

# CSI - Ohio

## The Common Sense Initiative

---

### MEMORANDUM

**TO:** Gregg B. Thornton, Ohio Board of Speech-Language Pathology and Audiology

**FROM:** Jeffrey R. Kasler, Regulatory Policy Advocate

**DATE:** April 11, 2012

**RE:** CSI Review – License Renewal Fee

---

On behalf of Lt. Governor Mary Taylor, 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. This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

#### Analysis

There is one rule in this package, and it has been amended.

#### Regulatory intent

Rule 4753:5-01 sets forth the fees assessed by the Ohio Board of Speech –Language Pathology and Audiology (“the Board”) for the issuance of various licenses. The proposed amendment raises the licensure renewal fee from \$100 to \$120 for speech-language pathologists and audiologists; for dual license holders, the fee would increase from \$150 to \$170.

The Board states that a fee increase is necessary to ensure that the Board can fulfill its mission of regulating the practice of speech-language pathology and audiology. At the end of fiscal year 2011, the Board learned that its current revenue would not be sufficient to cover expenditures in fiscal years 2012-13. By raising the renewal fee, the Board suggests that it will collect enough additional revenue to meet forthcoming expenditures.

After reviewing the Business Impact Analysis, the CSI Office contacted the Board and asked for an explanation on what specific expenditures the fee increase might cover. The Board responded that all of its revenue is used for operating expenses, i.e. payroll, rent, equipment and personal

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117  
[CSIOhio@governor.ohio.gov](mailto:CSIOhio@governor.ohio.gov)

services. More specifically, the Board provided examples of expenditures – in particular, DAS-related expenses such as rent, print services, telephones, IT-desktop support, and eLicense – that have increased since 2006 and thus necessitate the need for increased revenue. The Board currently employs 4 individuals – the same number it has employed since 1995.

The Board noted that, in 2004, the renewal fee was \$150. The Board lowered the fee to \$100 in 2006 because it had realized a surplus. So, the proposed amendment would increase the fee \$20 but still keep it below 2004 levels.

#### *Development of the regulation*

The Board explained that it had ongoing conversations with the Ohio Speech and Hearing Governmental Affairs Coalition (GAC). Membership in the GAC comprises roughly 50% of the total number of licensees regulated by the Board. According to the Board, the GAC is aware of the fee increase and had not offered the Board any formal opposition to the increase. No comments were received during the CSI comment period.

#### *Adverse impact*

As of March 2012, there were 6,248 licensed speech-language pathologists and 939 licensed audiologists in Ohio. The Board notes that the adverse impact to licensees or the employers who reimburse them should be minimal, increasing by \$20 per licensee per renewal period (every two years). Again, the Board emphasizes that the proposed increase of \$20 still leaves the fee below 2004 levels (which would have meant a \$50 increase).

#### **Recommendations**

There are no recommended changes to the proposed rule change.

#### **Conclusion**

Based on the above comments, the CSI Office concludes that the Board should proceed with filing this rule package with JCARR.

cc: Mark Hamlin, Lt. Governor's Office