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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 17-028

#### 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 introductory clause for the proposed rule lists the treatment of s. CSB 4.02 (11c) and (11n) as being amended, but in the rule those items are created. It appears the treatment listing in the introductory clause should be corrected.

b. In the rule summary’s explanation of agency authority, consider providing a brief plain language description of the authority, rather than repeating the statutory text. Likewise, in the plain language analysis, consider providing a brief description of the changes effected by the enactment of the cited Acts, rather than simply citing the Acts.

c. In the rule summary’s section for the analysis and supporting documents used to determine effect on small business or in preparation of economic impact analysis, an entry should be inserted. [s. 1.02 (2) (a) (intro.), Manual.]

d. In s. CSB 4.02 (11c), two of the statutory references should include the source citation “Stats.,”.

e. In s. CSB 4.02 (15g) and (17), the amended definitions for “pharmacist” and “practitioner” are phrased in a substantive rather than descriptive manner, and are unnecessary because the cited definitions under current law already include pharmacists and practitioners licensed in another state. Consider removing those changes. [s. 1.01 (1) and (7) (b) and (d), Manual.]

f. In SECTION 18 of the proposed rule, the treatment should be revised to “renumber and amend” as follows: “CSB 4.05 (1) is renumbered CSB 4.05 (1) (intro.) and amended to read:”. The listing in the introductory clause should then be updated to reflect this revision.

g. In s. CSB 4.06 (5), the second instance of the word “who” should be shown with a strikethrough, and should appear before the underscored word “that”. [s. 1.06 (1) (a), Manual.]

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

a. In the plain language analysis section of the rule summary, the sentence describing SECTION 1 is awkward and appears to be incomplete.

b. In the plain language analysis section of the rule summary, consider placing quotation marks around each defined word that is being described.

c. In the plain language analysis section of the rule summary that describes the definition of “healthcare profession” in SECTION 5, it appears the phrase should be corrected to “healthcare professional”.

d. In s. CSB 4.11 (9), the underscored period should be deleted.