

Baldwin's

OHIO ADMINISTRATIVE CODE

Approved Edition
2026–2027

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Ohio Administrative Law Handbook
and Agency Directory



Editors-in-Chief

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INTRODUCTION TO THE 2026-2027 EDITION

Baldwin's Ohio Administrative Code

Volume 17

Ohio Administrative Law Handbook and Agency Directory

The 2026-2027 Edition of the Ohio Administrative Law Handbook and Agency Directory (Volume 17 of Baldwin's Ohio Administrative Code) provides definitive information about administrative law and agencies in Ohio. It offers an overview of the organization, powers and duties of state agencies, and text of relevant portions of the Ohio Revised Code.

This 2026-2027 Edition of the Ohio Administrative Law Handbook and Agency Directory replaces the 2025-2026 Edition of this work in its entirety.

Highlights

- Revised Chapter 4, the Adjudication Function
- Revised Chapter 5, State Appeals and Other Challenges to State and Local Administrative Actions
- Revised Chapter 8, Public Records and Open Meetings
- See Preface to the 2026-2027 Edition for additional summary of what's new

Thank you for subscribing to Ohio Administrative Law Handbook and Agency Directory. We hope you find this book an invaluable tool for your practice.

Christie Limbert, J.D.

Angela M. Sullivan, J.D.

Editors-in-chief Administrative Law Committee

Ohio State Bar Association

2026

Preface to the 2026-2027 Edition

The legislative, judicial, and executive branches of Ohio's government promulgate statutes, case law, and administrative regulations, respectively. This book addresses the latter. Generally, lawyers are familiar with statutes and case law. However, relatively few lawyers routinely encounter regulations and administrative practice. This book is designed to serve as a reference and practice guide for legal professionals. It is intended to be a resource for Ohio lawyers working through the procedures and practices of the myriad of state and local administrative agencies. The focus of this book is the statutory and administrative rules of process and procedure that agencies must follow in making their decisions, rather than the substantive subject-matter law of various administrative agencies.

Ohio and federal administrative law share the same fundamental structure and presumptions as both address the way executive branch agencies exercise their discretion and statutory authority. There are key differences between Ohio and federal administrative law, however. Notable among these are review of agency regulations in Ohio by the General Assembly's Joint Committee on Agency Rule Review (JCARR). The courts perform this function in the federal system. Another notable difference is judicial review of agency adjudications, including submission of new evidence in the Common Pleas Courts, rather than a review of the record in the federal courts. Finally, proposed agency rules from Ohio's administrative agencies are subject to review, particularly economic impact analysis, by the Common Sense Initiative (CSI) led by Ohio's Lt. Governor. The Ohio Secretary of State's Office and the Legislative Services Commission also participate procedurally in Ohio's administrative rules-making process. These and other differences underscore the need for Ohio lawyers to be familiar with the unique aspects of Ohio administrative law and practice.

What's New in the 2026-2027 Edition:

- Clarifications for summary suspension of professional licenses (§ 4:18)
- New section on the Fifth Amendment as applied to evidentiary rules in administrative hearings (§ 4:26)
- New section on expert witnesses in administrative hearings (§ 4:29)
- New section on sanctions in adjudication orders (§ 4:39)
- Discussion of the state's ability to appeal an award of attorney fees under R.C. 2335.39 and the pending Ohio Supreme Court case *State ex rel. Ohio Atty. Gen. v. Mohiuddin* (§ 6:15)
- Complete revision to Chapter 8, including the addition of many recent cases, clarifying and adding legal holdings, and updating text to reflect statutory changes
- New statutory definitions for personal notes, trial preparation records, attorney work product records, and specific investigatory work product (§ 8:11)
- Addition of four new statutory public records exemptions (§ 8:11)
- Discussion of police body-cam footage records and the application of *Marsy's law* to police body-cam footage in *State ex rel. GateHouse Media Ohio Holdings II, Inc. v. Columbus Police Dep't*, 2025-Ohio-5243, 2025 WL 3274795 (2025) (§ 8:11)
- New section on the seventy-five year expiration for public record exemptions (§ 8:12)

We would like to thank former editor-in-chief, Paul M. Nick, for his years of work on prior editions and for continuing to contribute as an author.

We also want to thank the publisher's staff, particularly Carol L. Fetter, J.D., for their assistance with this updated edition. Finally, we would like to thank the leadership and

members of the Administrative Law Committee of the Ohio State Bar Association. For lawyers practicing in the area of administrative law, the OSBA Administrative Law Committee is a great way to get involved with colleagues who share the interest in the field. Becoming an OSBA Board Certified Specialist in Administrative Agency Law is another way to highlight your skills and experience. All of us hope that this volume will provide you with support and assistance in your administrative law practice.

