



## Common Sense Initiative

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

**Sean McCullough**, Director

### MEMORANDUM

**TO:** Zachary Russell, Ohio State Dental Board

**FROM:** Ethan Wittkorn, Regulatory Policy Advocate

**DATE:** July 23, 2021

**RE:** CSI Review – Continuing Education Rules (OAC 4715-8-02, 4715-8-03, and 4715-8-04)

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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 Board as provided for in ORC 107.54.

#### Analysis

This Ohio State Dental Board (Board) rule package consists of three amended rules. The rules were submitted to the CSI Office on June 15, 2021, and the public comment period was open through June 30, 2021. Unless otherwise noted below, this recommendation reflects the version of the proposed rules filed with the CSI Office on June 15, 2021.

The proposed rules cover requirements to become a sponsor of a continuing education course, the standards by which sponsors are approved, and continuing education requirements to renew or reinstate a license. Amendments are proposed to enhance clarity, expand the list of recognized sponsors, remove biennial renewal for sponsors, remove a \$135 application fee for sponsors, and clarify exemptions from continuing education requirements.

During the early stakeholder outreach period, the Board sent notice of proposed rule changes to interested parties that have requested updates from the Board. No public comments were received during early stakeholder outreach or the CSI public comment period.

Licenses of the Board will be impacted by the requirement to meet minimum continuing education requirements to maintain a license. Failure to comply with this aspect of the rules may result in

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disciplinary action being taken against a license. Furthermore, licensees may incur a cost for continuing education courses which can range from free for online courses to several thousand dollars for clinical courses performed in a hospital setting. The rules also impact continuing education sponsors, by requiring that they provide continuing education relevant to dentistry with a sound scientific basis, as well as proven efficacy to ensure public safety. The proposed rules serve to ensure that practitioners of dentistry in Ohio are doing so competently and safely, ensuring public protection.

### **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 rule with the Joint Committee on Agency Rule Review.