



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 19-065

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.]

1. Statutory Authority

The department should add s. 440.071, Stats., as a statute interpreted by the proposed rule.

2. Form, Style and Placement in Administrative Code

The subsections under s. SPS 175.025 should be designated as subs. (1) to (5) rather than pars. (a) to (e).

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

a. Because the rule repeals s. SPS 175.01, the introduction to s. SPS 175.02 should be revised to specify that the requirements apply to an applicant for a certification of registration as a sanitarian. Similarly, should s. SPS 175.02 (2) require that an applicant submit a completed application on forms submitted by the department, as is currently required by s. SPS 175.01?

b. The cross-references in s. SPS 175.02 (4) and (5) should be listed as “s. SPS 175.025”.

c. In s. SPS 175.05 (1), the department should clarify what the “scheduled review of applications” is. Also, does the department intend to review sanitarian applications under standards that are different from those in ch. SPS 4? If so, this should be clarified.

d. The rule analysis should include an explanation of the amendment to s. SPS 175.05 (2), which removes the department’s responsibility to consult the advisory committee regarding investigations of applicants.

e. Who is required to provide notice to applicants regarding examination results and eligibility to take the examination under ch. SPS 176? Is this the department's responsibility?