

3203

From: M Schlener
To: ST_RegulatoryCounsel
Subject: Regulation #16A-724 (IRRC #3203)
Date: Tuesday, July 24, 2018 7:29:08 PM



Regulation #16A-724 (IRRC #3203)

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

Email: RA-STRegulatoryCounsel@pa.gov

Ms. Wolfgang and the Pennsylvania Board for Massage Therapy,

I have received notification that the Board has proposed an increase in the Pennsylvania State License for Massage Therapy from \$75 to \$200 every two years. I am writing to ask that you please reconsider this proposal.

"The Board's purpose is to safeguard the public from harm caused by unqualified persons; to assure the highest degree of professional care and conduct on the part of massage therapists; and to assure the availability of massage therapy services of the highest quality to persons in need of such services."

I have been a licensed massage therapist for almost a decade. The majority of LMT's (including myself) are part time employees and/or independent contractors. I pay for the required continuing education, massage insurance, a massage license, clothes, supplies, as well as other miscellaneous workshops to better myself in my career. That amount comes out to about \$1,000-\$1,500/2yrs. I am expected to pay for these things on my humble salary (not to mention cost of living wages, private insurance, and taxes) in order to keep my license. LMT's are not doctors, however, this proposal is suggesting we pay the fees as some doctors do. I feel that this price increase is indeed unfair and will deter qualified, responsible, and seasoned massage therapists from continuing their careers or even beginning their careers. If we lose hard-working health care professionals due to astronomical license fee increases, then I consider that a tragedy not only for the profession of massage therapy, but for the communities that those therapists care for.

I am also a former board president for a non-profit business. If any business or board is in a deficit of \$1,058,603.88, then it is a problem

related to management and delegation not the responsibility of my fellow therapists. I have reviewed the board's meeting notes and I find that there are quite a few things that could be improved to create a more well balanced structure, rather than scraping the pockets of therapists. I understand that there are unqualified people that abuse the licensing system. However, raising the fees is not necessarily a proactive way of extracting these people or business' from our communities.

I have compiled a list of simple solutions that would be much more appealing to professional licensed massage therapists:

- With this deficit, the board should be meeting at least once a month if not twice a month to resolve this issue a different way. Not every other month.
- Finances should be reviewed at every board meeting to ensure that things are on track instead of waiting for the fiscal year to end. This also allows other board members to prepare proposals more suitable for review.
- If the board is concerned about illegal activities or participants regarding PA LMT licensure, then the state board should work on increasing those illegal fines as well as providing LMT's with training on identifying and reporting illegal activity. For example: Asking people to report child abuse does not stop child abuse, however, providing free training on reporting child abuse can/does make a tremendous impact on those cases.
- Drop the 24 hours of continuing education to 6-8 hours and require LMT's to pay the \$200 every two years. Required courses would include CPR, Ethics, and Child Abuse Reporting. If Therapists choose to take CEU's then those hours can roll over into future years, or even go towards a certified program where therapists could work towards new and interesting certified teaching programs. There are only so many times a therapist can take Myofascial release so one could even consider to put a cap on CEU's earned after a certain number of years practicing.
- Keep things the same and shift the management focus as to not

continue the same financial mistakes.

I hope this letter provides some insight into how this would affect me and other Pennsylvania Massage Therapists.

Feel free to contact me if you have any questions about my suggestions.

