



Wisconsin Legislative Council

RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE RULE 21-008

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.]

1. Statutory Authority

The agency cites its statutory authority for the proposed rule as s. 121.14 (1) (a), Stats. However, in its explanation of authority, the agency more specifically cites to s. 121.14 (1) (a) 1., Stats. The agency could consider being more specific in its statement of statutory authority by citing to s. 121.14 (1) (a) 1., Stats., rather than to s. 121.14 (1) (a), Stats.

4. Adequacy of References to Related Statutes, Rules and Forms

In its summary of factual data and analytical methodologies, the agency states that “[t]he proposed rule will create consistency between the rules governing how virtual courses are aided during the summer and interim sessions and the regular school year”. The agency could consider referencing the rules related to aiding virtual courses during the regular school year in the related statute or rule section.