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Mr. Silvan B. Lutkewitte III
Chairman
PA Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

June 26, 2013

Re: Comments on Regulation #16 – 56: Lobbying Disclosure Registration Fee

Dear Chairman Lutkewitte,

Thank you for providing the National Association of Social Workers – Pennsylvania Chapter (NASW-PA) with the opportunity to comment on this important regulation. The proposal in this regulation to increase the biennial fee for lobbyist registration from \$200 to \$700 would be extraordinarily burdensome, particularly for non-profits like NASW-PA.

We employ two lobbyists to cover a range of issues and causes from licensure issues, health care, judiciary, equality issues, education initiatives and more. Even now at \$400 for two individuals, the lobbyist registration fee is at the upper end of the threshold we find acceptable. NASW-PA not only represents social workers, but we often join coalitions to give a voice to underserved populations. If this regulation was adopted, I fear that we would not be able to serve our members adequately and those populations for whom we advocate would be further marginalized.

NASW-PA would prefer to see the amount remain at its current \$200 level. However, if the Department of State determines that an increase is necessary, we would advocate for keeping the increase at the rate of inflation, as others making comments have suggested; or at least having a lower rate for non-profit entities to pay as they do in Indiana and Texas. Our organization simply can't agree to an increase of 700% over a few short years. It would severely inhibit our ability to represent the interests of social workers within state government.

Sincerely,

Ron Simon, MSW, LCSW
Executive Director
National Association of Social Workers – PA Chapter