

# Wisconsin Legislative Council

# RULES CLEARINGHOUSE

Scott Grosz Clearinghouse Director Margit Kelley Clearinghouse Assistant Director Anne Sappenfield Legislative Council Director

#### **CLEARINGHOUSE RULE 24-044**

### **Comments**

[NOTE: All citations to "Manual" in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

## 1. Statutory Authority

In the rule summary's listing of statutes interpreted, consider also citing ch. 443, Stats., more broadly, for the overall regulation of practice that is interpreted and implemented in ch. A-E 8.

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

- a. In Section 1 of the proposed rule, the amended language of s. A-E 8.03 (5) (b) is straying from the style standards for definitions. A definition should provide only the meaning of a term, without adding substantive provisions (such as "may be accomplished"). [s. 1.07 (3) (c), Manual.] The Board could consider adding only the phrase "all of" or "any of", and removing the other changes, as the current language maintains its clarity with the proposed changes.
- b. In SECTIONS 2 and 3 of the proposed rule, the Board could use the same terminology when referring to technology for purposes of remote supervision. In one instance "appropriate technology" with a longer definition is used and in the other instance the term "remote technology" is used. Relatedly, the Board could consider defining a term, like "remote technology", and using the term throughout the chapter, as the term has a meaning that is specific or narrower than what may otherwise be the general recognized or applicable meaning. [s. 1.07 (1) (a), Manual.]