

**MEMORANDUM**

TO: Mindy Franks, Ohio State Dental Board

FROM: Emily Kaylor, Regulatory Policy Advocate

DATE: May 5, 2016

RE: **CSI Review – 2015 Chapter Five (OAC 4715-5-01.1, 4715-5-02, 4715-5-03, and 4715-5-08)**

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 proposed rule package consists of four rules (one no-change and three amended) being reviewed by the Ohio State Dental Board pursuant to the five-year review requirement in statute. The rule package was submitted to the CSI Office with 18 other proposed Dental Board packages on December 8, 2015 and the comment period was held open through January 4, 2016. No comments were received during this time.

The proposed rules outline the minimum standards for examination scores for licensure exams and the minimum requirements for licensure. Additionally, the rules explain denture identification requirements and written work authorizations. The amendments correct for gender neutralizations, clarify prescribing dentist's signature requirements, define removable prosthesis, and incorporate requirements of House Bill 463 from the 130th General Assembly. As a result of House Bill 463, an alternative path to licensure was established through a dental residency program.

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The adverse impacts created in this rule package are associated with the time and cost of applying for initial licensure. The Board's Law and Rules Review Committee approved of the submitted rules. Stakeholders were notified of the rules through the Board's website or via email. No comments were received that the cost is overly burdensome. Therefore, after reviewing the proposed rule package, the CSI Office has determined the purpose of the rules is justified.

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 State Dental Board should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.