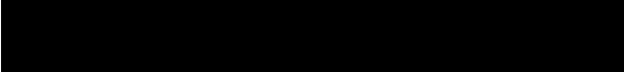




OHIO ETHICS COMMISSION
THE ATLAS BUILDING
8 EAST LONG STREET, SUITE 1200
COLUMBUS, OHIO 43215-2940
(614) 466-7090

February 12, 1993 Informal Opinion 1993-INF-0212-1

Doug Booth
Financial/Operational Audits
Internal Audit Department
Bureau of Workers' Compensation



Dear Mr. Booth:

You have asked for clarification of the Ohio Ethics Law's financial disclosure requirement as it applies to officials and employees of the Ohio Bureau of Workers' Compensation. In a summarized form, your questions are: (1) Whether the Ohio Bureau of Workers' Compensation (Bureau) is an administrative department of the state as defined in Section 102.02 (A) of the Revised Code; (2) Whether the titles of director, assistant director, deputy director, and division chief, as listed in Section 102.02 (A) of the Revised Code, are equivalent to the Bureau's department directors, assistant directors, deputy directors, and division chiefs; (3) Whether the titles listed in Ohio Ethics Commission Administrative Rule No. 102-5-01 (A), for purposes of R.C. 102.02 (B), are equivalent to the working titles used by the Bureau of Workers' Compensation for its officers and employees such that the Bureau officers and employees would be required, by R.C. 102.02 (B) and Ethics Commission rule, to file financial disclosure statements; and (4) Whether employees paid according to Schedule E-2 are required to file a financial disclosure statement.

Your first question is whether the Bureau is an administrative department of the state for purposes of R.C. 102.02 (A). In order to answer your question, it is necessary first to examine the historical development of the financial disclosure requirement.

The financial disclosure requirement was enacted by the Ohio General Assembly, in 1973, in Amended Substitute House Bill No. 55. The requirement, contained in R.C. 102.02 (A), stated, in pertinent part:

Every person who is elected to or is a candidate for a state, county, or city office, or the office of member of the United States Congress, and every person who is appointed to fill a vacancy for an unexpired term in such an elective office, and the director and deputy directors of any department or agency of the state . . . shall file with the appropriate ethics commission on a form prescribed by the commission, a statement disclosing [certain financial information]. (Emphasis added.)

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Pursuant to this requirement, the director and deputy directors of every state department and agency were required to file 1974 financial disclosure statements beginning in 1975. Among the directors and deputy directors who filed 1974 financial disclosure statements in 1975 were the officials of the Bureau of Workmen's Compensation.

The financial disclosure requirement contained in Division (A) of R.C. 102.02 was amended by Amended House Bill No. 1040, effective August 27, 1976. The amended language provided as follows, in pertinent part:

Every person who is elected to or is a candidate for a state, county, or city office, or the office of member of the United States Congress, and every person who is appointed to fill a vacancy for an unexpired term in such an elective office, and the director, assistant directors, deputy directors, division chiefs, or persons of equivalent rank of any administrative department of the state . . . shall file with the appropriate ethics commission on a form prescribed by the commission, a statement disclosing [certain financial information].
(Emphasis added.)

The most obvious changes in the requirement were: (1) the deletion of the term "agency," and (2) the expanded list of officials within each department required to file, from "director and deputy directors" to "director, assistant directors, deputy directors, division chiefs, or persons of equivalent rank of any administrative department."

Subsequent to this amendment, the Ethics Commission undertook a comprehensive project, in late 1976, to identify the individuals within state departments who were required, by R.C. 102.02 (A), to file financial disclosure statements. The Ethics Commission first compiled a list of 21 state entities it considered administrative departments of the state. The phrase "administrative department of the state" is not defined for purposes of R.C. 102.02. However, in 1976, Revised Code Chapter 121., which governs the organization and administration of various state departments, did contain a definition of the term "department." R.C. 121.01 (A) provided that, for purposes of Chapter 121., the word "'department' means the several departments of state administration enumerated in section 121.02 of the Revised Code." Revised Code Section 121.02 stated: "The following administrative departments and their respective directors are hereby created," and then specifically listed various departments of the state. In late 1976 and early 1977, R.C. 121.02 listed 18 administrative departments.

