



## MEMORANDUM OF RESPONSE

### ODA PROVIDER CERTIFICATION: APPLYING TO BECOME CERTIFIED

To: Carrie Kuruc, Executive Director, CSIO

From: Tom Simmons, Policy Development Manager, ODA

Date: April 12, 2019, revised on July 24, 2019

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Thank you for reviewing ODA's proposal to (1) rescind 173-39-03 and replace it with a new rule of the same number and (2) adopt new rules 173-39-03.1, 173-39-03.2, 173-39-03.3, and 173-39-03.4.

Because CSIO recommended filing the rules with JCARR, ODA will do so today.

Thank you for your work.

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On June 12, 2019, CSI granted ODA permission to make an original filing of 173-39-03.2 immediately after it took effect on July 1, 2019 and to use the same BIA, recommendation from CSIO, and memorandum of response (although revised) for that filing. This allowed the rule to take effect on July 1, 2019, but also allows ODA to make a filing to correct an incorrect cross-reference in the rule as soon as possible after July 1, 2019.

To that end, ODA will now proceed with the original filing of 173-39-03.2.

Thank you for working with ODA in this matter.

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On July 24, 2019, CSI granted ODA permission to make an original filing of 173-39-03 (after it recently took effect on July 1, 2019) and to use the same BIA, recommendation from CSIO, and memorandum of response (although revised) for that filing. On July 24, 2019, ODA became aware that a proposed new rule of another agency to which 173-39-03 references was adopted on July 1 under a different number than by that agency than during the planning stages of rule development between the state agencies. ODA will now proceed with the original filing of 173-39-03 to correct cross-references.

Thank you, again, for working with ODA in this matter.