

**MEMORANDUM**

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

FROM: Sophia Papadimos, Regulatory Policy Assistant

DATE: September 23, 2014

RE: **CSI Review – Military Considerations (OAC 4753-12-01)**

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

The Ohio Board of Speech-Language Pathology and Audiology submitted one new rule in order to implement recently-enacted House Bill 98 which requires each licensing board to adopt rules identifying substantial military equivalents for its licensing, education and experience requirements. The rule was submitted to the CSI Office on August 26, 2014 and the comment period was held open until September 19, 2014. No comments were received during this time.

Ohio Administrative Code (OAC) 4753-12-01 grants the prioritization of application processing for veterans or their spouses. The proposed new rule waives any penalties associated with failing to renew a license if it was not renewed because of the licensee's service in the armed forces. Additionally, continuing education requirement extensions can be granted if a member, veteran, or the spouse or surviving spouse of a member or veteran of the armed forces, has served on active duty for a period in excess of thirty-one days. Lastly, the Board will consider military education, training, and experience that may assist an applicant in qualifying for licensure.

The BIA explains the adverse impact as the time and effort required to complete and submit the

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application and the associated fees. Also, it identifies the time and cost required to comply with any continuing education requirements for renewal of respective licenses. However, the purpose of this proposed rule is to reduce these adverse impacts by recognizing equivalent education and experience gained in the military which would offset some of the requirements of the standard licensing process.

While the proposed rule implements House Bill 98, it also captures the intent of the 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.

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.

After reviewing the proposed rule and BIA, the CSI Office has determined that the purpose of the rule is justified.

Recommendation

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.