



Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Carrie Kuruc, Director

MEMORANDUM

TO: Missy Anthony, Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board

FROM: Jacob Ritzenthaler, Regulatory Policy Advocate

DATE: March 16, 2021

RE: **CSI Review – Athletic Trainer Continuing Education (OAC 4755-45-01)**

On behalf of Lt. Governor Jon Husted, 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 Board as provided for in ORC 107.54.

Analysis

This rule package consists of one amended rule proposed by the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board (Board). This rule package was submitted to the CSI Office on February 5, 2021 and the public comment period was held open through February 19, 2021. Unless otherwise noted below, this recommendation reflects the version of the proposed rule filed with the CSI Office on February 5, 2021.

Ohio Administrative Code 4755-45-01 establishes the continuing education requirements for athletic trainers. The rule requires that 25 hours of continuing education be completed for renewal and establishes the types of activities that may be counted towards continuing education credit, including professional workshops, educational courses, and volunteer services. The rule is amended to remove language that requires two hours of continuing education related to evidence-based practice. The Board states that the amendment is made to address a restructuring of continuing education courses offered by the Board of Certification of Athletic Trainers to include evidence-based practice into the entirety of its course offerings.

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During early stakeholder outreach, the Board sent the proposed rule to stakeholders via interested party email. The Board received comments that were generally supportive of the proposed amendments. During the CSI public comment period, the Board received one comment in support of the proposed amendments.

The business community impacted by the rule includes all athletic trainers practicing in Ohio. Adverse impacts include the time and cost of completing continuing education. The Board notes in the BIA that the cost of continuing education can vary based on the source, which can include the provision of volunteer services and paid courses and seminars. The Board states that the rule is necessary to ensure compliance with continuing education statutes and that athletic trainers maintain competence through continuous education.

Recommendations

Based on the information above, the CSI Office has no recommendations on this rule package.

Conclusion

The CSI Office concludes that the Board should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.