

**MEMORANDUM**

TO: Kelly Caudill, Ohio State Chiropractic Board

FROM: Paula Steele, Regulatory Policy Advocate

DATE: April 3, 2014

RE: **CSI Review – Military Considerations** (OAC 4734-11-01)

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 new draft rule being proposed by the Ohio State Board of Chiropractors. The rule was submitted to the CSI Office on March 19, 2014, and the comment period expired on April 1, 2014. No comments were received during the comment period.

The draft rule implements the recently-enacted House Bill 98 which requires occupational licensing agencies to adopt rules identifying substantial military equivalents for their licensing education and experience requirements. Further, the proposed rule implements recommendations stemming from Executive Order 2013-05K, which are summarized in the Office of Workforce Transformation's *Valuing Ohio Veterans Report* as follows:

The State of Ohio recognizes veterans as a valuable, talented and skilled workforce, and to that end is committed to increasing the number of military service members and veterans living and working in Ohio.

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In June of 2013, Governor John R. Kasich signed Executive Order 2013-05K to support Ohio's veterans by ensuring they are receiving the appropriate credit and credentialing for their military training and experience.

The proposed rule defines military veterans and addresses temporary licensure for individuals whose spouse is on active military duty. The proposed rule also permits the Board to extend chiropractic and acupuncture continuing education reporting periods under certain circumstances, and enables the board consider relevant education, training, or service. Finally the rule addresses applications for chiropractic licensure and acupuncture certificates, and provides for circumstances in which a forfeited license can be reinstated without penalty fees.

After reviewing the proposed rule and BIA, the CSI Office has determined that the rule package satisfactorily meets the standards espoused by the CSI Office, and the purpose of the rules justifies the adverse impact identified in the BIA.

Recommendations

For the reasons described above, the CSI Office has no 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