



## Common Sense Initiative

**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor

**Carrie Kuruc**, Director

### MEMORANDUM

**TO:** Theresa Stir, Ohio Veterinary Medical Licensing Board

**FROM:** Paula Steele, Common Sense Initiative Office

**DATE:** February 28, 2019

**RE:** **CSI Review** – 2019 No-change Rules (OAC 4741-1-01, 4741-1-03, 4741-1-04, 4741-1-08, 4741-1-10, 4741-1-13, 4741-1-14, 4741-1-16, 4741-1-17, 4741-1-18, 4741-1-20, 4741-1-23, 4741-2-02, 4741-2-03, 4741-2-04, 4741-3-01, 4741-3-02, 4741-3-03, 4741-3-04, 4741-4-01, 4741-4-02, 4741-4-03, and 4741-4-05)

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On behalf of Lt. Governor Jon Husted, 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 Ohio Veterinary Medical Licensing Board (Board) submitted a rule package containing twenty-three (23) no-change rules under the five-year review process required by statute. The rule package was filed with the CSI Office on January 9, 2019, and the comment period for the rules closed on January 30, 2019. No comments were received during that time.

The proposed rules stem from four chapters in the Ohio Administrative Code: Chapter 4741 – 1 – General Provisions, 4741-2 – Veterinary Business Facilities, 4741-3 – Veterinary Student Loan Repayment Program and 4741-4 – Assessing Confidential Personal Information.

Of the proposed rules within the four chapters, CSI assessed that only Chapters 4741-1 and 4741 – 2 contained adverse impacts to business. Chapter 4741-3 concerns a voluntary program for veterinarians and 4741-4 concerns internal board controls.

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According to the BIA, the Board placed a notification on the Board's website indicating the rules were up for review. In addition, a November 2018 newsletter sent out to members stated the rules were being reviewed. The Ohio Veterinary Medical Association (OMVA) was involved in the review and amendment of the rule. According to the BIA, no stakeholders provided input on the proposed no-change rules.

The proposed Chapters 1 and 2 draft rules broadly contain standards of care and licensure requirements. The BIA identifies the adverse impact created in the rules as potential disciplinary action for noncompliance and fees for licensure which are prescribed in statute.

### **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 Board should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.