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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 18-021

#### 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

In s. Opt 8.02 (1g), it appears the cross-references should be to sub. (1c).

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

a. Under the proposed definition of “hour”, would a 300-minute period of lecture qualify as five or six hours of continuing education? May increments of less than one hour count toward the continuing education requirements?

b. Will the initial applicability of the proposed rule result in application to any licensees already in a two-year reporting cycle? If so, does the agency anticipate any conflicts or hardships that may be imposed during the initial applicability of the rule changes? For example, would any hardship arise for an optometrist who anticipated allocating seven hours of continuing education for “glaucoma education” under current s. Opt 8.02 (1) but is instead required to allocate 20 hours of continuing education related to “ocular health, conditions, or disease management”? Or, is it the agency’s intent that the previously required glaucoma education would also qualify as education relating to ocular health, conditions, or disease management?

c. The agency should clarify the relationship between a licensee’s hardship application for approval of a program under s. Opt 8.02 (1g) and a provider’s application for approval under s. Opt 8.03 (2). Is it the agency’s intent that a licensee may apply under the hardship provision but a provider must apply under s. Opt 8.03 (2)? If so, several of the conditions of application, such as the attendance requirements under s. Opt 8.03 (3), may not be easily satisfied by a licensee.