



## MEMORANDUM

**TO:** Mindy Franks, Ohio State Dental Board

**FROM:** Emily Kaylor, Regulatory Policy Advocate

**DATE:** April 12, 2016

**RE:** **CSI Review – 2015 Chapter 19 (OAC 4715-19-01, 4715-19-02, 4715-19-03, 4715-19-04, and 4715-19-05)**

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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 proposed rule package consists of three no-change and two amended rules 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, along 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 BIA states that dentistry personnel are impacted by this set of rules. However, the rules are related to employees of the Board accessing the Board's confidential personal information system and ensuring that there is a valid reason for access and authentication measures are in place for the system. This access and the rules associated with it are internal procedures with no adverse impact on the business community. Accordingly, the rule does not have any adverse impact for CSI review.

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77 South High Street | 30th Floor | Columbus, Ohio 43215-6117  
[CSIOhio@governor.ohio.gov](mailto:CSIOhio@governor.ohio.gov)

**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.