

CSI - Ohio

The Common Sense Initiative

MEMORANDUM

TO: Jeffrey M. Rosa, Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board

FROM: Meredith Rockwell, Regulatory Policy Advocate

DATE: March 23, 2012

RE: **CSI Review – Occupational Therapy Five-Year Review**
(OAC 4755-3-02; 4755-3-03; 4755-3-04; 4755-3-07; 4755-3-08; 4755-3-09;
4755-3-10; 4755-3-13; 4755-3-14)

On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

Analysis

The rules in this package specify procedures for occupational therapy licensure. The package consists of rules up for five-year review that do not contain changes. Generally, the BIA is complete and the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board adequately answered all of the questions. The only public comment received suggested a time extension for the period within which a licensee must update the Board of a change in address. As the Board explains in the BIA, this request could not be accommodated because of operational issues. In a follow-up telephone conversation, the Board explained that the mail it sends is not forwarded, and when a change of address occurs, the mail is returned to the Board and the Board must resend the mail. This creates significant delays in licensees receiving mail from the Board, and time can be critical when the mailing contains a renewal notice or something similar.

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Finally, the ability to adjust the rules in this package is limited by the ORC. Additionally, since the Board uses a national examination for applicants, there is limited flexibility for changing the format of that exam. The ORC creates the adverse impact to the licensees, and that impact cannot be mitigated by rule.

Recommendations

For the reasons explained above this office does not have any recommendations regarding this rule change.

Conclusion

Based on the above comments, the CSI Office concludes that the Board should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.

cc: Mark Hamlin, Lt. Governor's Office