

**MEMORANDUM**

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

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

**DATE:** November 30, 2016

**RE:** **CSI Review – Timely Renewal and Fees (OAC 4751-1-16 and 4751-1-10.1)**

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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 two amended rules. The notification included two BIAs addressing each rule but the CSI Office combined the BIAs for review purposes and the recommendation reflects this. The rule package was filed with the CSI Office on October 17, 2016, and the comment period for the rules closed on November 15, 2016. No comments were received.

Rule 4751-1-16 establishes the Board's fees for the various licensing applications. The rule is amended to allow for electronic submission of the fee and to remove a licensing fee that has not been collected by the Board in years. Rule 4751-1-10.1 establishes the standards for submitting a timely renewal of an individual's license. The rule is amended to allow individuals to renew their licenses online.

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 amendment. BELTSS anticipates the amendment's potential impact is to individual licensees without access to a computer. This may require the individual to submit the renewals via the mail

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