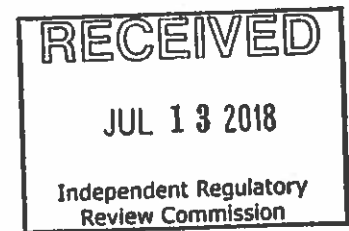


# 3203

**From:** R J Gasper  
**To:** ST\_RegulatoryCounsel  
**Subject:** Comments submitted for Regulation #16A-724 (IRRC #3203)  
**Date:** Thursday, July 12, 2018 8:51:09 AM



I oppose the current proposed increase from \$75 to \$200 biannually re: Regulation #16A-724 (IRRC #3203).

I would like to see detailed financial reports added to the <http://www.irc.state.pa.us/regulations/RegSrchrslts.cfm?ID=3214> website for public review to understand why the board is operating at such a large deficit.

Regarding the proposed renewal increase:

There are a large number of part-time employed massage therapists in this profession and most working for straight commission from their employers (hopefully with a commission rate somewhere between 40-70%).

In this field it is not common to receive sick pay, vacation pay, health insurance or any other employer benefits. And like many massage therapists, I am solely responsible for my licensing fees, CPR renewals, personal liability insurance, continuing education fees and travel. .

For our local area average cost of an hour massage is \$60. (We researched our local prices in March 2018.)

A part time therapist working 50 weeks a year performing 10-15 sixty-minute massages a week at 50% commission will make under \$ 19,000 annually **before taxes.**

In this scenario, a part time therapist could be bringing home a net of \$1350 per month.

**Current Yearly expenses:**

- \$ 239.00 for liability insurance (annual)
- \$ 37.50 current biannual fee (divided annually)
- \$ 250.00 - 12 CEUS (just divided in half - this is a LOW estimate)
- \$ 150.00 - One night Hotel stay due to out of home area courses (annual)

- \$ 45.00 - CPR (divided annually)

Maintaining License Requirements:  
\$721.50 yearly / \$1442 biannually

With the proposed rate increase to \$200/biannually license fee:  
\$784 yearly / \$1568 biannually

Before taking into account the costs of health insurance and retirement savings, neither of which are employer-provided to most massage therapists, the therapist working at 50% commission will perform their first forty-eight massages to meet the minimum cost requirements for license and insurance.

There are plenty of employers that do not offer or cannot afford to assist with the expenses of licensing, liability insurance and continuing education. For small businesses, the owner may also have their own massage therapy license requirements to meet!

I strongly urge the board to reconsider this large increase and look for areas to cut costs internally that do not directly benefit the massage therapists or the massage therapy profession. Without the review of the detailed financial reports, we simply do not have enough information to approve of such a drastic increase.

Jessica Gasper  
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