



## 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 (4747-1-11, 4747-1-12, 4747-1-13, 4747-1-15, 4747-1-17, 4753-2-01, 4753-3-01, 4753-3-03, 4753-3-10, 4753-5-01, 4753-9-0)

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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

This Ohio Speech and Hearing Professionals Board (Board) rule package consists of 11 amended 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 renewal procedures, license application and maintenance, revocation of licenses and permits, fraud, telehealth communication, fees, and ethics. Specific amendments to the rules include an increase in required Continuing Education from 10 hours to 20 hours, the discontinuance of a \$16 fee for a wall certificate, the addition of continuing education audits and expired license requirements, changes in the rules for duplicate certificates, specific requirements for sales receipts, general updates and reference updates, and a decrease in the fee for licensure renewal from \$150-\$120.

During the early stakeholder outreach period, the Board notified all licensees and interested parties of the proposed rules and requested comments. The notification was also sent to industry associations, including the American Speech-Language Hearing Association (ASHA), the Ohio

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Speech and Hearing Governmental Affairs Coalition (GAC), and the Hearing Healthcare Alliance of Ohio (HHAO). The ASHA and HHAO both submitted input on the proposed code of ethics rule, which the Board used to revise the proposed rule during the drafting phase. No comments were submitted during the CSI public comment period.

This rule package impacts over 10,000 people licensed and permitted by the Board. Impacts on those licensees include continuing education requirements (increased from 10 hours to 20 hours.), a late fee for license renewal of \$120 (down from \$150), \$200 fee for speech language pathologist or audiologist licensure, biennial renewal fee for speech language pathologist and audiology(\$120 for one, \$175 for those licensed for both), \$25 biennial fee for inactive license, \$50 fee for a student permit, a \$120 fee to restore an inactive license, and administrative time and cost to comply with additional rules. Fees are pursuant to ORC section 4753.11

The Board justifies the proposed rules as necessary to ensure the competency of practitioners and consumer protection.

### **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.