

**MEMORANDUM**

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

FROM: Meredith Rockwell, Regulatory Policy Advocate

DATE: January 22, 2013

RE: **CSI Review – 2013 Athletic Trainers Applications – No Change**
(OAC 4755-43-08; 4755-43-10; 4755-43-11; 4755-44-01)

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 four no-change proposed rules. The rules concern various applications submitted to the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board. The applications allow a licensee to renew a license, to reinstate a denied or revoked license, to obtain approval for an event at which non-Ohio licensed athletic trainers will be providing services, and to change the licensee's name, place of employment, or mailing address with the Board. These rules reiterate or elaborate on requirements otherwise found in the Revised Code.

The Board received no comments relating to these rules during the early stakeholder outreach conducted by the Board. Furthermore, no comments were received during the comment period with this office.

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Primarily these rules require applicants to spend time submitting the applications. There are fees of \$80 and \$100 dollars, respectively, that must accompany the renewal and reinstatement applications. For late renewals, the Board does offer to waive formal disciplinary action and offers instead an informal warning letter. Again, these requirements are primarily specified in the Revised Code, and the Board states this is the justification for the burden created by the rules.

Recommendations

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

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