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# WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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## CLEARINGHOUSE RULE 19-130

### 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**

In s. Chir 5.02 (1) (b), the underscored material that begins with the phrase “the advancement” should be moved to follow all of the stricken material, including the next sentence that is stricken. The placement of the stricken period would also be moved to the end of the first sentence rather than the end of the final sentence, accordingly.

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

a. In s. Chir 5.01 (6), the phrase “as determined by the board” injects an element of ambiguity into the hardship provision, because it implies that a determination of hardship might differ, depending on context. However, the provision does not provide any criteria for the board to follow in distinguishing situations that meet the standard from those that do not. Consider adding criteria and procedures that the board should apply in making determinations regarding this issue.

b. In s. Chir 5.02 (4) (a) 4., the meaning of the added language is not clear. Consider separating the new information out as a stand-alone sentence, so that the general provision is stated first, and the exception (or rather, alternate deadline) for online programs is stated next, as a separate sentence.