Christie Limbert, J.D.

Angela M. Sullivan, J.D.

Editors-in-chief

Administrative Law Committee

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About the General Editors of the 2026-2027 Edition

Angela M. Sullivan is a Principal Assistant Attorney General in the Health and Human Services Section at the Ohio Attorney General's Office. Ms. Sullivan represents the Ohio Department of Job and Family Services, the Ohio Department of Medicaid, and the Department of Children and Youth. Ms. Sullivan has been an OSBA Certified Specialist in Administrative Agency Law since 2017 and is a co-author of the Ohio Attorney General's Office Administrative Law Handbook. She received her J.D. from the Ohio State University Moritz College of Law in 2002, and her B.A. from the University of Dayton in 1998. Angela is a co-editor and the author of Chapter 5, State Appeals and Other Challenges to State and Local Administrative Actions and Chapter 8, Public Records and Open Meetings.

Christie S. Limbert serves as a Principal Assistant Attorney General in the Health and Human Services Section of the Ohio Attorney General's Office. She currently represents the Ohio Department of Insurance in administrative and civil litigation. Christie has spent her entire career as an attorney for the State of Ohio, first in the Ohio Attorney General's Office Charitable Law and Executive Agencies Sections and later as General Counsel of the Ohio Civil Rights Commission before returning to the Ohio Attorney General's Office in 2022. In her career she has represented over a dozen state agencies in administrative hearings, appellate work, and plaintiff-side and defense-side litigation. She received the Ohio Attorney General's Office Excellence in Writing Award in 2019 and PRIDE Award in 2024 and co-authored the Ohio Attorney General's Office Administrative Law Handbook. She has been certified as a Specialist in Administrative Agency Law by the Ohio State Bar Association since 2021 and has served as Chair of the Ohio State Bar Association Administrative Law Committee. She graduated with a B.A. summa cum laude with honors from Bowling Green State University and with a J.D. magna cum laude from the University of Toledo College of Law. Christie is a co-editor and the author of Chapter 4, The Adjudicative Function and Chapter 8, Public Records and Open Meetings.

About the Chapter Authors of the 2026-2027 Edition

Tony W. Bledsoe was appointed Legislative Inspector General in September of 2004, after serving as the Joint Legislative Ethics Committee's Chief Legal Counsel since 2001. Prior to Director Bledsoe's tenure at the Joint Legislative Ethics Committee, his past public service included time at the Ohio Department of Commerce as a securities investigative attorney and experience in the areas of election and campaign finance law. He is a graduate of Youngstown State University and The Ohio State University Moritz College of Law. Director Bledsoe is a member of the international Council on Government Ethics Laws and the Ohio Investigators Association. He is co-author of Text Chapter 9, Ethics for Public Officials, Public Employees, and Attorneys in Administrative Practice.

Ashley Sylvester Frustaci was appointed Executive Director for the Joint Committee on Agency Rule Review (JCARR) of the Ohio General Assembly in March of 2025. Prior to her appointment at JCARR, she served as Deputy Chief Legal Counsel for the Ohio Department of Education and Workforce and as Associate General Counsel for the Ohio Department of Developmental Disabilities. Ms. Sylvester previously served as Senior Legal Counsel for JCARR from 2012-2022. She earned her J.D. from the Cleveland-Marshall College of Law in 2010 with a concentration in Employment and Labor Law. She earned her B.A. from John Carroll University in 2006, where she majored in Political Science and minored in French. Ms. Sylvester is the author of Text Chapter 2, The Rulemaking Function.

Dustin Johnston-Green is Director of the Law Library and Professor of Law at the Claude W. Pettit College of Law, Ohio Northern University. Professor Johnston-Green has been an academic law librarian since 2016 and has taught a variety of legal research and writing courses, including advanced research instruction in Ohio law, tax law, litigation research, and international law. He has previously worked at the Charles B. Sears Law Library at the State University of New York at Buffalo Law School and the D'Angelo Law Library at the University of Chicago Law School. He received his Bachelor's degree from Ohio Wesleyan University, and his M.S.I.L.S. and J.D. from the State University of New York at Buffalo.

