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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 17-010

#### 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. In s. Chir 10.03, the underscored phrase “a chiropractic radiological technician certified under ch. 446, Stats.” should be moved so that it follows the stricken-through text. Thus, it should appear near the end of the section as the following: “... ~~content of the course of instruction a~~ chiropractic radiological technician certified under ch. 446, Stats.”. [s. 1.06 (1) and (4), Manual.]

b. In the EFFECTIVE DATE section, the phrase “adopted in this order” should be omitted. [s. 1.02 (4), Manual.]

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

a. Section 446.026, Stats., requires an applicant for certification as a chiropractic technician to complete a course of study approved by the examining board. It appears that the proposed rule outlines the requirements for a course of study in both ss. Chir 10.015 and 10.02 (1) (a) to (m). However, it is not clear how the two provisions fit together. The board should consider consolidating ss. Chir 10.015 and 10.02 (1) (a) to (m) into a single section. In doing so, the board should consider the following questions and comments:

- (1) Why does the proposed rule refer to “course of study” in s. Chir 10.015 and “didactic and clinical training program” in s. Chir 10.02 (1) (f)? If the provisions are intended to refer to the same program, the phrase “course of study” should be used consistently in the rule and be consistent with s. 446.026, Stats.

- (2) Are the specific topics described in s. Chir 10.02 (1) (g) to (m) a requirement separate from the 4.5-hour therapeutic overview course in s. Chir 10.015 (1) (intro.)?
  - (3) Consider clearly outlining which components of the program are didactic and which components are clinical.
  - (4) Should the provision relating to the 4.5-hour therapeutic overview course in s. Chir 10.015 (1) (intro.) specify a minimum number of hours that should be dedicated to each course topic (i.e., anatomy, contraindications, and chiropractic technician scope of practice)?
  - (5) Consider replacing s. Chir 10.015 (1) (a) with the following: “Four hours of instruction in taking and preparing patient histories.”.
  - (6) Consider replacing s. Chir 10.015 (1) (b) with the following: “Four hours of instruction in conducting physical examinations, including taking height, weight, and blood pressure measurements.”.
  - (7) In s. Chir 10.02 (1) (a) and (b), replace both instances of the word “which” with “that”.
  - (8) In s. Chir 10.02 (1) (c), replace “by reason of which the individuals should be considered” with “that makes them”.
  - (9) In s. Chir 10.02 (1) (g), replace that paragraph with the following: “The program includes at least one hour on the performance of thermotherapy and cryotherapy.”. A similar comment also applies to s. Chir 10.02 (1) (h) to (m).
- b. In s. Chir 10.025 (1), consider outlining which components of the program are didactic and which components are clinical. In addition, should the subsection specify a minimum number of hours that should be dedicated to each course topic in pars. (a) to (L)?
- c. In s. Chir 10.05, the phrase “but are not limited to” should be stricken-through. [s. 1.01 (7) (c), Manual.]