



John Kasich, Governor
Bonnie Kantor-Burman, Director

AGENCY MEMORANDUM OF RESPONSE

To: Mark Hamlin, Director of Regulatory Policy, CSI Office, Lt. Governor's Office
Paula Steele, Regulatory Policy Advocate, CSI Office, Lt. Governor's Office

From: Tom Simmons, Policy Manager

Re: Cost Sharing and Voluntary Contributions

Date: May 30, 2013 (Revised, July 1, 2013)

May 30, 2013

Thank you for reviewing ODA's proposed amendments to rule 173-3-07 of the Administrative Code.

Because your office did not make any recommendations, ODA will now proceed with filing the rule with JCARR.

July 1, 2013

On May 30, 2013, ODA filed rule 173-3-07 of the Administrative Code with JCARR. On July 1, 2013, ODA revise-filed the same rule.

This revised memorandum of response should alert the CSI Office that the proposed changes to the rule's language would create no difference in the adverse impact stated in the BIA that the CSI Office already reviewed.

The revisions that ODA made on July 1 fall into three categories:

- **VOLUNTARY CONTRIBUTIONS:** ODA proposes to repeat two federal requirements for providers regarding voluntary contributions. The requirements already exist, so mentioning them in the rules would not create an adverse impact.

50 W. Broad Street / 9th Floor
Columbus, OH 43215-3363 U.S.A.
www.aging.ohio.gov

614-466-5500 (Main)
614-466-5741 (Fax)
DIAL 711 (TTY)

Additionally, the rule would not require anything in excess of the federal requirements. This would have the effect of unburying the federal requirements.

- **COST SHARING:** ODA would move the examples of services subject to cost sharing from the introductory paragraph to the paragraph under the “cost sharing” subheading.
- **OTHER NON-SUBSTANTIAL:** ODA would make the following revisions to clean up the rule language:
 - Replace the title with “Consumer contributions.”
 - Delete the verbose additions of “consumer” before occurrences of the words “cost-sharing” and “cost sharing.”
 - Make the rule easier to navigate by organizing the paragraphs under the following subheadings: “Introduction,” “Voluntary contributions,” and “Cost sharing.”
 - Insert “of income” after “self-declaration” in paragraph (C)(3)(b) of the rule.
 - Replace “less funds” with “fewer funds” in paragraph (C)(5)(b) of the rule.

Please let us know if you have any questions or recommendations.