

**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 Trainer License Eligibility Changes (OAC 4755-43-01; 4755-43-02; 4755-43-04; 4755-44-02)**

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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 amended rules. The rules establish the process to submit an application for licensure (OAC 4755-43-01), establish the exams an applicant must pass for licensure (OAC 4755-43-02), clarify the educational requirements for licensure (OAC 4755-43-04), and require licensees to display wall certificates (OAC 4755-44-02). The Board states that the rules surrounding licensure are necessary to ensure that consumers of athletic training services receive safe and adequate care.

Applicants that graduated prior to 2004 are required to demonstrate that their education covered a specific list of coursework. Applicants were having difficulty with this requirement, so the amended rule proposed in this package (OAC 4755-43-04) changes that requirement to allow an applicant who has practiced for at least five years in another state to obtain a license in Ohio if

they pass the examination and were licensed or certified in good standing for the duration of their practicing years. The other amendments in this package are clarifying in nature, not substantive.

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.

The adverse impact created by these rules consists of completing an application, completing educational requirements prior to application, passing examinations, and displaying wall certificates. The fees associated with these activities, although not contained in these rules, are \$100 for application, the cost of a Bachelor's degree, and either \$300 or \$375 for the examination, depending on date of registration for the exam. The Board's mission is public protection for consumers of athletic training services, and the Board justifies the impact of these rules, because they help ensure the Board only issues licenses to individuals who demonstrate they have the knowledge to safely practice athletic training in Ohio.

### **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