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Mike DeWine, Governor Kumar Subramanian, DDS, President Harry Kamdar, Executive Director

To: Paula Steele
Director of Special Projects
Office of the Lt. Governor, Jon Husted

From: Harry Kamdar, M.B.A.
Executive Director
Ohio State Dental Board

Subject: Memorandum of Response - Common Sense Initiative (CSI) Review

The Ohio State Dental Board has received notice that the CSI Office has two recommendations for the following rule package:

- 4715-3-01

Response to Recommendations

1. The CSI Office recommended that the Board change the proposed language in rule 4715-3-01(D)(9)(d), (e), and (f) referencing “the Higher learning commission of the north central association of colleges and schools” and replace this language “to reflect the appropriate naming convention of the educational accreditation organization.” The Board will change the proposed language to reflect: “the Higher learning commission (formerly known as the Higher learning commission of the north central association of colleges and schools.)” Because the previous name of the organization is still referenced in other rules as well as section 4715.62(A)(2) of the Ohio Revised Code, this rule must include the “formerly known as” language to ensure no confusion exists regarding which organization is referenced by the rule.
2. The CSI office recommended that the Board change the proposed language in rule 4715-3-01(C)(4) referencing the morphine equivalent dose calculator on the State of Ohio Board of Pharmacy’s website because “the CSI office was not able to open a linked page to the Pharmacy Board’s Morphine Equivalent Dose (MED) calculator.” However, the link provided in the proposed rule appears to function properly. In the “track changes” version of the proposed rule submitted to the CSI Office, the link will properly function once all changes are accepted. If the link is copied or typed manually into a browser window, the

link takes the reader to the proper web page location:

https://www.ohiopmp.gov/MED_Calculator.aspx As such, no change has been made to the proposed rule.

The Ohio State Dental Board reviewed the proposed changes to rule 4715-3-01 during its July Board meeting and will proceed with formal filing of the reviewed rule through the Joint Committee on Agency Rule Review (JCARR).

Should you have any questions concerning this Memorandum of Response to file, please feel free to contact Zach Russell at 614/644-7674.

Sincerely,

OHIO STATE DENTAL BOARD

A handwritten signature in blue ink, appearing to read 'Harry Kamdar', is written over the printed name.

HARRY KAMDAR, M.B.A.

cc: Carrie Kuruc, Director of the Common Sense Initiative