



MEMORANDUM

TO: Amanda Ferguson, Executive Director, Ohio Chemical Dependency Professionals Board

FROM: Chris Smyke, Executive Assistant

DATE: October 28, 2016

RE: **CSI Review – Five-Year Review: Master’s Accreditation (OAC 4758-14-01)**

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 one rule being proposed without changes by the Ohio Chemical Dependency Professionals Board pursuant to the five-year review requirement in statute. Ohio Administrative Code (OAC) 4758-14-01 establishes the requirements for a college to apply for Master’s Accreditation with the Board. This rule package was submitted to the CSI Office on September 28, 2016 with the comment period ending on October 14, 2016. One comment was received during this time.

The Board, as recorded in the BIA, conducted stakeholder outreach through its Treatment and Education Committees. These committees meet quarterly and consist of public stakeholders representing state agencies, institutions of higher learning, treatment providers, nonprofits and board licensees.

In the BIA, the Board describes the adverse impacts on colleges as the time and fees associated with submitting an application and ensuring compliance with the requirements of the application.

Specifically, as established in OAC 4758-3-01 which is not in this rule package, application fees are \$300 and accreditation fees are \$3,000. The Board justifies this impact in order for students to get an education that they know will be accepted for licensure and so colleges can recruit students by advertising their accreditation.

During the CSI public comment period, one comment was received with multiple questions and a suggestion that the Board develop a direct path to licensure for general mental health clinicians who have adequate training. The Board responded to the questions and addressed the suggestion by explaining that it waives the examination requirements for mental health clinicians once they hold their mental health licenses.

After reviewing the draft rule and associated BIA, the CSI Office has determined the purpose of the rule is justified.

Recommendations

For the reasons described above, the CSI Office has no recommendations regarding this rule package.

Conclusion

Based on the above comments, the CSI Office concludes that the Ohio Chemical Dependency Professionals 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