



## MEMORANDUM

**TO:** Amy Kobe, Ohio Landscape Architects Board

**FROM:** Emily Kaylor, Regulatory Policy Advocate

**DATE:** November 7, 2016

**RE:** **CSI Review – Firm Certificate of Authorization (OAC 4703:1-3-02)**

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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 one amended rule submitted by the Ohio Landscape Architects Board (Board) for its statutorily-required five-year review. It was submitted to the CSI Office on October 14, 2016 and the comment period closed on October 31. Sixteen comments were received during this time.

A certificate of authorization is required for each landscape architecture firm to be recognized as a qualified service provider. The rule details the application process, annual renewal, and changes that require a new application or Board notification. Amendments are made to update the rule to include electronic means for application and remove the requirement that the certificate be displayed at the firm for public viewing.

The rule impacts registered landscape architecture firms, but the amendments should make compliance with the regulation easier and faster as they can now complete all the applications and renewals electronically. A fee is required with each application and annual renewal. These fees are \$125 and \$100, respectively, but are established in Ohio Administrative Code 4703:1-1-05, not part of this package.

The BIA states that the Board circulated the proposed changes to stakeholders via email and received few comments, all in support of the rule. Of the sixteen comments received during the CSI comment period, ten expressed support for the rule changes and six asked clarifying questions. The Board responded to each accordingly and one rule change occurred from the comments to remove a notarized affidavit requirement that was missed in the Board's edits.

After reviewing the proposed rule and the BIA, the CSI Office has determined that the rule satisfactorily meets the standards espoused by the CSI Office, and the purpose of the rule package is justified.

### **Recommendation**

For the reasons explained 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 Landscape Architects Board should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.