

**MEMORANDUM**

TO: Mark Levy, State Board of Orthotics, Prosthetics and Pedorthics

FROM: Paula Steele, Regulatory Policy Advocate

DATE: March 3, 2014

RE: **CSI Review – Military/Veterans Occupational Licensing Accommodations** (OAC 4779-5-05; 4779-8-01; and 4779-9-04)

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

This State Board of Orthotics, Prosthetics and Pedorthics (Board) rule package consists of three draft rules – two new and one amended rule – being proposed under the five-year review requirements of ORC 119.032. The rule package was submitted to the CSI Office on February 10, 2014, and the comment period for the rule closed on February 20, 2014. No public comments were received during the comment period.

The draft rules implement the recently-enacted House Bill (HB) 98 which requires occupational licensing agencies to adopt rules identifying substantial military equivalents for their licensing education and experience requirements. The two new proposed rules address the Board's efforts and findings in identifying military programs of training, military primary specialties, and lengths of service that are substantially equivalent to or exceed the Board's requirements for licensure, and extend the continuing education reporting period for licensees engaged in active military service. The amended rule, 4779-8-01 Renewal of License, adds a waiver of late fees for military veterans or their spouses who were engaged in active duty when the license expired. Other

amendments include updates which enable the licensee to more easily update his or her license such as allowing for electronic submission of renewal applications.

According to the BIA, the Board's early stakeholder outreach process resulted in no suggested changes for the proposed rules.

After reviewing the proposed rules and BIA, the CSI Office has determined that the rule package satisfactorily meets 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 described above, the CSI Office has no recommendations regarding this rule package.

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