

Style Guide Comments

From: Currin, Margaret P. <currinm@campbell.edu>
Sent: Wednesday, December 2, 2020 8:49 AM
To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>
Subject: [External] Re: RRC Style Guide Comments

Page 3. Clarify that use of “their” is for plural only. Thx.

MPC

Margaret Person Currin

From: Masich, Molly <molly.masich@oah.nc.gov>
Sent: Monday, December 7, 2020 8:09 AM
To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>
Subject: Style Guide

When you review the style guide, please consider adding a section for mailing addresses. Since they are generally recognized, using NC and PO Box should be preferred. Not long ago, an agency changed an address listing within a rule by spelling out North Carolina.

Molly Masich
Codifier of Rules

From: McGhee, Dana <dana.McGhee@oah.nc.gov>
Sent: Wednesday, January 13, 2021 11:39 AM
To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>
Subject: style guide

I was just proofing a rule and thought of something that might be helpful in the style guide. When citing multiple statutes in rules it is best to put G.S. before every citation. This helps when searching rules for a specific statute. Like in this type of instance.

(k) The employing agency shall provide the results of a completed and processed form AOC-CR-280, Law Enforcement Application for Verification of Expunction under G.S. 15A-145.4, G.S. 15A-145.5, G.S. 15A-145.6, G.S. 15A-145.8A or G.S. 15A-146, for each applicant presented for certification.

From: Cramer, Jill <jill.cramer@labor.nc.gov>
Sent: Thursday, January 7, 2021 7:17 PM
To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>
Cc: Rose, Carla <carla.rose@labor.nc.gov>
Subject: RE: RRC Style Guide Comments

Ashley

I have looked over the Style Guide. It appears extremely helpful to creating and amending rules. Thank you and all of the staff who worked on this.

Jill F. Cramer
General Counsel
NC Department of Labor

From: Everett, Jennifer <jennifer.everett@ncdenr.gov>
Sent: Friday, January 8, 2021 2:24 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Cc: Lane, Bill F <Bill.Lane@ncdenr.gov>; Everett, Jennifer <jennifer.everett@ncdenr.gov>
Subject: Re: RRC Style Guide Comments

Good Afternoon,

The Style Guide has been very helpful for staff within the Department of Environmental Quality. The effort that went into developing this guidance is greatly appreciated, especially those new to rulemaking. We have a few suggestions to be considered for additional guidance and examples.

- 1) Chapter 9, History Notes. Provide a short discussion of what other types of statutes are needed besides the one which gives authority to the agency to develop or amend rules(s). Or which statutes to avoid adding, besides statutes that are repealed, that would be considered unnecessary or excessive.
- 2) Chapter 10, Citations. Specifically in Section 10.3, Citing Rules and Regulations, provide greater detail on how to refer to specific portions of a rule. For example, what the parts of a rule is called when it's in Paragraph format versus Item format. And when to call it a Part versus Sub-Item. For example, how should the reference be worded if referring to a Part within the same Paragraph, or to a Part or Subparagraph within a different Paragraph of the same rule, or to a division of a Sub-Item?
- 3) Chapter 11, Incorporation by Reference. A short explanation about why and when a rule would need to incorporate by reference another agencies' rule would be helpful. Also, having additional examples of what does not need to be incorporated by reference besides General Statutes. For example, websites that provide guidance or best practices documents.

Thank you for allowing the opportunity to comment on this helpful tool. If you have any questions, please contact us.

Sincerely,

Jennifer

From: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>

Sent: Monday, December 21, 2020 12:48 PM

To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>

Subject: Rules style guide

Hi Ashley,

I looked over the Rules Style Guide and found it to be very well done. Unfortunately most of my folks don't use it even though I have sent it to them. I am not sure if its because its so long or why they don't refer to it. If I had to guess, I would say it was because it was too detailed and long, rather than a quick reference document. However with that said, I don't think it needs to be changed. A lot of work went into it and the explanations are quite valuable. I do have a couple suggestions:

