Ohio Department of Aging

Empowering Elders.
Strengthening Communities.

Mike DeWine, Governor
Ursel J. McElroy, Director

MEMORANDUM OF RESPONSE

OLDER AMERICANS ACT: HOMEMAKER + PERSONAL CARE

To: Emily Groseclose, Senior Policy and Business Advocate of the Common Sense Initiative Office

Cc: Carrie Kuruc, Director of the Common Sense Initiative Office

From: Tom Simmons, Policy Development Manager of ODA

Date: November 15, 2019

Thank you for reviewing ODA's proposal to amend rules 173-3-01, 173-3-06.4, 173-3-06.5, and 173-3-07 of the Administrative Code, which will involve rescinding rules 173-3-06.4 and 173-3-06.5 of the Administrative Code and simultaneously replacing them with new rules of the same numbers.

Because CSIO recommended filing the rules with JCARR without requesting further amendments, ODA will now file these rules with JCARR, but in doing so will not use *shall* when referring to requirements outside of these rules and only use *shall* once per requirement. This will not substantively change the rules reviewed by CSIO and will not increase these rules' regulatory restrictions.

Thank you for your work.

246 N. High St. / 1st Fl.
Columbus, OH 43215-2406 U.S.A.
www.aging.ohio.gov

Main: (614) 466-5500
Fax: (614) 466-5741
TTY: Dial 711