



## MEMORANDUM

**TO:** Rachael Black, Ohio Industrial Commission

**FROM:** Sydney King, Regulatory Policy Advocate

**DATE:** March 30, 2015

**RE:** **CSI Review – Accessing Confidential Personal Information** (OAC 4121-4-01, 4121-4-02, 4121-4-03, 4121-4-04, and 4121-4-05)

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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

This rule package consists of five Ohio Industrial Commission no-change rules that address accessing confidential personal information. The rules are reviewed in accordance with the statutory five-year review requirement. The rule package was filed with the CSI Office on February 2, 2015 with a public comment period ending on February 16, 2014.

The rules provide the Commission's procedures for accessing confidential personal information by Ohio Industrial Commission employees and members. The rule package was reviewed during the Commission's Rules Advisory Committee. Members of the committee include representatives from the Ohio Manufacturers' Association, the Ohio Association of Self-Insuring Employers, the Ohio Chamber of Commerce and the Ohio AFL-CIO. No comments were received during CSI's public comment period.

In the BIA, the Commission states the rules have no adverse impact to the business community.

The rules do not impose regulations on the business community but on the Commission's employees and contractors when accessing confidential information. Therefore, the rules do not impose an adverse impact on business as enumerated in R.C. § 107.52. Accordingly, the rules do not require CSI review before filing with the Joint Committee on Agency Rule Review

**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 Industrial Commission should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.

cc: Mark Hamlin, Director of Regulatory Policy