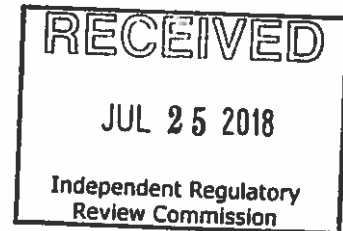


From: Patti Grabowski
To: ST. Regulatory Counsel
Subject: Proposed Increase In Massage Therapy Licensing Fees
Date: Sunday, July 15, 2018 2:32:20 PM

July 14, 2018

3203

Ms. Jacqueline Wolfgang, Assistant Counsel
Department of State
P.O. Box 69523
Harrisburg, PA. 17106-9523



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

Dear Ms. Wolfgang,

I am writing in regard to the above proposed legislation that would increase the biennial license renewal fee for Massage Therapists from \$75 to \$200 (an increase of 266.6%), the initial/new license fee from \$65 to \$100 (an increase of almost 100%), and continuing education course approval for providers from \$65 to \$100 (again, an increase of almost 100%). As a Licensed and Board Certified Massage Therapist I am opposed to this legislation on many levels, and generally feel the increases are excessive.

I understand that there are certainly costs involved in processing licences/license renewals and maintaining records and databases; however, am I to believe that these costs have increased so dramatically as to warrant fee increases of 100-266%? Are these proposed fees in keeping with those of other Pennsylvania state licensing boards? If they are higher, how is that justifiable; and if they are in keeping with them, has the disparity of income and income potential between Massage Therapists and other state-licensed, health-related fields been taken into consideration?

Massage Therapy is generally not a high-income profession. While we are categorized as healthcare professionals and conduct ourselves as such, we do not enjoy the same recognition as others in the healthcare field, as most insurance companies do not cover or reimburse massage-related expenditures. A great number of us are self-employed, meaning we shoulder a larger burden in income tax, while not receiving any benefits like employer-provided healthcare, paid vacations and sick/personal days, or unemployment compensation. Those MT's that are on the payroll of a spa, salon or massage franchise, seldom receive a living wage, and often only work part-time, again receiving no employer-provided benefits. Yet, we are required to pay for licenses, liability insurance (and association membership dues in order to get liability insurance), high continuing education costs (which also often includes travel expenses - gas, meals, and overnight accommodations, especially for those in more rural areas of the state, since 16 of the 24 CE's required must be taken in person - as well as lost income for the time taken to attend them), space rental and utility costs, and equipment and supplies. New MT's have all of this to contend with in addition to school loans to repay, as they struggle to build a regular clientele to support themselves in their new profession.

Some Massage Therapists look to supplement their income by moving into teaching, not only for the additional income, but to give their bodies a break from the physical demands of the job. These Continuing Education Providers must then also pay a continuing education course approval fee for each course they teach, so that the State will recognize the validity of the course toward their students' CE requirements. The proposed fee increase will almost certainly be passed on to the current cost of CE courses, which, as previously stated, are already high.

Taking all of this into consideration, I respectfully request that the Board re-examine the fee increases of this

proposed legislation and vote against it. Moving forward I would suggest that the Board propose legislation containing a more modest and equitable fee structure that while helping to offset administrative costs, will also remain affordable for the hard-working Massage Therapists in the State of Pennsylvania.

Sincerely,

Patricia Grabowski, LMT, NCTMB