# CSI Rule Review Examples

- PUCO Transportation Rule – The State proposed rules that would have applied to companies like landscapers, homebuilders, and party/event coordinators the same requirements – covering issues like mileage records, maintenance logs, and driver health inspections – that apply to big rigs and other vehicles where transportation is a major part of the company's operation. The rules would have created a significant burden without addressing any identified safety issues, so CSI Ohio worked with the agency to withdraw the rules.

- Auto Dealer Hours of Operation Rule – The Department of Public Safety had rules that required automobile leasing dealerships operate a minimum of 30 hours per week, at least six of which had to occur Monday through Friday, from 7:00 a.m. to 5:00 p.m. CSI questioned why the state should tell a private business when and how much to operate, so required the agency to remove those unnecessary requirements from its rules.

- Tattoo Needle Requirements – State regulation of the tattoo industry required operators to sterilize and reuse its needles and other equipment, despite the fact that the industry standard – for both economic and safety reasons – has moved toward pre-sterilized disposable needles. CSI worked to ensure a common sense enforcement of the existing regulations while successfully working to change the statute and align the laws with the appropriate standards.

- Ground Water Monitoring Fee – The Ohio Environmental Protection Agency (OEPA) submitted a rule proposing to retain the fees for ground water monitoring of the construction and demolition debris industry. After extensive meetings with the industry and CSI, the OEPA rescinded the rule because of its adverse impact to businesses and because it determined the fee was unnecessary for the foreseeable future.

- Dairy Recordkeeping – A rule package was submitted to CSI by the Department of Agriculture (ODA) pertaining to recordkeeping requirements for dairy dealers. The

required records detailed the financial relationship between dairy producers and dairy dealers. The CSI Office questioned the need for the Department to mandate recordkeeping for financial transactions between two private businesses. The Department reevaluated the policy and ultimately rescinded the rule.

- Juice Processing – The CSI Office worked with raw juice companies, the Ohio Department of Agriculture (ODA), and the Ohio Department of Health (ODH) in order to assist companies with the expansion of their juice processing businesses. The changes the Departments made to their rules now allow companies to utilize a "central kitchen" model where raw juice companies produce their product in a central kitchen and deliver it to their own satellite establishments for sale. The work on these rules included careful analysis to ensure that none of the changes undermined the food safety precautions necessary to protect the public.

- Hospice Cancer Reporting Liability – The Ohio Department of Health submitted a rule package that established requirements for the Ohio Cancer Incidence Surveillance System. During the CSI public comment period, a statewide association expressed concerns with reporting requirements in the rules and the possibility that a hospice physician treating a cancer patient at the end-of-life – as opposed to an oncologist attempting to treat the cancer itself – might be liable for civil penalties if information was not reported. As a result of the CSI process, a compromise was developed that provided clarity to the requirements and eliminated the concerns of physicians providing this important end-of-life care.

- Other States Workers' Compensation Coverage – The Ohio Bureau of Workers' Compensation (BWC) submitted a rule package to CSI to create a new optional policy offering for Ohio businesses with employees who frequently work in other states. The proposed rule responds to a need that has been identified in the business community due to gaps in coverage that are difficult and/or expensive to fill when those employees are out of state. BWC engaged in a robust stakeholder outreach process in developing the rule, during which it heard strong support for providing other states coverage, but also received a significant amount of feedback on the logistics of the coverage. The BWC made a number of changes to the rules and has demonstrated flexibility in offering to revisit the rules with stakeholders as the implementation of the new coverage unfolds.