

**MEMORANDUM**

TO: Greg Thornton, Ohio Board of Speech-Language Pathology and Audiology

FROM: Danielle Dillard, Regulatory Policy Advocate

DATE: September 17, 2018

RE: **CSI Review – CE Credit for Volunteer Practice (OAC 4747-1-11)**

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 one amended rule submitted by the Ohio Board of Speech-Language Pathology and Audiology (Board). The rule package was submitted to the CSI Office on August 14, 2018 and the public comment period was held open through August 28, 2018. No comments were received during this time.

The amended rule pertains to continuing education standards for licensed hearing aid fitters who practice under ORC and Ohio Administrative Code (OAC) Chapter 4747. The rule outlines the number of continuing education hours to be completed during each practice period, and the continuing education requirements necessary for license renewal. The rule is being amended to permit continuing education credit for providing services as a volunteer to uninsured and indigent persons. The amendment is required by statute. The Board will accept credits completed during the current 2017-2018 practice period.

As part of early stakeholder outreach, the Board distributed the proposed rule to the Hearing Healthcare Alliance of Ohio, which is the state association for hearing aid specialists. It also

posted the rule to its website. No input was received from stakeholders or licensees about the content of the amendments. No comments were received during the CSI public comment period.

The rule impacts 412 licensed hearing aid specialists required to complete continuing education under this provision. Specialists must complete 10 hours of continuing education in order to maintain licensure in the state. The proposed amendment does not have an adverse impact because it expands the way that a licensee may obtain continuing education credit. If a licensee does not comply with the continuing education requirements in the rule, they may be subject to discipline in the form of an administrative hearing before the Board. The Board notes that requiring licensees to maintain continuing education standards protects the public and the profession because it ensures professional competence of hearing aid specialists.

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 Board of Speech-Language Pathology and Audiology should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.