



## 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 27, 2019

**RE:** **CSI Review** – 2019 Amended Rules (OAC 4741-1-11; 4741-3-05; and 4741-4-04)

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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 three (3) amended rules addressing continuing education (CE), selection criteria for student loan applicants and updated language for internal access to personal information confidentiality rule.<sup>1</sup> Two rules, 4741-3-05 and 4741-4-04, are being submitted 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.

Of the three proposed rules, only 4741-1-11 contains adverse impacts to business that are subject to review.

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<sup>1</sup> The CPI rule is an internal regulation for the Board and its employees, providing the policies for accessing confidential personal information. Because the rule is an internal regulation, the CSI Office did not consider it in the review.

The draft rule, OAC 4741-1-11, prescribes the form and content of continuing education (CE) for veterinarians and veterinary technicians. Terminology changes within the rule such as, “scientific programs” to “medical programs,” constitute the majority of changes. In addition, while the overall limit of six hours of online courses remained the same, the Board made the course content more flexible by removing a restriction on online CE hours for practice management/profession.

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 rules were being reviewed. The Ohio Veterinary Medical Association (OVMA) was involved in the review and amendment of the rule. According to the BIA, no stakeholders other than the OVMA provided input on the proposed CE rule.

The BIA acknowledges the adverse impact of time and potential cost of fulfilling CE requirements. However, the CE hour requirements 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 OVMLB should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.