

From: Karen Bond
To: ST. Regulatory Counsel
Subject: Regulation #16A-724 (IRRC #3203)
Date: Sunday, July 22, 2018 6:44:43 AM

3203

Jacqueline A. Wolfgang, Assistant Counsel

Department of State

P.O. Box 69523

Harrisburg, PA 17106-9523



Karen Bond RN, LMT

DATE: 07/22/2018

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

Dear Ms. Wolfgang,

My name is Karen Bond. I am a Pennsylvania State licensed Massage Therapist and Registered Nurse.

I am emailing to express my deep concern and strong opposition to the increases in licensing fees and other costs proposed by the Massage Therapy Board and respectfully asking the Board to make every effort to attempt to cut operation costs as much as possible or seek other avenues of raising revenue for operating costs first before raising licensing fees.

As you know, all Massage Therapists in Pennsylvania are required to attain 24 ceu's in the biennial period. I support continuing education and believe it is an important requirement for any professional. Continued training helps us all maintain a level of skill and knowledge which helps provide clients with excellent care.

Many Massage Therapists work autonomously and independently. To meet the required standards of education one must take time off from working, resulting in lost income, and costs for the classes. These classes cost several hundred dollars and sometimes more.

As therapists, our work is physically demanding and maintaining a practice difficult. Client recruitment and retention can be costly as well and health insurance very expensive to purchase independently.

As therapists in Pennsylvania, another option for employment to an independent practice is a chain massage business like "Massage Envy" or "Hand and Stone", however; the pay is very low, averaging only \$15.00 per hour or less and the pace, very strenuous and occasionally abusive, asking the employed therapist to see six or more clients a day with turnover every 50 minutes. Many of my colleagues have sustained repetitive motion injuries through these places of employment, thus shortening their careers. One last option for massage therapist in Pennsylvania are Chiropractor offices, but again this can be chair massage every 15 minutes with low pay.

As the Board, I am sure you are very aware of the costs associated with practice, as well as options for employment for massage therapist. I respectfully remind you of these important issues because any additional costs for therapists can be a hardship and deterrent to licensure and practice.

My personal belief is that if the proposed increases are passed, less people will pursue a career as a Massage Therapist in Pennsylvania, more licensed therapist will surrender their license and not renew it, choosing other careers, and older therapists will simply retire early. It is very easy these days to obtain any unskilled job for \$15.00 per hour with no real requirements and full benefits so a large number of people will no longer seek a career as a Massage Therapist.

The proposed increase to help provide the Board with more operating costs will be counterproductive and in the long run, as massage therapists stop practicing by choosing other careers, and less new therapists come into the field. Your operation costs will increase just simply because less massage therapists will be paying for a license.

The proposed increase from \$75 to \$200 is 2.6 times the current amount

and the increased fee for continuing education will be an additional burden on any massage therapy business.

I understand that cost increases are necessary from time to time; however, I would ask you to consider finding other avenues to bring in the funding or more reasonable increases.

Thank you,

Karen Bond RN, LMT