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The Revised Code as it appeared in late 1976 and early 1977 further identified "administrative department heads," in R.C. 121.03, as including the heads of three state entities, the Department of Taxation, the Bureau of Employment Services, and the Bureau of Workmen's Compensation, that were not included in R.C. 121.02, but who were appointed by the Governor. To this date, the list of administrative department heads in R.C. 121.03 still includes the administrative heads of two state entities that are not included within the list of "departments" set forth in R.C. 121.02. Consequently, it appears that the term "administrative department of the state," as distinguished from the term "department," is not limited to those departments listed in R.C. 121.02.

All 18 of the departments listed in R.C. 121.02, in 1976, were included on the Ethics Commission's 1976 list of administrative departments of the state. The Ethics Commission also listed the three other entities as "administrative departments of the state" in 1976. They were the three entities referenced in R.C. 121.03, including the Bureau of Workmen's Compensation. These twenty-one entities, including the 18 listed in R.C. 121.02, and the three mentioned in R.C. 121.03, were considered, by the Ethics Commission, as administrative departments of the state whose director, assistant directors, deputy directors, division chiefs, or persons of equivalent rank were required, by R.C. 102.02 (A), to file financial disclosure statements.

After compiling this list of administrative departments, for purposes of R.C. 102.02 (A), the Ethics Commission contacted each department listed and requested an organizational chart. An organizational chart was received from the Bureau of Workmen's Compensation. Ethics Commission staff members used the organizational charts, in meetings with the top officials of each department, to determine which officials within the departments met the "equivalent rank" requirement and would be required to file financial disclosure statements. The Ethics Commission's process determined whether a position within a state department not specifically labeled director, assistant director, deputy director, or division chief was nevertheless a position of rank equivalent to one of the named positions.

As a result of this review, the Ethics Commission staff identified thirty-five people who held positions within the Bureau of Workmen's Compensation as required, by R.C. 102.02 (A), to file financial disclosure statements.

Subsequent to this determination, the Administrator of the renamed Bureau of Workers' Compensation was removed from the R.C. 121.03 list of administrative department heads appointed by the Governor. The Administrator of the Bureau of Workers' Compensation

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is now appointed by the Workers' Compensation Board. R.C. 4121.12 (J)(6). Regardless of this, the Ohio Ethics Commission has not removed the Bureau of Workers' Compensation from its list of administrative departments whose director, assistant directors, deputy directors, division chiefs, or persons of equivalent rank are required to file financial disclosure statements. The Ethics Commission has used the combined lists of "departments" and "administrative departments" referred to in R.C. 121.02 and 121.03 as the nucleus for its own determination of "administrative departments of the state," but has not considered the lists to be inclusive of all "administrative departments of the state" for purposes of R.C. 102.02 (A).

The fact that an administrative department head is no longer appointed by the Governor, and therefore is no longer part of the list in R.C. 121.03, does not necessarily mean that the department is no longer an "administrative department of the state" for purposes of R.C. 102.02 (A). The General Assembly made changes in the Bureau's structure and organization, but did not change the basic function and purposes of the Bureau, as described below. The administrator of the Bureau of Workers' Compensation was previously appointed by the Governor, and thus the Bureau was an "administrative department" for purposes of R.C. 121.03, even though the Bureau was not created pursuant to R.C. 121.02. The fact that the Governor no longer appoints the administrator does not necessarily exclude the Bureau from the Ohio Ethics Commission's list of entities that are "administrative departments of the state" for purposes of R.C. 102.02 (A).

In 1986, the Ethics Commission reviewed the duties of various state agencies and identified two other state entities that are not included as "departments" in R.C. 121.02, and whose department heads are not appointed pursuant to R.C. 121.03, as administrative departments of the state, for purposes of R.C. 102.02 (A). These state agencies are the Department of Education and the Office of the Adjutant General. Therefore, state departments listed in R.C. 121.02, or state entities whose department heads are appointed pursuant to R.C. 121.03, are not the only departments whose identified officials are required to file financial disclosure statements pursuant to R.C. 102.02 (A).

