

**MEMORANDUM**

TO: Jeffrey M. Rosa, Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board

FROM: Meredith Rockwell, Regulatory Policy Advocate

DATE: January 22, 2013

RE: **CSI Review – 2013 Occupational Therapist Continuing Education Changes (OAC 4755-9-01)**

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 (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

Analysis

This rule package consists of one amended rule. The rule establishes the continuing education requirements that a licensed occupational therapist and occupational therapy assistant must meet to renew their licenses to practice. The amendment to the proposed rule allows the topic of cultural competence to be part of the continuing education credit earned for the required one hour of ethics education. The Board felt this was relevant education for licensees given the dynamic population of Ohio. The Board initially contemplated adding cultural competence as an independent education requirement, but licensees commented that this requirement would detract from education in more clinically focused areas, so the Board compromised and incorporated the cultural competence education into the ethics requirement.

The rule is also up for five-year review pursuant to ORC 119.032. The unchanged provisions of the rule require licensees to complete 20 hours of continuing education every two years. Licensees may earn education credits through various methods, including publishing written materials on occupational therapy topics, engaging in self-study, or attending live seminars. Overall, the rule outlines 13 different methods by which continuing education credit may be earned.

No comments were received during the comment period with this office. The relevant comments received by the Board during early stakeholder outreach were appropriately addressed, as discussed above.

The adverse impact created by this rule is the time and money involved in completing 20 hours of continuing education every two years. The Board states that this impact is justified, because the Revised Code requires continuing education and the education will assist licensees in maintaining and improving the clinical skills necessary to maintain current competence in the practice of occupational therapy.

Recommendations

For the reasons explained above this office does not have any recommendations regarding this rule package.

Conclusion

Based on the above comments, the CSI Office concludes that the Board should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.

cc: Mark Hamlin, Lt. Governor's Office