Michael R. Moran is an attorney and mediator in private practice in Gahanna, Ohio, and Magistrate for the City of Sunbury since 2006. He serves as Vice President & General Counsel for Royse Partners Limited, a specialty consulting firm. He was an Adjunct Professor at Capital University Law School for over 20 years, and is a retired municipal prosecutor and chief legal officer. He also retired honorably from the State of Ohio Adjutant General's Department as a Colonel in the Ohio Military Reserve, State Defense Forces, where he served as Inspector General and as acting Staff Judge Advocate, working on homeland security matters following the 9/11 attacks. With over 35 years of state, county and local government experience, he served as: Chief Counsel, Chief Bailiff & Director of Mediation for the Franklin County Probate Court, Executive Director & Counsel of the State Chiropractic Board, was appointed the 27th Franklin County Recorder, and previously was Chief of Staff for the County Recorder. He has extensive experience in criminal and civil law, plus federal, state, and local administrative law experience as a respondent's counsel, agency counsel, as a hearing officer/attorney hearing examiner in matters including occupational and professional licensing, public employee personnel, zoning, elections, public health, and legislative advocacy, having written legislation and rules enacted into law at the local and state levels.

He has served as the chair of multiple municipal and county boards. Mr. Moran graduated from the U.S. Navy Inspector General School, the U.S. Army Inspector General School, and the U.S. Army Advanced Military Police Branch Orientation Course. Mr. Moran has served as Chairman of the Ohio State Bar Association's Administrative Law Committee and was a founder and the first Chair of the OSBA Administrative Agency Law Specialty Board. He is admitted to practice law in Ohio, the District of Columbia, SCOTUS, the U.S. Sixth Circuit Court of Appeals, U.S. Tax Court, and over a dozen other federal, plus military trial and appellate courts. He has founded and served in leadership in multiple state and local professional organizations, plus educated and trained thousands of lawyers, judges, law enforcement personnel, and diverse professionals in continuing education and in-service training programs. He holds a Juris Doctor (J.D.) from Capital University, earned his Bachelor of Arts (B.A.) from Marietta College, and is a Certified Fraud Examiner (CFE). Mr. Moran authored Text Chapter 3, Agency Investigations, and co-authored Text Chapter 7, Local Administrative Agency Actions, along with Text Chapter 9, Ethics for Public Officials, Public Employees, and Attorneys in Administrative Practice.

Paul M. Nick serves as the Executive Director of the Ohio Ethics Commission where he oversees the state-wide responsibilities of the Commission. He joined the Ohio Ethics Commission as Investigative Counsel in 1995 and became Chief Investigative Attorney in 2000 and has served as a special prosecutor in over 25 cases statewide. As Executive Director his responsibilities include: providing ethics advice to the public and private sectors; confidentially investigating the alleged unethical actions of state and local public servants; managing financial disclosure made by 11,000 public office holders; conducting public education and providing information; and supervising the administrative functions of the Commission. Mr. Nick also represents the Commission before the General Assembly and other governmental bodies. Before joining the Ethics Commission staff, Mr. Nick was with the Columbus City Attorney's Office. He received his Bachelor of Arts degree in Economics from the University of Illinois at Urbana-Champaign. He earned his Juris Doctor degree from The Ohio State University where he served as Articles Editor of The Ohio State Law Journal. He is the past president and secretary/treasurer of the Council on Governmental Ethics Laws (COGEL). He is the co-author of Text Chapter 9, Ethics for Public Officials, Public Employees, and Attorneys in Administrative practice.

Lauren M. Ross is General Counsel for Sinclair Community College in Dayton Ohio. She previously worked for the Ohio Attorney General and for a law firm in Springfield, Ohio, where she focused her practice on education, labor and employment, and public sector law. She has served as an administrative hearing examiner. During her prior employment as an Assistant Ohio Attorney General, she served as Chief of the Transportation Section, Assistant Chief of the Education and Business and Government Regulation Sections, and Unit Supervisor in the Health and Human Services Section. A frequent lecturer on issues of education and employment law, Ms. Ross received her J.D. from Case Western Reserve University School of Law in 1984 and her B.A. from Middlebury College in 1981. Ms. Ross authored Text Chapter 6, Award of Attorney Fees in Administrative and Other Proceedings Involving the State.

Levi J. Tkach ("Catch") holds a BA in Social/Political Studies from Wilmington College and graduated from Cooley Law School with a concentration in administrative law. After completing an externship at the Ohio Attorney General's Office in the Health and Human Services Section in 2009, Mr. Tkach joined Graff & McGovern (formerly Graff & Associates). In 2016, Mr. Tkach became a Certified Specialist in Government Agency Law by the Ohio State Bar Association. Mr. Tkach focuses on representation of licensed professionals and companies before numerous state agencies including the Ohio Pharmacy Board; the Ohio Medical Board; and the Ohio Department of Commerce. For additional information, please visit www.graffmcgovern.com/levi-tkach/.



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