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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 18-054

#### 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 the rule summary, it appears that the citations to ss. 456.02 (7), 456.03 (4), 456.05 (intro.), and 456.08, Stats., should be moved from the listing of statutory authority to the listing of statutes interpreted. [s. 1.02 (2m) (a), Manual.]

b. In s. NHA 4.01 (1) (intro.), the term “submit” is being inserted and should be underscored. [s. 1.06 (1) (a), Manual.]

c. In s. NHA 4.02 (2) (b), the sentence beginning with the phrase, “This paragraph does not apply to” should be rewritten in the singular tense. [s. 1.01 (9) (e), Manual.]

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

a. In s. NHA 2.01 (3), and elsewhere throughout chs. NHA 1 to 4, the term “board” is used. It is not defined, however, in s. NHA 1.02. The board should create a definition for this term.

b. In various places, the term “department” is capitalized. For example, the rule capitalizes the term when referring to the “department’s website” in s. NHA 2.02 (Note). This term should be in lowercase throughout the rule. [s. 1.01 (4), Manual.]

c. In various places, the introductory phrase “all the following” is inserted or adjusted to that phrasing. The phrase is grammatically incorrect. The board should insert or retain the word “of” in this phrase throughout the rule.

d. In s. NHA 4.02 (3) (a) (intro.), the phrase “has not been renewed within 5 years” is replaced with the phrase, “failed to renew a license within 5 years”. Does this mean that the applicant has not submitted a renewal application or that the board has not granted the renewal? The board should consider clarifying the meaning of this phrase.

e. In s. NHA 4.015 (intro.), consider either striking the comma at the end of the phrase “which has not been revoked or suspended”, or inserting a comma after the phrase “provided by the board”, in order to be grammatically consistent.