



## Common Sense Initiative

**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor

**Sean McCullough**, Director

### MEMORANDUM

**TO:** Gregg Thornton, Speech and Hearing Professionals Board

**FROM:** Ethan Wittkorn, Business Advocate

**DATE:** December 6, 2021

**RE:** CSI Review –Five Year Rule Review Package – No Change (OAC 4753-1-03; 4753-3-02; 4753-3-03; 4753-3-04; 4753-3-05; 4753-3-06; 4753-3-07; 4753-3-09; 4753-3-10; 4753-5-02; 4753-6-01; 4753-7-01; 4753-7-02; 4753-7-03; 4753-10-03; 4753-11-01; 4753-11-02; 4753-11-03; 4753-11-04; and 4753-11-05)

---

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 20 no change rules as part of the statutory five-year rule review requirement. It was submitted to the CSI Office on October 25, 2021, and the public comment period was open through November 11, 2021. Unless otherwise noted below, this recommendation reflects the version of the proposed rule filed with the CSI Office on October 25, 2021.

The proposed rules cover the Boards licensing requirements, eligibility for licensure, confidential records requirements, and license renewal. No amendments have been proposed for any of the rules in this package.

During the early stakeholder outreach period, the Board shared notice of the rule development with all licensees, as well as the American Speech-Language-Hearing Association, the Hearing Healthcare Alliance of Ohio, and the Ohio Speech and Hearing Governmental Affairs Coalition. The

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

[CSIPublicComments@governor.ohio.gov](mailto:CSIPublicComments@governor.ohio.gov)

Board did not receive any input on the rules during either the early stakeholder outreach period, or the CSI public comment period.

Impacted communities of the rules include all licensees of the Board. Potential impacts to licensees include complying with licensure standards, time and costs necessary for license application and renewal, records requirements, and licensing fees ranging from \$50 to \$262 depending on license type. The Board states that the adverse impacts of the proposed rules are justified as they help to ensure that licensed professionals have appropriate training, education, and experience; and are well qualified to perform their duties.

### **Recommendations**

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

### **Conclusion**

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