



**John Kasich**, Governor  
**Bonnie K. Burman**, Sc.D., Director

## MEMORANDUM of RESPONSE

To: Mark Hamlin, Director of Regulatory Policy, CSI Office and Lt. Gov. Office  
Sydney King, Regulatory Policy Advocate, CSI Office

From: Tom Simmons, Policy Manager

Re: Chapter 173-39 Rules

Date: April 14, 2014, Revised on May 7, 2014.

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Thank you for reviewing ODA's rule proposals Chapter 173-39 of the Administrative Code. Because your office recommended no changes before proceeding, ODA will now proceed with filing the above mentioned rule proposals with JCARR.

Thank you for your work.

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*Revised:* On May 7 ODA revised the filing of rule 173-39-02.4 of the Administrative Code to better comply with the incorporation-by-reference statutes. In doing so, ODA added a date to the two forms that it cited and referenced ODA's website. ODA's analysis of the rule's adverse impact in the BIA will not change as a result of the rule revision because the revision will not alter the rule's adverse impact.