

**MEMORANDUM**

**TO:** Deborah Veley, Executive Director, Board of Executives of Long-Term Services & Supports

**FROM:** Sydney King, Regulatory Policy Advocate

**DATE:** July 5, 2016

**RE:** **CSI Review – Licenses and Registration (OAC 4751-1-10)**

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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 Board of Executives of Long-Term Services & Supports (BELTSS) submitted a rule package to the CSI Office for review consisting of one amended rule. The rule package was filed with the CSI Office on April 5, 2016, and the comment period for the rules closed on May 9, 2016.

Rule 4751-1-10 establishes the licensing and registration process for nursing home administrators. The rule requires passing an examination, submitting documentation and fees, and completing continuing education. The rule also describes the requirements for issuing the certificate of registration and displaying the certificate at the licensee's place of employment. The amendment to the rule allows BELTSS to issue the certificate of registration by electronic means. The Board engaged stakeholders by requesting all three of the primary provider associations (LeadingAge Ohio, The Ohio Health Care Association, and the Academy of Senior Health Services) place a notice in their newsletters to solicit feedback. The BIA indicates that the feedback from stakeholders regarding the amendment was positive.

The BIA cites licensees as the impacted business community. Because the rule was not filed as a five year rule review, BELTSS is only required to analyze the impact of the regulation's amendments. BELTSS anticipates the amendment's potential impact is to individual licensees

without access to a computer. This may require the individual to call BELTSS to request alternative options or seek access to a computer at a public library. BELTSS states the amendment is necessary to adapt to technological advances and allow for easier access to documents on the website.

### **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.

cc: Mark Hamlin, Lt. Governor's Office