

**MEMORANDUM**

TO: Gregg Thornton, Ohio Board of Speech-Language Pathology and Audiology

FROM: Sophia Papadimos, Regulatory Policy Assistant

DATE: September 23, 2014

RE: **CSI Review – Five Year Rule Review 2014 (OAC 4753-1-04, 4753-3-01, 4753-3-08, 4753-8-04)**

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 rule package consists of four no-change rules being proposed by the Ohio Board of Speech-Language Pathology and Audiology pursuant to the five-year rule review as required by O.R.C. 119.032. The rule package was submitted to the CSI Office on August 26, 2014 and the comment period was held open until September 19, 2014. No comments were received during this time.

Ohio Administrative Code (OAC) 4753-3-01 outlines the application process for licensure, including all relevant documents that must be submitted to the Board. OAC 4753-3-08 specifies the grounds under which the Board may pursue disciplinary action and impose sanctions for violations. OAC 4753-08-04 requires an audiologist to furnish each person supplied with a hearing aid receipt, along with a thirty-day return policy. OAC 4753-1-04 pertains to personal information systems; the CSI Office determined this rule does not have an adverse impact to business.

During the preliminary stakeholder outreach, no opposition to the rules was expressed. The adverse impact described in the BIA includes the time to fill out the application. In the event of a violation of the ORC or OAC, a licensee could have his or her license suspended or revoked, constituting an adverse impact. Lastly, the time necessary for a business to include specific verbiage on a sales receipt is an adverse impact. However, this rule is required by ORC 1345.30.

After reviewing the rules and associated BIA, the CSI Office has determined the purpose of the rules is justified.

Recommendation

For the reasons explained above this office does not have any 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.