

**MEMORANDUM**

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

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

**DATE:** August 26, 2016

**RE:** **CSI Review – Online Processing (OAC 4779-5-03, 4779-6-01, 4779-8-01, and 4779-12-01)**

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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**

This State Board of Orthotics, Prosthetics, and Pedorthics (Board) rule package consists of four amended rules proposed pursuant to the five-year review requirement in statute. The rule package was sent to stakeholders on June 22, 2016 and the public comment period closed on July 15, 2016. No comments were received during this time. The Board sent the rule package to CSI on July 25, 2016.

The rules lay out the process for license applications to the Board, temporary license applications, license renewals, and fees. The amendments update language to coincide with moving to an online license application processing system (e-licensing), while also providing for a form on the Board's website that can be downloaded and mailed in for cases when someone cannot use the e-licensing system.

The adverse impacts associated with these rules are the time it takes to complete application for licensure, temporary licensure, or renewal. These applications consist of the time it takes to

properly fill them out in the e-licensing platform in addition to continuing education requirements and procuring documentation to support one's application materials. Applications and supporting documentation are necessary to ensure that qualified individuals are licensed by the Board. Additionally OAC 4779-12-01 details the fees associated with licensure, exams, replacement license cards and certificates, and fines for violations.

According to the BIA, the Board presented the rules and e-licensing platform at the Ohio Orthotics and Prosthetics Association spring 2016 meeting. No comments were received at this presentation or during the CSI comment period. Therefore, after reviewing the proposed rules and associated BIA, the CSI Office has determined the purpose of the rules is justified.

### **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 State Board of Orthotics, Prosthetics, and Pedorthics 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