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# Wisconsin Legislative Council

## RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 24-017

#### 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.]**

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

a. In SECTION 1, in the last sentence of s. PI 34.086 (5) (c), it is not clear what would receive “a July 1 effective date of the next school year”. It seems that it would be the renewed, regular license but the department should consider clarifying.

b. In SECTION 3, in the last sentence of s. PI 34.089 (4) (b), it is not clear what would receive “a July 1 effective date of the next school year”. It seems that it would be the renewed, regular license but the department should consider clarifying.

c. In SECTION 1, under s. PI 34.086 (5) (c) and SECTION 3, under s. PI 34.089 (4) (b), this timeline seems as though it could result in an indefinite gap in an individual’s licensure. For example, assume a person’s regular license expires June 30, 2024. If, by the expiration of the license holder’s regular license, the license holder has not met the renewal requirements, the license holder would be issued a one-year, nonrenewable license. In this example, this nonrenewable license would expire June 30, 2025. To receive a renewed license for the following school year, effective July 1, 2025, the license holder must complete the renewal requirements by June 30, 2025.

However, the proposed rule provides that this license holder can still renew his or her license if he or she completes the renewal requirements after June 30, 2025, but the effective date of this new license will be July 1 of “the next” school year. In the clearest example, if the individual misses the June 30, 2025 deadline but completes the renewal requirements by June 30, 2026, the license holder would get a renewed, regular license effective July 1, 2026.

Nonetheless, under the proposed rule, it also seems that an individual could have a licensure gap of several years, but still be eligible for renewal if the individual completes those renewal requirements at any point in time. For example, if a nonrenewable license expired on June 30, 2025, but the individual did not complete renewal requirements until May of 2028, the regular license would be renewed effective July 1, 2028. If this is not the department’s intent, the department should amend and clarify these portions of the proposed rule.