



Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Carrie Kuruc, Director

MEMORANDUM

TO: Missy Anthony, Occupational Therapy, Physical Therapy, and Athletic Trainers Board

FROM: Ethan Wittkorn, Regulatory Policy Advocate

DATE: March 18, 2019

RE: **CSI Review – Athletic Trainers Five Year Rule Review (OAC 4755-43-01, 4755-43-02, 4755-43-04, 4755-43-08, 4755—43-10, 4755-43-11, 4755-43-12, 4755-44-01, 4755-44-02, 4755-47-01, 4755-47-02, 4755-47-03, 4755-47-04, 4755-47-05, 4755-47-06)**

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 Occupational Therapy, Physical Therapy, and Athletic Trainers Board ("Board") rule package consists of 15 rules submitted for review (six with no changes, and nine with amendments). These rules were submitted to the CSI Office on December 14, 2018 and the public comment period was open through December 26, 2018.

The rules pertain to the licensing process for Athletic Trainers and the eLicense system and are under statutory five-year review. The proposed amendments change language regarding submission of an application for a license to reflect a new electronic system and update the name listed to the licensing boards legal name (National Athletic Trainers Association Board of Certification, Inc.)

During the early stakeholder outreach period, the board received one comment regarding the naming of the certification body, and the Board added the body's legal name. OTPTAT posted the draft rules for public comment and notified to all license holders and interested parties via e-mail. In addition,

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the proposed rules were discussed at an OTPTAT public meeting. During the CSI public comment period, two responses were received, but led to no additional changes. One expressed concern over the certification board's name change, but the change correctly reflects the certification board's legal name. The second concern asked that guidelines for license reinstatement be listed in rule 4755-43-10, that some clarification be offered regarding the display of a current license. The Board addressed both concerns with, but for the sake of consistency of the various licenses issued, that the Board did not change the original language.

The rule package under review will impact the business community that employs holders of an Athletic Training License, and the holders of a license. This impact will be seen in the form of licensing fees paid by either the license holder or the licensee's employer. Fees are required for licensure to facilitate the support of agency function, as well as to ensure the enforcement of appropriate requirements that protect the health and safety of Ohioans. The proposed rule package will not affect the current fee structure for Athletic Training Licensure. The listed fees are a \$100 Examination Application, \$100 Endorsement Application, \$100 Reinstatement Application, \$70 Renewal, \$15 License Verification, and \$10 duplicate certificate.

Recommendation

Based on the information above, the CSI office does not have any recommendations for this rule package.

Conclusion

The CSI office concludes that the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board should proceed in filing this rule package with the Joint Committee on Agency Rule Review.