



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 20-071

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 November 2020.]

2. Form, Style and Placement in Administrative Code

A heading could be inserted at the beginning of the text of the rule to better separate that material from the analysis for the proposed rule. Compare, for example, the heading “Rule Text” that is given in CHR 20-067.

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

a. In the plain language analysis, the agency should consider clarifying that “alternative measures of performance” are alternatives to grade point average as a measure of performance. As it is currently written, it is unclear that the “alternative measures of performance” are alternative to grade point average. Is information available regarding the current extent of approvals of alternative measures by the state superintendent? Also, following the proposed amendments to the rule, does the agency have an expectation of how prevalent the use of alternative measures will be, as a percentage of total candidates?

b. In the summary of factual data and analytical methodologies, the agency states that “the proposed rule will ensure that entities using an alternative measure of performance are able to endorse each candidate for licensure while maintaining high standards in the use of each alternative measure”. Is this simply referring to how the rule requires the state superintendent to approve any alternative measures of performance? If so, approval from the state superintendent is not new with this proposed rule, but already exists; so this proposed rule does not further “ensure that entities

using an alternative measure of performance are able to endorse each candidate for licensure while maintaining high standards in the use of each alternative measure”.