clearinghouse Director*

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

**Margit Kelley**  
*Clearinghouse Assistant Director*

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

### CLEARINGHOUSE RULE 16-033

#### 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. The purpose of the plain language analysis is to provide an understandable and objective description of the effect of the rule. It is not adequate to simply call these technical changes. Please describe each change made to the rule in specific. [See s. 1.02 (2) (b), Manual.]

b. In s. ETF 10.63 (1) (a) to (f), is it necessary to maintain distinctions between various types of reports and remittances, given the department’s proposed revisions to defer all due dates to dates determined by the secretary and communicated by means other than the administrative code? If such distinctions are not necessary, the need for s. ETF 10.63 (1) (intro.) should also be reviewed.

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

a. In SECTION 1, s. ETF 10.63 (1) (intro.) refers to “various” reports in the subsection. This is vague. Consider using the following to improve clarity: “Reports and remittances required under this chapter shall be submitted to the department as follows:”.

b. In SECTION 6, the lengthy description of to whom disclosure may be made is somewhat awkward. Consider listing the alternatives as separate paragraphs in order to improve clarity for the reader.