

**MEMORANDUM**

TO: Christopher Logsdon, The Ohio Board of Cosmetology

FROM: Sydney King, Regulatory Policy Advocate

DATE: September 20, 2016

RE: **CSI Review- Chapter 1, Chapter 3, Chapter 5, Chapter 7, Chapter 11, Chapter 13, and Chapter 21**

Analysis

The CSI Office issued recommendations for Chapter 1 on April 18, 2016 and Chapters 3, 5, 7, 11, 13, and 21 on May 27, 2016 to the Ohio Board of Cosmetology. As a result of legislative changes that occurred after the CSI Office issued the recommendations and before completing the Joint Committee on Agency Rule Review process, the Board made several amendments to the rule language. The Board states the amendments are only to comply with the legislative changes and it is necessary to amend the rules now in order to implement the changes in the cosmetology laws. Because the amendments potentially increase the adverse impacts to the business community, the Board reached out to stakeholders seeking input about the amendments and provided that feedback in a memo to CSI on August 30, 2016. The Board made changes to the rules based on suggestions from the stakeholders. However, the majority of the 27 comments received addressed the recent legislation. Because the comments focused on the statutory language and it is necessary for the Board to amend the rules in order to comply with the law, the CSI Office does not have any recommendations regarding the amendments that include adverse impacts.

cc: Mark Hamlin, Lt. Governor's Office

MEMORANDUM

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TO: Christopher Logsdon, Ohio State Board of Cosmetology

FROM: Sydney King, Regulatory Policy Advocate

DATE: May 27, 2016

RE: **CSI Review – Chapter 21 (OAC 4713-21-01, 4713-21-03, 4713-21-04, and 4713-21-06)**

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This rule package consists of one rescinded and three amended rules being submitted by the Ohio State Board of Cosmetology. The rule package was filed with the CSI Office on December 24, 2015 and the comment period for the rules closed on January 15, 2016.

The rule package provides the requirements for continuing education, licensure renewal procedures, and applying for inactive licensure status and temporary work permits. According to the BIA, the Board reached out to all licensed entities, schools, local associations, and societies representing the branches of cosmetology regulated by the Board for input. Additionally, no comments were received during the CSI public comment period to indicate the impacted business community had concerns with the rule package. The CSI Office met with the Board on March 22 to discuss several rule packages that were submitted in December. In this meeting, the Board provided additional information on the rule package and subsequently submitted a revised BIA on April 7, 2016.

The BIA details the costs of compliance, including fees for continuing education and the completion of applications. The Board states that the rule package is necessary to ensure licensees are receiving continuous education and managing the status of licenses.

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.

cc: Mark Hamlin, Lt. Governor's Office