



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

Jessica Karls-Ruplinger
Legislative Council Deputy Director

CLEARINGHOUSE RULE 19-075

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. SECTION 5 of the proposed rule creates s. A-E 4.025 (title) to read “Application for an engineer-in-training certificate.” However, a related title, s. A-E 4.05 (title), which is renumbered under the proposed rule, is phrased slightly differently to read, “Application for registration as a professional engineer”. The board should consider rephrasing s. A-E 4.025 (title) as “Application for certification as an engineer-in-training” so that it is consistent with other parts of the administrative code.

b. Section A-E 4.025 (b) references the statutory requirements for verifying the applicant’s education and training, or specific record of experience. However, s. A-E 4.05, which is renumbered by the proposed rule, lists these requirements out instead of cross-referencing the statute. The board should consider including those provisions directly in the rule so that it is consistent with other parts of the administrative code.

c. SECTION 9 of the proposed rule creates s. A-E 4.03 (1) (b) and (d). These two paragraphs already exist. The board should review the intent of this SECTION and revise the numbering of the paragraphs accordingly.

d. SECTION 12 states that s. A-E 4.05 (d) is renumbered par. (c), and amended. However, it does not appear that par. (d), as renumbered par. (c), is amended by the proposed rule. The board should review the intent of this SECTION and revise accordingly.

e. In SECTION 18 and other places in the proposed rule, the term “board” is replaced with the term “section”. However, the term that is currently used throughout chs. A-E, Wis. Adm. Code, is the term “professional engineering section”, which is the term used in the definitions found in ch. A-E 1. The board should consider replacing any reference to “section” with the term “professional engineering section”.

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

a. SECTION 3 of the proposed rule amends s. A-E 4.02 (1) to provide that a new application and fee may be required. The proposed rule does not specify when this may be required. The board should consider clarifying when, and under what circumstances, it may require a new application and fee to be submitted.

b. In SECTIONS 5, 23, and other parts of the proposed rule, it is unclear what the phrase, “with verification” means. The board should consider clarifying this phrase throughout the proposed rule.

c. In SECTION 12, s. A-E 4.026 (1) (a), the proposed rule amends the title of the entity that accredits the school or college of engineering. In doing so, the phrase “Engineering Accreditation Commission of ABET accredited school or college of engineering” is long and confusing. The board should consider reorganizing this phrase to be similar to the phrase in s. A-E 4.026 (2) (a), which reads “school or college accredited by the Engineering Technology Accreditation Commission of ABET”.