



MEMORANDUM

TO: John Ware, Executive Director, Ohio State Board of Career Colleges and Schools

FROM: Sophia Papadimos, Regulatory Policy Advocate

DATE: August 18, 2015

RE: **CSI Review – 2014-2015 Rule Review Process (OAC 3332-1-01, 3332-1-04.5, 3332-1-09, 3332-1-10, 3332-1-11, 3332-1-12, 3332-1-12.1, 3332-1-14, 3332-1-18, 3332-1-19, 3332-1-20, 3332-1-22, 3332-1-22.1)**

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 thirteen amended rules being proposed by the Ohio State Board of Career Colleges and Schools pursuant to the five-year review requirement in statute. The rule package was submitted to the CSI Office on June 23, 2015 and the comment period was held open until July 31, 2015. No comments were received during this time.

The proposed rules outline the Board's ability to limit, suspend, revoke or deny a certificate of registration for a school. The draft rules also outline the necessary policies schools must have regarding enrollment procedures. Permitted advertising and publicity policies are also explained in this package. Fees, scholarships, and institution grants are also addressed in the draft rules.

The Board worked with stakeholders to secure input for the five-year rule review, in the form of a rule review committee. Aside from Board staff, representatives from registered schools served on the committee. Several of the amendments are to correct grammar errors and provide clarification. The fee structure for a certificate of registration has been altered. A school with gross annual tuition between \$100,000 and \$999,999 pays an initial fee of \$250 and a renewal fee

of \$500. Previously, schools that had gross annual tuition between \$500,000 and \$999,999 paid an initial fee of \$400 and a renewal fee of \$800. A school with gross annual tuition over \$1,000,000 is required to pay an initial fee of \$800 and a renewal fee of \$1,600. Previously, schools with gross annual tuition over \$1,000,000 but less than \$2,000,000 were subject to a \$600 initial fee and a \$1,200 renewal fee. However, schools with gross annual tuition over \$2,000,000 were always subject to pay an initial fee of \$800 and a renewal fee of \$1,600. Additional adverse impacts are penalties for non-compliance, other miscellaneous fees, and the time required to develop the appropriate policies.

Stakeholders were included in the rule-making process and no comments were received that the requirements are overly burdensome. Therefore, after reviewing the proposed rules and associated BIA, the CSI Office has determined the purpose of the rules is justified.

Recommendations

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

Conclusion

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