In order to determine whether officials and employees of the Bureau of Workers' Compensation are required, by R.C. 102.02 (A), to file financial disclosure statements, it is necessary to determine whether the Bureau of Workers' Compensation constitutes an "administrative department of the state," regardless of its removal from R.C. 121.03. It is a well-settled rule of statutory construction that, in the absence of a statutory definition or technical meaning, the words and phrases used in a statute must be construed according to grammar and common usage. R.C. 1.42. The

New Lexicon Webster's Dictionary of the English Language defines "administrative" as "concerned with administration," and "administration" as the act of administering, which is defined as managing or directing. New Lexicon Webster's Dictionary of the English Language 11. Therefore, "administrative" means concerned with managing or directing. The same dictionary defines "department" as "a distinct branch of a whole, e.g. of a . . . state . . . administration." Id. 257. Therefore, an "administrative department of the state," as that term is used in R.C. 102.02 (A), is a distinct branch of the state that is concerned with managing or directing.

The Bureau of Workers' Compensation was created by statute, pursuant to constitutional mandate (Art. II, § 35), and is responsible for managing and directing the Workers' Compensation and special workers' compensation programs in the state of Ohio. R.C. Chapters 4121., 4123., 4127., and 4131. The Bureau of Workers' Compensation fulfills an important public policy role, to provide compensation for loss sustained or medical expenses incurred by an employee or employee's dependents on account of injury, occupational disease, or death suffered or contracted in the course of employment. See, e.g., R.C. 4123.54, 4127.13, and 4131.05. The compensation provided to injured or ill workers, or the dependents of workers who are killed, as a result of an injury suffered or occupational illness contracted as a result of employment, is paid from one of the workers' compensation insurance funds. See, e.g., R.C. 4123.30-.32, 4123.35, 4123.412, 4127.05, 4131.03, and 4131.13.

The Bureau of Workers' Compensation is a state entity, charged with the operation of the state's workers' compensation program, that is administered by the administrator of workers' compensation and governed by the Workers' Compensation Board. R.C. 4121.12. The Workers' Compensation Board is composed of twelve members, eight of whom are compensated members, appointed by the Governor with the consent of the Senate. R.C. 4121.12. The other four members are the Chairman and ranking minority members of the standing committees of the house and senate concerning Chapters 4121., 4123., 4127., and 4131. Id. All employers, and most employees, in the state are subject to the jurisdiction of the Bureau of Workers' Compensation. See generally R.C. 4121.01 (C) and (D), R.C. 4123.01 (A) and (B), R.C. 4123.02, R.C. 4123.35, R.C. 4127.01, R.C. 4131.01 (D), and 4131.11 (D).

The Bureau of Workers' Compensation, through its administrator and board, is charged with the responsibility of administering the state's workers' compensation insurance fund. In this role, the Bureau, among other duties, determines the contributions that must be made to the insurance funds by the employers in the state, determines the level of benefits to which a worker or his

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dependents is eligible, administers the payment of benefits to workers and their dependents, reviews and processes applications for claims, aids in the rehabilitation of injured workers, and makes investments of the workers' compensation insurance fund in order to ensure its healthy continuation. See, e.g., R.C. 4121.39, 4121.43-.44, 4121.61-.70, 4123.29, and 4123.44.

Clearly, the Bureau is administering a distinct branch of the state. Just as the Bureau of Employment Services has numerous and exacting duties involving unemployment compensation and other benefits paid to residents of the state, and the Department of Education is charged with numerous duties involving the educational needs of the citizens of the state, the Bureau of Workers' Compensation has myriad public duties involving the administration of the workers' compensation program in Ohio. Therefore, for purposes of R.C. 102.02 (A), the Bureau of Workers' Compensation is an "administrative department of the state," and the director, assistant directors, deputy directors, division chiefs, or persons of equivalent rank are required, by R.C. 102.02 (A), to file financial disclosure statements.

Your second question is whether the titles of director, assistant director, deputy director and division chief, as listed in R.C. 102.02 (A), are equivalent to the Bureau's department directors, assistant directors, deputy directors, and division chiefs.

R.C. 102.02 (A) states that the following officials within an administrative department of the state shall file financial disclosure statements: "the director, assistant directors, deputy directors, division chiefs, or persons of equivalent rank." (Emphasis added.) The phrase "or persons of equivalent rank" must be read to apply to all of the identified individuals in the rest of the phrase. In the phrase at issue, the elements are all nouns or noun phrases connected by the same conjunction, "or," in a series. Usually, when two or more nouns or noun phrases are connected in a series, the conjunction is omitted, but understood, between all of the elements except the final two. J. Opdycke, Harper's English Grammar 203 (1987). A comma is substituted for the conjunction between all but the final two elements in the series, and a comma may be used along with the conjunction, to prevent confusion, between the penultimate and ultimate elements of the series. Id.