- The version I was sent did not have page numbers on the whole document. I am not sure if that was fixed or not. Fixing that would be helpful.
- A couple more examples in the Appendix of the refer by reference language would be helpful. When I refer to it, I can't find an example that suits my needs.
- Addition of an example of a rule with a definition in the text of the rule (when the definition is used only in that rule). The "for the purpose of this Rule, "definition" means" and have the example of it in the paragraph. I know you can also do it as a separate paragraph too and lead into the rule like that.
- There is no mention of hyperlinks of URLs and to not do it. My folks send me rules with website addresses and that's great but they don't remove the hyperlink when they send me the rule. It happens all the time, so I do it and then just underline it in the rule template. So if it could be mentioned that URLs should not be hyperlinked.

That's about all I can think of. Thank you for the opportunity to give feedback.

Nadine Pfeiffer

Rules Review Manager

Division of Health Service Regulation

NC Department of Health and Human Services

From: Pfeiffer, Nadine <nadine.pfeiffer@dhhs.nc.gov>
Sent: Thursday, January 7, 2021 10:24 AM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: Rules style guide

I have an overall suggestion for the Rules Style guide: add more examples of rule language to the explanations of things. Like the 3 refer by reference examples are ok but do not suit my needs really. (And I know one of them came from one of MY rules). I have a many new folks writing rules and they are not using the document to write rules. I am using it to point out things to them and telling them where they can find the things I tell them why it should be written a different way.

I am not sure my folks aren't using it because the document is too cumbersome to use (it is lengthy) or if it is because they can't find what they need or if it is because there are not enough examples. But when I have gone to the document to help them out and direct them to how to write rules, I find it not easy to find things in the document and the explanations are lengthy, and there are not enough examples of how to write the text. Example, referring to a statute in the rule, do you say "in accordance to" "pursuant to" or how to you actually say it? The document does say you should refer to the GS but it doesn't say how to word it.

Just my 2 cents.

Thank you!

Nadine Pfeiffer
Rules Review Manager
Division of Health Service Regulation
NC Department of Health and Human Services

From: Clint Pinyan <CPINYAN@brookspierce.com>
Sent: Friday, January 8, 2021 12:07 PM
To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>
Cc: Reeder, Amanda J <amanda.reeder@oah.nc.gov>
Subject: [External] FW: [Rulers] RRC Style Guide Comments

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Amanda reminded of my prior comments, only the second of which is substantial:

1. The formatting of the table of contents is whack. With respect to the Chapter headings, some are all caps, some have the word "Chapter" in initial case but the rest in all caps, Chapter 4 is initial caps in its entirety, etc. Need to make it consistent. And the lack of line space and the extra tab before "Chapter 15" are both disconcerting.

2. Page 27 says that “can” is a word to avoid. But Page 28 says that “can” is a preferred word. As I asked at the time: “Well can I can? Or can I can’t can?” You may want to scrub that list down to make sure there are no other words that are both discouraged and encouraged.

Clint Pinyan

From: Reagan, Walker <Walker.Reagan@abc.nc.gov>
Sent: Wednesday, January 6, 2021 5:48 PM
To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>
Subject: RE: RRC Style Guide Comments

I have reread and reviewed the Style Guide again today. I have found this document very helpful and a good, quick way to find the answer to questions I may only deal with one every year or so.

I do not have any suggestions for changes or improvements. Thanks.

From: Seavers, Dennis <dennis.seavers@nc.gov>
Sent: Wednesday, December 2, 2020 10:47 AM
To: Snyder, Ashley B <ashley.snyder@oah.nc.gov>
Subject: RE: RRC Style Guide Comments

Hi, Ashley,

The Style Guide is great and I refer it often when drafting rules.

I worked on the group that review the guide before it was published, and I do wish that we had gone with a structure that Carrie Ruhlman and Wildlife had proposed. Gerry Cohen didn’t take that approach, but I still think it’s very useful in its current form. I wouldn’t ask that it be restructured if everyone is finding it helpful.

Thanks for reaching out to get comments on it.

Dennis

Dennis Seavers
Executive Director
North Carolina Board of Barber Examiners