



Senate Bill 255
Written Testimony of Keith Kerns
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Interested Party
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On behalf of the Ohio Optometric Association (OOA), which represents nearly 70% of Ohio's Doctors of Optometry, thank you for the opportunity to submit brief comments on Senate Bill 255. While well-intentioned, Senate Bill 255 raises several areas of concern.

First, the bill would establish several duplicative requirements for state regulatory boards which are already performed on a regular basis. For instance, through the biennial budget process and with annual public reports to the Governor, boards regularly present information on board finances, funding sources, board members, outline the need for continued existence and provide other information called for in SB 255. Additionally, many boards are subject to sunset review which consistently addresses these issues. Requiring boards to implement the new mandates outlined in the bill may require boards to expend additional resources and take focus away from the primary role of public protection.

Second, portions of SB 255 are unnecessary. The legislature already maintains the authority to engage in fact-finding efforts and review processes of regulatory boards whenever it chooses. As you will recall, the legislature engaged in this process just last year and eliminated or combined several state regulatory boards. Moreover, the General Assembly took this action without the need of a statutory mandate.

Finally, the bill grants extensive new authority to the Legislative Service Commission, some of which appears to require the director of the commission to convey opinions on public policy matters to lawmakers – a role typically undertaken by those the legislative proposal impacts; namely, members of the public, interest groups and other affected parties. Furthermore, this new authority may also create scenarios in which the commission's traditional role as a nonpartisan agency is questioned.

Thank you for your consideration of these issues. We urge the committee to exercise caution when considering Senate Bill 255. Additionally, we encourage the committee to engage with the boards directly to obtain input on this proposal. I would be happy to assist should you have questions or need additional information in your review. Please feel free to contact me at kkerns@ooa.org or (614) 781-0708 or OOA Consulting Lobbyist Dan Leite at dleite@capitoladvocates.net or (614) 224-9900.