Applying these general rules to the identification of persons connected with an administrative department of the state who are required to file financial disclosure statements, it must be assumed that the conjunction "or" connects not only the final two noun phrases of the series, but connects all five nouns or noun phrases. Therefore, those persons connected with administrative

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departments of the state who are required, by R.C. 102.02 (A), to file financial disclosure statements are the: director or person of equivalent rank; assistant directors or persons of equivalent rank; deputy directors or persons of equivalent rank; and division chiefs or persons of equivalent rank.

Given this conclusion, it is necessary to determine which officials and employees within the Bureau of Workers' Compensation are required to file financial disclosure statements. As mentioned above, after its review of the table of organization for the Bureau of Workmen's Compensation in 1977, the Ethics Commission identified thirty-five officials and employees within the Bureau who were required to file financial disclosure statements by R.C. 102.02 (A). At that time, the Commission determined the persons "of equivalent rank" by asking department officials if there were any positions not named director, assistant director, deputy director, or division chief, but which exercised at least as much discretion as a division chief, the lowest rank specifically identified by statute. The staff also considered the pay classification of various positions and determined whether the position was classified or unclassified. The Commission asked department officials if the person who held a particular position set policy, had rule-making authority, or let contracts. The Commission also determined how many other employees the person in the position supervised and to whom the person reported.

However, you have explained that the Bureau of Workers' Compensation has been substantially reorganized since 1977. You have provided the Ethics Commission with a current Table of Organization for the Bureau of Workers' Compensation. Each administrative department of the state is structured reflecting the duties and organization imposed on the department by statute and the authority delegated to the administrative head of the department to organize the department. The Bureau of Workers' Compensation is structured by the Bureau's administrator in order to achieve the most efficient performance of the Bureau's functions. R.C. 4121.121 (C). However, it is clear, from R.C. 102.02 (A), that, regardless of what the Bureau calls its high-ranking officials and employees, officials other than those specifically named "director," "assistant director," "deputy director," or "division chief" may be required to file financial disclosure statements. The fact that the Bureau chooses not to call a particular individual a "department director," "assistant director," "division chief," or "deputy director" does not mean that the individual will be exempted from the requirement to file a financial disclosure statement. Additionally, the fact that the Bureau calls a particular individual a "department director," "assistant director," "deputy director," or "division chief," is not determinative of whether the individual will be required to file a financial disclosure statement. In general, the title of a

particular individual is not the most important consideration. The Commission makes an analysis of the individual's function, rather than his title. This can be illustrated by the Bureau's description of its administrative head until recently as the "Administrator," and now as the "Chief Executive Officer." The function of the position remains substantially the same regardless of the change in title.

Although the Bureau of Workers' Compensation is not a "department" established pursuant to R.C. Chapter 121., it is an "administrative department of the state" as that term is used in R.C. 102.02 (A), and it is necessary to determine which Bureau employees are required to file under Section 102.02 (A). The Bureau does not use the terms "director," "assistant director," "deputy director," or "division chief," as those terms are used in Chapter 121. agencies. However, since the terms "director," "assistant director," "deputy director," and "division chief" are terms that are used in relation to the organization of a number of state departments, it is helpful to consider the meanings of the terms used in Chapter 121. as illustrations for the meanings of the terms used in R.C. 102.02 (A). Although the definitions of positions in Chapter 121. are not directly applicable to R.C. 102.02 (A), the terms and the quality of positions they connote can be analogized to Bureau officials and employees in order to better determine which officials within the Bureau of Workers' Compensation hold positions of "equivalent rank" to the positions enumerated in R.C. 102.02 (A).

A department director, as that term is used in Chapter 121., is the "administrative . . . head" of a department, and shall direct, supervise, and control the officers and divisions of the department. See R.C. 121.03 and 121.07. The administrator of the Bureau of Workers' Compensation is responsible for the "management of the bureau of workers' compensation and for the discharge of all administrative duties imposed upon the workers' compensation board and the administrator in [Chapter 4121.] and Chapters 4123., 4127., and 4131. of the Revised Code." R.C. 4121.121. The Administrator has numerous duties, enumerated in part in R.C. 4121.121. In the discharge of some of these duties, the administrator: (1) shall employ, direct, and supervise all deputies and other employees required in connection with the performance of the duties assigned to the bureau by Chapters 4121., 4123., 4127., and 4131.; (2) shall reorganize the work and administrative organization of the bureau for most efficient administration; (3) shall provide offices, equipment, supplies, and facilities for the bureau, the board, the industrial commission, the district hearing officers, the staff hearing officers, the regional boards of review, and the employees of each of these entities; (4) keep all accounts and records necessary to the collection, administration, and distribution of the workers' compensation funds; and (5) exercise the investment

