

**MEMORANDUM**

**TO:** Pam Watkins, Ohio Department of Public Safety

**FROM:** Paula Steele, Regulatory Policy Advocate

**DATE:** September 20, 2013

**RE:** **CSI Review – Fire Service Training Programs** (OAC 4765-20-01 through 4765-20-23)

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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 Ohio Department of Public Safety's rule package consists of twenty-three proposed rules – twenty-two are existing rules being reviewed and amended, and one rule is being rescinded under the five-year review requirement of ORC 119.032. The proposed rules address certifications for firefighters or fire safety inspectors. The draft rules were submitted to the CSI Office on June 13, 2013 with a public comment period ending on June 27, 2013. During that period, no public comments were submitted.

The proposed amended rules articulate qualification and examination requirements for the issuance, renewal, and reinstatement of certifications, certification cycles, and reciprocity certification requirements for firefighters or fire safety inspectors. In addition, the proposed rules address continuing education (CE) requirements and CE exemption parameters. Requirements included in the rescinded rule, 4765-20-12 Equivalency for Fire Instructor, have been relocated to OAC Chapter 4765-21 which addresses fire instructor certifications. The intent of the rules is to ensure well-trained firefighters and fire safety inspectors, resulting in improved response times and increased safety.

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According to the BIA, the draft rules were developed through a comprehensive early stakeholder outreach process. Stakeholders provided suggestions which were incorporated, or partially incorporated into the proposed rules.

After reviewing the proposed rules and the BIA, the CSI Office determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the rules justifies the adverse impact identified in the BIA.

### **Recommendations**

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

### **Conclusion**

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

cc: Mark Hamlin, Director of Regulatory Policy