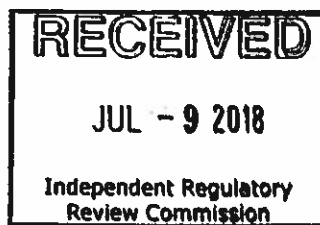


3203



From: Neale
To: ST. Regulatory Counsel
Subject: Regulation #16A-724 (IRRC #3203)
Date: Thursday, July 5, 2018 1:40:15 PM

To whom it may concern:

With regards to the increase in licensing fees for PA massage therapists, several aspects of the proposed regulation changes are cause for great concern, specifically: the amount that each fee is to be increased, comparability to other states bordering PA, and the rationale behind the increase.

Upon reviewing the proposal, there does not appear to be a strong, detailed argument for the severity of the increase. The only reasons I could discern from the correspondence stated that the current fees, as established in 2011, have been inadequate to cover the cost of operations for the state's department for massage therapy regulations/licensing. The concern here stems from two key points: 1) When the initial fees were established in 2011, what rationale was used to determine the fees at that point, and why did it take seven years to determine that the fees needed to be adjusted to adequately cover costs, when it seems that deficits were already noticeable from the start? 2) Why is such a drastic change needed at this time, when there appears to be no change in the rate of activity by the state's department?

Additionally, there appears to be no information regarding the various activities that the department is responsible for, as relates to cost cutting measures which would reduce the debts accumulated, and/or reduce spending by the department. Instead, it seems that this increase is simply a bandage which is being slapped onto a department that was unable to effectively operate within it's own means, and a smaller rate adjustment years ago may have helped offset the debts which accumulated...instead, the burden of this mismanagement is to be put onto the licensed massage therapists of the state, many of whom are barely making enough income to cover their own operating fees and cost of living expenses, without having to deal with a licensing fee increase in addition to costs associated with continued licensing requirements (CEUs, etc.)

Lastly, as relates to bordering states...of the states listed in the proposal, only two states had comparable biannual renewal fees to the proposed PA increase (Maryland and West Virginia), whereas states of similar sizes and populations to PA had much lower fees. How are these states able to operate within costs, having fees close to or only slightly more than PA's current renewal fee? Has any investigation taken place by the PA board to see how the other state's operate within their budgets? Are these other states considering licensing fee increases as well? It seems we need more information to make a truly informed decision about whether the proposed increases are justified.

In conclusion, it is understood that from time to time there may be a need to increase licensing fees for PA state's various board departments, but to propose an increase of close to 200% (using the renewal fee as an example) is simply showing that the department failed to adequately assess operating costs from the onset of operation, and it is unfair to ask the hard-working LMTs of PA to blindly cover these deficits and costs, without any other measures being taken (cost-cutting analysis, etc). Thank you for taking the time to read this.

--W Neale Lanigan, LMT