



## Common Sense Initiative

**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor

**Sean McCullough**, Director

### MEMORANDUM

**TO:** Missy Anthony, Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board

**FROM:** Joseph Baker, Business Advocate

**DATE:** March 14, 2022

**RE:** **CSI Review – Physical Therapy – Continuing Education 2022 Revisions (OAC 4755-23-08)**

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On behalf of Lt. Governor Jon Husted, 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 Commission as provided for in ORC 107.54.

#### Analysis

This rule package consists of one amended rule proposed by the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board (Board). This rule package was submitted to the CSI Office on February 10, 2022, and the public comment period was held open through February 21, 2022. Unless otherwise noted below, this recommendation reflects the version of the proposed rule filed with the CSI Office on February 10, 2022.

Ohio Administrative Code 4755-23-08 specifies continuing education responsibilities for individuals licensed as a physical therapist or physical therapist assistant by the Board. Under the rule, physical therapists are required to complete twenty-four hours of continuing education during each two-year renewal cycle, while physical therapist assistants must complete twelve hours. The rule is amended to clearly state that licensees are not required to complete continuing education hours for the first renewal period, and to reduce continuing education requirements for a license reinstated for twelve months or less by half. The rule is also amended to restate a statutory provision that provides ten hours of continuing education credit for published articles or books and to allow for six hours of continuing education for renewing Hand Therapy Certification Commission certification.

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During early stakeholder outreach, the Board shared the proposed rule with license holders via email and discussed the proposed changes at the November 2021 and January 2022 occupational therapy section meetings. The Board received comments supportive of the rules as originally drafted as well as suggestions from stakeholders to incorporate the amended provisions relating to the continuing education credit for Hand Therapy Certification Commission certification renewal and publication credit. No comments were received during the CSI public comment period.

The business community impacted by the rules includes physical therapist assistants and physical therapists, as well as their employers. The adverse impact created by the rules includes the time and costs of completing continuing education courses or alternative methods to receive credit. The Board estimates that the costs of completing continuing education credit likely costs license holders approximately several hundred dollars each year. The Board states that the adverse impact to business is justified to help license holders maintain competency and learn new skills.

### **Recommendations**

Based on the information above, the CSI Office has no recommendations on this rule package.

### **Conclusion**

The CSI Office concludes that the Board should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.