

**MEMORANDUM**

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

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

**DATE:** October 8, 2018

**RE:** **CSI Review – 2017 Rule Review Process (OAC 3332-1-02, 3332-1-03, 3332-1-04.1, 3332-1-04.2, 3332-1-04.4, 3332-1-05, 3332-1-06, 3332-1-07, 3332-1-09, 3332-1-10, 3332-1-10.1, 3332-1-13, 3332-1-15, 3332-1-22, 3332-1-22.1, 3332-1-23, 3332-1-24, 3332-1-27, 3332-1-28, 3332-1-29, 3332-1-30, and 3332-1-31)**

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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This rule package consists of one rescinded, fifteen no-change, and six amended rules being proposed by the Ohio State Board of Career Colleges and Schools pursuant to the five-year review requirement in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 October 24, 2017 and the comment period was held open until November 30.

The proposed rules address a variety of issues pertaining to the registration and approval of career colleges and schools. Amendments are being made to six rules to re-organize for clarity, fix grammatical errors, make changes from paper to online submissions of materials, and to comply with changes to state and federal law and regulations.

The Board established a rule review committee consisting of Board staff and representatives from registered schools in order to review recommended changes and propose additional revisions. The committee's recommendations in addition to state and federal changes are the basis for the submitted rule package. No comments were received during CSI review.

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There are approximately 250 registered career colleges and schools under the Board's jurisdiction. The BIA explains some adverse impacts related to fees, applications, and online school disclosure requirement, estimated at \$25 per student. The adverse impacts are necessary for the Board to carry out its statutorily-required duties and to ensure uniform, effective operations of the state's career colleges and schools.

### **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.