powers of the bureau, in the name of the bureau or its nominee, subject to the approval of the Workers' Compensation Board. R.C. 4121.121. According to the current Table of Organization, the administrative head of the Bureau of Workers' Compensation is the Chief Executive Officer (CEO). The Bureau's Division Chiefs are required to report to the CEO. The CEO is the "person of equivalent rank," within the Bureau, to the director of a Chapter 121. state department. Therefore, the Chief Executive Officer of the Bureau of Workers' Compensation is required, by R.C. 102.02 (A), to file a financial disclosure statement.

The duties of the "assistant directors" of state departments are not as completely set forth in Chapter 121. R.C. 121.05 states that an "assistant director" is appointed by the director, and that the assistant director shall act as director in the absence or disability of the director, and shall act as director when the position of director is vacant. An assistant director may be designated, by the director, to serve in the director's place as a member of any board or other body of which the director is, by law, a member. R.C. 121.05. Aside from these descriptions, the position of assistant director is not further specified. An examination of the Table of Organization provided by you does not immediately reveal any individual who serves in a position equivalent to an "assistant director" of other state offices. If there is any such person whose duties are similar to those described above, the Commission requests that the Bureau inform the Commission. Any such individual would be required, by R.C. 102.02 (A), to file a financial disclosure statement.

The next group of individuals identified in R.C. 102.02 (A) are "deputy directors." The duties of a deputy director are not fully detailed in R.C. Chapter 121., beyond a brief reference in R.C. 121.05 to "deputy directors" serving in the stead of the director on boards of which the director is an appointee. Therefore, Chapter 121. is of little assistance in determining which officials are "persons of equivalent rank" to deputy directors. However, the position of deputy director is below the positions of director and any assistant director, and above the position of division chief. R.C. 4121.121 (B) states that the Bureau's administrator shall "employ, direct, and supervise all deputies and other employees required in connection with the performance of the duties assigned to the Bureau." In the absence of an individual holding the rank of assistant director, the highest ranking officials employed, directed, and supervised by the CEO are the "deputies" employed by the CEO, for purposes of the application of R.C. 102.02 (A). They hold positions under the Director, and above all other positions in the Bureau. These individuals, therefore, hold positions of equivalent rank to the positions held by deputy directors in other state administrative departments. In the Bureau of Workers' Compensation, the officials

who are directly subordinate to the CEO are the chief officers of nine sections of the Bureau. These nine section chiefs, called "Division Chiefs" by the Bureau, hold positions of equivalent rank to the deputy directors in other state departments, and are accordingly required to file financial disclosure statements by R.C. 102.02 (A). The nine Division Chiefs are (1) the Chief Actuarial Officer; (2) the Chief Human Resources Officer; (3) the Chief of Government/Public Affairs; (4) the Chief Legal Officer; (5) the Chief Information Officer; (6) the Chief Operations Officer; (7) the Chief Finance Officer; (8) the Chief of Internal Audit; and (9) the Chief Underwriting Officer.

