



Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Carrie Kuruc, Director

MEMORANDUM

TO: Gregg Thornton, Ohio Speech and Hearing Professionals Board

FROM: Ethan Wittkorn, Regulatory Policy Advocate

DATE: May 7, 2019

RE: CSI Review – BIA- New Rules- SHP 2019 (4744-1-01, 4744-1-02, 4744-1-03, 4744-1-04, 4747-1-22, 4747-1-23)

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

This Ohio Speech and Hearing Professionals Board (Board) rule package consists of 6 new rules. This rule package was submitted to the CSI Office on April 5, 2019, and the public comment period was open through April 19, 2019.

The rules cover the procedure for adoption of rules, methods of determining meeting details, personal information systems, officer and staff duties, fees, and the code of ethics. Rules from OAC Chapter 4744 are new versions of rescinded rules cited in OAC Chapter 4747 of the recently abolished Ohio Board of Speech-Language Pathology and Audiology and Ohio Hearing Aid Dealers and Fitters Licensing Board.

As part of its early stakeholder outreach, the Board notified all licensees and interested parties of the proposed rules, and the interested parties contacted included several national and state associations. Revisions were made to rules regarding the code of ethics due to input of the American Speech-Language-Hearing Association and the Hearing Healthcare Alliance of Ohio. No comments were submitted during the CSI public comment period.

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The effected community of these rules is over 10,000 licensees including audiologists, hearing aid dealers and fitters, speech language pathologists, and conditional speech language pathologists. According to the Board, the only adverse impact arises from rules 4747-1-22, and 4747-1-23. Rule 4747-1-22 covers fees for licensure, including \$200 application fee for hearing aid dealers, \$262 for hearing aid fitters license application, both incurring a \$120 fee for biennial license renewal, and \$150 fee for first and send trainee permits. Rule 4747-1-23 covers the Boards code of ethics, which is expected to have an impact based on potential costs and time commitments to comply with ethics continuing educations programs. ORC sections 4747.04, 4747.06, 4747.10 allow for the fees listed, and OAC 4747-1-11 outlines continuing education requirements.

Recommendations

Based on the information above, the CSI Office has no recommendations on this rule package.

Conclusion

The CSI Office concludes that the Board should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.