



# Common Sense Initiative

Mike DeWine, Governor  
Jim Tressel, Lt. Governor

Joseph Baker, Director

## MEMORANDUM

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

**FROM:** Caleb White, Business Advocate

**DATE:** September 2, 2025

**RE:** CSI Review – Athletic Trainers Code of Ethical Conduct ( OAC 4755:3-2-01)

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 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 April 22, 2025, and the public comment period was held open through May 2, 2025. Unless otherwise noted below, this recommendation reflects the version of the proposed rule filed with the CSI Office on April 22, 2025.

Ohio Administrative Code (OAC) 4755:3-2-01 establishes the code of ethical conduct for athletic trainers practicing in Ohio. This rule is amended to broaden language surrounding harassment and disparagement, clarify language regarding reportable conduct, add a prohibition regarding the access and use of personal health information and personally identifiable information, and to clarify language surrounding financial interests.

During early stakeholder outreach, the Board sent the proposed rule to all license holders and the

---

**77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117**

**[CSIPublicComments@governor.ohio.gov](mailto:CSIPublicComments@governor.ohio.gov)**

Ohio Athletic Trainers' Association. Four comments were received during this period. Two of these comments expressed support for the proposed rule and two comments expressed concern that proposed language related to social media was too broad. In response to these comments, the Board attempted to clarify the intent of the rule. No comments were received during the CSI public comment period. However, after the CSI public comment period and following discussions with the CSI Office, the Board elected to make further edits to the rule to better align with related sections of code.

The business community impacted by the rule includes licensed athletic trainers and their employers. The adverse impact created by the rule includes sanctions for violating the code of ethics which can include potential fines, coursework and lost work time. The Board states that the adverse impacts created by the rule are necessary to protect the public by upholding a standard of conduct within the profession, to address recent complaints of Health Insurance Portability and Accountability Act violations, and to respond to complaints of grooming and bullying.

### **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.