The other group of state officers identified in R.C. 102.02 (A) are "division chiefs." A "division" is defined in R.C. 121.01 (B) as "a part of a department established pursuant to R.C. 121.07 of the Revised Code for the convenient performance of one or more of the functions committed to a department." R.C. 121.07 provides for the creation of divisions within state departments as follows: "[T]he director of each department shall establish divisions within his department, and distribute the work of the department among such divisions." According to the Table of Organization you provided, the Bureau of Workers' Compensation is divided, below the agency level, into numerous sections. These "divisions," called departments or groups by the Bureau, are headed by individuals with various titles, but who hold positions of a rank equivalent to Division Chiefs in other state departments. The individuals in these positions report directly to the Bureau's "Division Chiefs," who, for purposes of R.C. 102.02 (A), hold ranks equivalent to deputy directors in other state departments. The positions that are of equivalent rank to "division chief," in the Bureau, are the: (1) Director of Public Information; (2) Director of Legislative Information; (3) Director of Sepcial Projects; (4) Director of Issue Resolution; (5) Economic Development Liaison; (6) Director of Actuarial Services; (7) Senior Property and Casualty Actuary; (8) Director of Fraud Investigations; (9) Director of Strategic Planning; (10) Director of Consulting & Audits; (11) Director of Project Management; (12) Director of Business Engineering; (13) Division Controller; (14) Director of Applications Software; (15) Director of Operations; (16) Director of Production Control; (17) Director of Risk Technology Services; (18) Director of Safety and Hygiene; (19) Director of Risk Process Services; (20) Director of Risk Field Services; (21) Director of Self-Insured Services; (22) Director of Investments; (23) Controller; (24) Manager of Office Services; (25) two Assistant Directors of Law; (26) Director of Central Claims Operations; (27) Director of Rehabilitation; (28) Director of Claims Field Operations; (29) Director of Claims Technology Services; (30) Director of Personnel/Recruitment; (31) Director of Employment/Labor Relations; (32) Director of Payroll/Benefits; (33) Director of Training; (34) Director of Communications; (35) Director of EEO; and (36) Director of

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Marketing. If there are other divisions, or departments or groups, that have been formed since the Table of Organization was provided to the Commission, the directors of these departments or groups hold positions equivalent to division chiefs, and accordingly are also required, by R.C. 102.02 (A), to file financial disclosure statements.

Given the conclusions reached above, it is unnecessary to answer your third question. That question deals with Ohio Administrative Code Rule No. 102-5-01 (A). This rule was adopted by the Ethics Commission pursuant to R.C. 102.02 (B), and refers to individuals who are required to file financial disclosure statements pursuant to R.C. 102.02 (B). Officers and employees required to file by R.C. 102.02 (A), including the officers and employees of the Bureau, are not subject to OAC Rule No. 102-5-01.

Your final question is whether employees paid according to Schedule E-2 are required to file a financial disclosure statement. You have explained that employees formerly paid according to Schedule C are now paid according to Schedule E-2.

R.C. 102.02 (A) provides, in pertinent part: "[E]very public official or employee who is paid a salary or wage in accordance with schedule C of section 124.15 of the Revised Code . . . shall file . . . a [financial disclosure statement]." Accordingly, all public officials and employees paid according to Schedule C must file an annual financial disclosure statement with the Commission. It appears that the Legislature may have intended to include persons paid according to Schedule E-2 in the financial disclosure requirement. This apparent intent is indicated by the following exemption included in R.C. 102.02 (A): "any physician or psychiatrist paid a salary or wage in accordance with schedule C of section 124.15 of the Revised Code or schedule E-2 of section 124.15 of the Revised Code and whose primary duties do not require the exercise of administrative discretion" is exempted from the requirement to file a financial disclosure statement. (Emphasis added.) It appears that there would be no need for the exemption of physicians or psychiatrists paid according to Schedule E-2, unless the Legislature intended to generally include employees paid according to Schedule E-2, along with employees paid according to Schedule C, as within the class of public officials and employees required to file financial disclosure statements. However, there is currently no requirement, within R.C. 102.02 (A), that officials or employees who are paid according to Schedule E-2 must file financial disclosure statements. This is true even if the official or employee was formerly paid according to Schedule C, and accordingly within the class of persons required, by R.C. 102.02 (A), to file financial disclosure statements. Therefore, persons who were paid according to Schedule E-2 in 1992 are not required to file financial disclosure statements for that calendar year.

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However, if a person was paid according to Schedule C for even one day of 1992, that official or employee must file a financial disclosure statement for 1992.

This opinion was approved by the Ethics Commission at its meeting on February 12, 1993. The conclusions of this opinion, that the Bureau of Workers' Compensation is an "administrative department of the state" for purposes of R.C. 102.02 (A), and that certain officials and employees of the Bureau hold ranks equivalent to the positions of Department Director, Deputy Director, and Division Chief, apply only to the questions you have asked about the financial disclosure requirements of the Ethics Law. The opinion is based on the facts presented and is limited to questions arising under Chapter 102. and Sections 2921.42 and 2921.43 of the Revised Code and does not purport to interpret other laws or rules. The Commission has no authority to find that Bureau employees occupy a particular statutory classification for state compensation or other administrative laws.

If you have any questions, please feel free to contact this Office again.

Sincerely,


Jennifer A. Hardin
Staff Attorney