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From:

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To: Cc:

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Subject: Date: Regulation #16A-724 (IRRC #3203) Wednesday, July 4, 2018 1:49:03 PM IIII - 0 2019

Independent Regulatory
Review Commission

## Dear Ms. Wolfgang:

I am a licensed Massage Therapist in the Pittsburgh area (have been practicing for 19 years; graduated from the Pittsburgh School of Massage Therapy in 1999) and have just been informed of the PA Board of Massage Therapy's proposed increases. I will simply cut to the chase here and tell you that I feel that the Board is just plain gauging us if they proceed with these increases, the worst of which is the bi-annual renewal fee of \$200!! That is a crime waiting to happen. A lot of therapists work part-time and are paid much less as employees (\$15-\$20 per hour) than those in private practice, mostly because they can't afford to launch themselves in private practice or don't have a suitable facility, the business experience, etc. What people are paid per hour in our industry as employees is a huge difference from what 1) the private service providers earn, and 2) is an even greater difference from what clients pay as a retail price to those employers who may be hotels, spas, chiropractors, resorts, massage chains like Massage Envy, etc. Most simply will be hard-pressed to afford such an increase, and what you'll be inviting here is for people to start working "under the table" to avoid the fees and stay under the radar. This, of course, completely defeats what the Board and licensure was created for in the first place from a public safety point of view, or to regulate an industry in PA that had no regulation since its beginnings here. I think licensure was a good idea from the perspective of discouraging those who would "practice" massage therapy with little to no training, or no thorough education regarding anatomy, physiology, contraindications, pathology, etc., but increasing fees to this extent I feel will send our industry BACKWARD with regard to the above.

I realize the state of PA needs to make more money, given our debt, etc., but at least make these increases affordable! For someone coming right out of school and getting their initial license, please only increase it from \$65 to perhaps \$75; for the approval of continuing education programs, please increase to no more than \$85 (as therapists, we want to see a variety of programs offered that are both convenient and affordable, and gauging those who would provide such programs only limits what we have access to, and once you do that, the remaining providers will raise their fees because they know we need the credits and will pay the going rates because there will be less to choose from!). The final fee... bi-annual renewal... is the most critical here as I have discussed above. Laying an increase of \$125 on all of us to continue our licenses is bad business in the long run, given what we actually make per year. You may argue that other professionals such as medical doctors, chiropractors and nurses pay more than we do, but they earn A LOT MORE than we do. Doctors can take insurance payments, which we cannot, so PLEASE, PLEASE reconsider this last fee. At the very most, only increase it to \$100, but I would strongly encourage you to do it at a much slower rate... \$85 this coming year, \$100 two years later and then keep it there for a number of years. Otherwise, you're not doing our industry in this state any justice at all, nor encouraging people to either become MTs in this state or remain licensed if they can get away with anything otherwise.

Please have greater-reaching vision on this matter and encourage the Board to scale back these increases for the mutual benefit of both therapists and clients. Massage Therapy has been steadily gaining popularity over the last 15 years, especially with the public seeing the ongoing benefits of it, so we ALL win (including the state) if the increases are made gradually. Thank you in advance for your thoughtful consideration on this matter.

Respectfully submitted,

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