

3203

From: Elaine Dellande
To: ST. Regulatory Counsel
Subject: Regulation #16A-724 (IRRC #3203)
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Jacqueline A. Wolfgang, Assistant Counsel
Department of State
P.O. Box 69523
Harrisburg, PA 17106-9523

RE: Regulation #16A-724 (IRRC #3203)

I am a licensed massage therapist in Pennsylvania, practicing since 2001. I would like to comment on the proposed fee increases for massage therapists. I am most concerned about the increase in the biennial renewal fee from \$75 to \$200. First of all, this nearly triples the cost. It is hard to imagine the justification for such steep increase. Secondly, \$200 is well above the national average for renewal fees: the average is approximately \$139 for two years. The proposed increase for Pennsylvania is simply unreasonable.

I believe this increase will pose a hardship for many massage therapists. Most massage therapists are self-employed and do not have a guaranteed or stable income. Many are part-time, and even full-time therapists typically earn less than the annual mean wage for all occupations in PA. Additionally, we have other expenses associated with licensure, in particular the cost of continuing education. Here too, we will likely see an increase in costs as continuing education providers pass their fee increases on to massage therapists.

The massage therapist plays a unique and valuable role in the health and wellness sector. It makes sense to strengthen and promote the profession rather than dissuade those with the interest and skills. It is also valuable to society to promote professions, such as massage therapy, that offer flexibility for the working parent. Exorbitant fee increases will discourage new practitioners from entering the field, and current practitioners from continuing; and to the extent that these added costs are passed on to the consumer, will discourage patronage by the public.

Elaine Dellande, LMT

