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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 17-079

#### 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 both the introductory clause and the treatment clause for SECTION 1, the department should change the references to “in CR 13-009” to “as affected by CR 13-009”.

b. To accomplish the proposed changes in SECTION 1, the department should consider amending s. MPSW 14.01 (2) (b), rather than repealing and recreating the paragraph. By amending the paragraph, the new underscored language would better identify the change to the existing rule. [s. 1.065, Manual.]

c. In SECTION 2, the department could clarify the phrase “an institution which was accredited by its regional accrediting association”. For example, in s. MPSW 14.01 (1), course work must be completed at “an institution which was accredited by its regional accrediting association at the time the applicant graduated from the program”. Similarly, the department could consider adding clarifying language requiring accreditation at a specified time, such as the time that the applicant completed the course.

d. In SECTION 3, the department could consider adding the phrase “or doctoral degree in a field closely related to professional counseling or rehabilitation counseling” after “master’s degree” to maintain consistency with the language in s. MPSW 14.01 (1), which requires equivalency course work be “part of a program of studies leading to a master’s degree or doctoral degree in a field closely related to professional counseling or rehabilitation counseling”.

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

In the rule summary section titled “Related statute or rule”, the department could consider referring to ss. 457.01, 457.02, 457.06, 457.12, and 457.20, Stats.

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

a. All references to the Wisconsin Statutes in the rule summary should be capitalized by changing “stats.” to “Stats.”.

b. In the rule summary’s description of Illinois’s rule, the word “the” should be inserted before “Board” in the second-to-last sentence. Alternatively, the full title of the relevant board could be provided.

c. In the rule summary’s description of Michigan’s rule, the department could consider identifying the specific group supervision and equivalency requirements, if any, under the 2009 standards of the councils identified.