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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 20-024

#### 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**

The rule summary’s plain language analysis should be revised to provide a description of the effect of the proposed rule. The description should contain sufficient detail to enable the reader to understand the content of the rule and the changes made to the existing rule. For example, the description should identify that the proposed rule is amending the rules governing licensing of substitute educational interpreters to offer another avenue of licensure, and then should explain the current and the revised new method of obtaining licensure. [s.1.02 (2) (b), Manual.]

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

a. Under the rule summary’s heading for related statutes or rules, the agency should consider citing s. PI 34.086 (2), which provides the eligibility requirements for an educational interpreter, as it relates to the substitute educational interpreter licensure addressed in the proposed rule.

b. In the rule summary’s description of federal regulations, the list of what constitutes interpreting services under the Individuals with Disabilities Education Act (IDEA) should be revised to also include transcription services.

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

a. In s. PI 34.095 (2) (a), the agency could consider revising the rule to provide greater detail as to what constitutes a “passing score”. Greater detail should include what specifically

constitutes a passing score, or, as that information appears to be dependent on the recommendations of an advisory council, whether there are any other standards or resources that will be used to determine a passing score and, when set by the superintendent, where a reader could find what constitutes a passing score.

b. Section PI 34.095 (2) (a) refers to “*the* performance educational interpreter performance assessment”. However, from the text of the rest of the rule, it does not appear that the agency means to indicate that there is only one performance educational interpreter performance exam. If the agency indeed means to include several performance educational interpreter performance exams, it should revise the language to refer to “*a* performance educational interpreter performance assessment” instead. Alternatively, if there is only one exam, that should be identified with specificity.