

## INITIAL RULE IMPACT STATEMENT

### TITLE 310. OKLAHOMA STATE DEPARTMENT OF HEALTH CHAPTER 678. OFFICE OF CLIENT ADVOCACY

1. **DESCRIPTION:**

SB1709 directed the transfer of employees, powers, duties, monies, and certain administrative rules of the Office of Client Advocacy (OCA) from the Oklahoma Human Services (OHS) to the Oklahoma State Department of Health (OSDH) effective November 1, 2024. The proposed permanent rules will be reflective of this program move and will adopt the policies of the OSDH and remove reference to OHS where applicable.

The proposed rule amendments remove references to divisions, officers, employees and services within OHS and replace the language with equal parties within OSDH. This will align existing procedures with the policies and procedures of the OSDH. While no substantive process are removed or replaced, rule citations and references to contact information are amended to reflect a program managed by OSDH. Where applicable, certain references remain pointed to OHS services.

2. **DESCRIPTION OF PERSONS AFFECTED AND COST IMPACT RESPONSE:**

This move will affect any client, employee, or stakeholder currently within the system of the Office of Client Advocacy located at Oklahoma Human Services. Functionally and foundationally the office will not change with this permanent rulemaking action. These changes are necessary to align the existing office to the policies, procedures, and rule citations of the Oklahoma State Department of Health.

3. **DESCRIPTION OF PERSONS BENEFITING, VALUE OF BENEFIT AND EXPECTED HEALTH OUTCOMES:**

There are no expected health outcomes affiliated with the program area move. The legislative intent of this move is to separate the investigative power of OCA from OHS to OSDH to create a more impartial atmosphere to client complaints.

4. **ECONOMIC IMPACT, COST OF COMPLIANCE, AND FEE CHANGES: COST OF COMPLIANCE AND FEE CHANGES:**

There are no fee increases or changes with this permanent rule-making action. The Department does not expect any economic impact to the public or those who seek the services of the OCA.

5. **COST AND BENEFITS OF IMPLEMENTATION AND ENFORCEMENT TO THE AGENCY:**

There are no anticipated costs associated with the implementation or enforcement of this rule change. The benefit of this implementation will be to provide a transparent and impartial investigation into allegations of abuse or misconduct by OHS service providers located under the umbrella of the OCA.

6. **IMPACT ON POLITICAL SUBDIVISIONS:**

There will be no impact on political subdivisions.

7. **ADVERSE EFFECT ON SMALL BUSINESS:**

There are no anticipated effects on small business.

8. **EFFORTS TO MINIMIZE COSTS OF THE RULE:**

There are no less costly means currently identified.

9. **EFFECT ON PUBLIC HEALTH AND SAFETY:**

No effect on public health and safety is projected.

10. **DETRIMENTAL EFFECTS ON PUBLIC HEALTH AND SAFETY WITHOUT ADOPTION:**

There are no detrimental effects on public health and safety.

11. **PREPARATION AND MODIFICATION DATES:**

This rule impact statement was prepared on August 26, 2024.