

CSI - Ohio

The Common Sense Initiative

MEMORANDUM

TO: Jeffrey M. Rosa, Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board

FROM: Meredith Rockwell, Regulatory Policy Advocate

DATE: March 23, 2012

RE: **CSI Review – Athletic Trainers Five-Year Review**
(OAC 4755-40-01; 4755-40-02; 4755-42-02)

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

The rules in this package outline various processes by which the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board provides notice to the public about Board meetings and proposed administrative rule changes. Additionally, the package lists the individuals from whom an athletic trainer may accept a referral. The rules in this package are all five-year review rules that do not contain changes. Generally, the BIA is complete and the Board adequately answered all of the questions.

The public comments received for these rules requested additions to the referral list. As the BIA explains, the rules simply put into practice the requirements created in ORC 4755.60, and changes to the referral list must be made at the ORC level, not the administrative level. It appears that appropriate stakeholder outreach was completed, and that alternative regulations were prohibited by the statutory authority. For these reasons, CSI Ohio will not make any recommendations regarding this package at this time.

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Recommendations

For the reasons explained above this office does not have any recommendations regarding this rule change.

Conclusion

Based on the above comments, the CSI Office concludes that the Board should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.

cc: Mark Hamlin, Lt. Governor's Office