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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 19-117

#### 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.]**

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

Based on the plain language analysis, it appears the agency intends for SECTION 2 of the proposed rule to apply only to audits for continuing education (CE) compliance. However, as drafted, proposed s. Psy 4.05 (2) allows the agency to conduct any type of audit during an investigation, and does not require that the audit be only for the purpose of verifying CE compliance. Should s. Psy 4.05 (2) be revised to specify that the agency may conduct a CE audit? What other types of activities does the agency anticipate auditing? Additionally, in its plain language analysis, it appears the agency should more specifically explain that the proposed change is made in order to conform to s. 440.035 (2), Stats., as that particular subsection permits investigation of CE compliance only upon complaint against a credential holder.