

**MEMORANDUM**

**TO:** Tom Simmons, Ohio Department of Aging

**FROM:** Emily Kaylor, Director of Regulatory Policy

**DATE:** June 28, 2017

**RE:** **CSI Review – Homemaker Services (OAC 173-39-02.8)**

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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 submitted by the Ohio Department of Aging (ODA). The rule package was submitted to the CSI Office on April 18, 2017 and the public comment period was held open through April 30. Two public comments were received during this time. A revised BIA was sent on May 12 and a final version of the rule on June 7.

This rule regulates providers when they provide a homemaker service, which includes those services that will enable individuals to maintain their quality of life. Homemaker services may include assisting with meal planning and preparation, laundry, managing a personal calendar, and house cleaning. The rule is amended for clarity and to delete duplicative requirements. Additionally, ODA creates new employment opportunities for registered nurses and licensed practical nurses by allowing them to qualify as a homemaker supervisor.

The rule impacts the over 690 providers certified to provide homemaker services. These providers must meet administrative requirements in the rule and hire qualified staff that they train to deliver the services. Some suggestions were received during ODA's early stakeholder outreach to which

they either responded to clarify or made changes to the rules. Two comments were received during the CSI public comment period to which ODA made appropriate changes to the rule.

### **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 Ohio Department of Aging should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.