

**MEMORANDUM**

TO: Kaye Norton, Ohio Department of Health

FROM: Chris Smyke, Executive Assistant

DATE: February 2, 2017

RE: **CSI Review – Manufactured Home Parks (OAC 3701-27)**

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This rule package consists of 37 rescinded rules proposed by the Ohio Department of Health (ODH). The rule package was submitted to the CSI Office on November 23, 2016 and the public comment period was held open through December 23, 2016. No comments were received during that time.

Ohio Administrative Code (OAC) 3701-27 governs the licensing and inspection of manufactured homes. ODH is proposing to rescind this entire chapter because legislation enacted in 2012 moved the authority to regulate manufactured homes to the Ohio Manufactured Homes Commission. As a result, the applicable regulation is currently codified under OAC 4781-12 and this rescission is proposed to bring state regulation in line with the statute.

After reviewing the proposed rule package and the BIA, the CSI Office has determined that the rule satisfactorily meets the standards espoused by the CSI Office, and the proposed rescissions are justified.

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 Ohio Department of Health should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.