

**MEMORANDUM**

**TO:** Mindy Franks, Ohio State Dental Board

**FROM:** Sophia Papadimos, Regulatory Policy Advocate

**DATE:** April 15, 2016

**RE:** **CSI Review – 2015 Chapter Eight (OAC 4715-8-02, 4715-8-03 and 4715-8-04)**

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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**

The proposed rule package consists of three amended rules being reviewed by the Ohio State Dental Board pursuant to the five-year review requirement in statute. The rule package was submitted to the CSI Office, along with 18 other proposed Dental Board packages, on December 8, 2015 and the comment period was held open through January 4, 2016. No comments were received during this time.

The proposed rules outline continuing education (CE) requirements for license renewal or reinstatement, eligibility criteria for sponsors of continuing education, and standards for biennial sponsors. The draft rules are being amended to update references to the Ohio Revised Code. The proposed rule package requires applicants for biennial license registration or reinstatement to abide by the continuing education requirements in the ORC and maintain records of the CE courses for at least four years after completing the course.

The adverse impacts for CE sponsors include the time to complete an application and pay the

associated fee. Additionally, there are record requirements for sponsors regarding course descriptions, date of course, location of course, and participants involved. Applicants for licensure must complete the required number of continuing education hours and maintain the appropriate records. Lastly, there are penalties for non-compliance. However, no comments were received that the requirements are overly burdensome. Therefore, after reviewing the draft rules and revised BIA, the CSI Office has determined that the purpose of the rules is justified.

### **Recommendations**

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

### **Conclusion**

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