



RECEIVED
IRRC

2014 SEP 15 PM 2: 14

September 15, 2014

The Honorable John F. Mizner, Esq.
Chairman
Pennsylvania Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

**RE: Final Regulation by Department of State – Increasing Lobbying Disclosure
Registration Fee #16-56 (IRRC# 3012)**

Dear Chairman Mizner and Commission Members:

The Pennsylvania Homecare Association (PHA), which represents more than 700 homecare, home health and hospice agencies focused on caring for and supporting people in their homes, strongly opposes the Department of State’s final regulation to increase the lobbyist registration fee from \$200 to \$400 and echoes the concerns about access and transparency raised by the Pennsylvania Association for Government Relations (PAGR) in their September 11, 2014 comments.

As a small, nonprofit trade association, a \$200 (100%) increase in the lobbyist registration fee would place our organization at a significant competitive disadvantage and severely limit our ability to effectively advocate on behalf of our members. This new increase would come only a few years after the Department of State increased the registration fee by 100% for the 2011-2012 registration period. PHA is also concerned with the unintended consequences an additional increase would have on transparency as well as the economic barriers it creates for citizen participation in the legislative process. Access to legislators and government officials should not be limited to those who can afford to pay.

It is with this in mind and more that PHA respectfully requests that you reject this final regulation.

Thank you for your consideration.

Sincerely,

Vicki Hoak, CEO

Your *partner* in
bringing *care home*