Sincerely,

Marcie Albertson LMT

<u>STATE</u>	<u>AVG HRLY WAGE</u>	<u>AVG. SALARY</u>	<u>MIN HRLY WAGE</u>	<u>MIN SALARY</u>
ALABAMA	13.44	\$27,960.00	8	16640
ALASKA	41.47	\$86,260.00	29.86	62100
ARIZONA	18.95	\$39,420.00	8.53	17750
ARKANSAS	15.07	\$31,340.00	8.85	18420
CALIFORNIA	18.34	\$38,140.00	8.9	18500
COLORADO	20.59	\$42,830.00	8.58	17840
CONNECTICUT	17.79	\$37,010.00	8.65	18000
DELAWARE	29.27	\$60,880.00	14.09	29320
DC	15.35	\$31,930.00	9.74	20270
FLORIDA	17.79	\$37,010.00	8.95	18620
GEORGIA	19.64	\$40,850.00	10.07	20940
HAWAII	17.71	\$36,840.00	8.38	17420
IDAHO	19.1	\$39,720.00	9.06	18850
ILLINOIS	17.09	\$35,540.00	9.08	18880
INDIANA	17.52	\$36,430.00	8.68	18060
IOWA	16.62	\$34,570.00	8.2	17060
KANSAS	16.25	\$33,800.00	8.23	17110
KENTUCKY	17.56	\$36,520.00	9.99	20770
LOUISIANA	15.33	\$31,880.00	8.55	17780
MAINE	19.36	\$40,280.00	9	18720
MARYLAND	20.83	\$43,330.00	8.52	17720
MASSACHUSETTS	20.48	\$42,600.00	10.27	21360
MICHIGAN	18.1	\$37,640.00	8.25	17160
MINNESOTA	18.62	\$38,730.00	8.81	18320
MISSISSIPPI	12.16	\$25,300.00	8.26	17180
MISSOURI	16.2	\$33,700.00	8.47	17610
MONTANA	17.53	\$36,460.00	9.39	19530
NEBRASKA	14.07	\$29,270.00	7.99	16610
NEVADA	12.96	\$26,950.00	7.72	16060
NEW HAMPSHIRE	22.48	\$46,760.00	10.63	22120
NEW JERSEY	15.57	\$32,380.00	8.2	17050
NEW MEXICO	20.66	\$42,980.00	10.89	22640
NEW YORK	25.62	\$53,300.00	11.6	24130
NORTH CAROLINA	21.1	\$43,890.00	10.03	20860
OHIO	16.48	\$34,280.00	8.47	17620
OKLAHOMA	13.75	\$28,590.00	7.9	16440
OREGON	24.09	\$50,110.00	11.05	22990
PENNSYLVANIA	21.85	\$45,450.00	8.27	17200
SOUTH CAROLINA	15.44	\$32,100.00	8.39	17450
SOUTH DAKOTA	15.81	\$32,880.00	12.64	26290
TENNESSEE	17.34	\$36,070.00	8.45	17580
TEXAS	17.9	\$37,230.00	8.41	17500
UTAH	15.88	\$33,030.00	8.35	17370
VERMONT	29.19	\$60,700.00	14.14	29410
VIRGINIA	22.58	\$46,970.00	10.8	22460
WASHINGTON	26.02	\$54,110.00	16	33280

WEST VIRGINIA	15.22	\$31,650.00	8.44	17550
WISCONSIN	17.32	\$36,060.00	8.34	17350
WYOMING	18.58	<u>\$38,640.00</u>	9.97	20730
		\$40,216.04		

AVERAGE YEARLY SALARY

FIGURES COURTESY OF US DEPT OF LABOR OCCUPATIONAL EMPLOYMENT & WAGES DATABASE

37.50 PA YEARLY AVERAGE for license

68.34 YEARLY AVERAGE for license

<u>STATE</u>	<u>AVG HRLY WAGE</u>	<u>AVG. SALARY</u>	<u>MIN HRLY WAGE</u>	<u>MIN SALARY</u>
MAINE	19.36	\$40,280.00	9	18720
GEORGIA	19.64	\$40,850.00	10.07	20940
MASSACHUSETTS	20.48	\$42,600.00	10.27	21360
COLORADO	20.59	\$42,830.00	8.58	17840
NEW MEXICO	20.66	\$42,980.00	10.89	22640
MARYLAND	20.83	\$43,330.00	8.52	17720
NORTH CAROLINA	21.1	\$43,890.00	10.03	20860
PENNSYLVANIA	21.85	\$45,450.00	8.27	17200
NEW HAMPSHIRE	22.48	\$46,760.00	10.63	22120
VIRGINIA	22.58	\$46,970.00	10.8	22460
		\$43,594.00		

AVG YEARLY SALARY

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	<u>LICENSE COST</u>	<u>YEARS</u>	<u>YEARLY</u>
NORTH DAKOTA	\$100.00	1	100
RHODE ISLAND	\$65.00	1	65

<u>LICENSE COST</u>	<u>YEARS</u>	<u>YEARLY</u>	<u>CEUS</u>	<u>YEARS</u>
\$100.00	2	50	16	2
\$60.00	2	30	16	2
\$95.00	2	47.5	25	2
\$30.00	1	30	18	2
\$150.00	2	75	0	2
\$79.00	2	39.5	0	2
\$255.00	2	127.5	24	4
\$123.00	2	61.5	24	2
\$177.00	2	88.5	12	2
\$105.00	2	52.5	24	2
\$75.00	2	37.5	24	2
\$146.00	2	73	0	2
\$75.00	1	75	6	1
\$175.00	2	87.5	24	2
\$150.00	4	37.5	0	4
\$120.00	2	60	16	2
\$75.00	2	37.5	0	0
\$100.00	2	50	24	2
\$125.00	1	125	12	1
\$40.00	1	40	0	1
\$276.00	2	138	24	2
\$150.00	1	150	0	1
\$225.00	3	75	0	3
\$0.00	0	0	0	0
\$200.00	2	100	24	2
\$100.00	2	50	12	2
\$90.00	1	90	12	2
\$110.00	2	55	24	2
\$295.00	1	295	12	1
\$100.00	2	50	12	2
\$120.00	2	60	20	2
\$125.00	2	62.5	16	2
\$103.00	3	34.34	36	3
\$100.00	2	50	24	2
\$50.00	2	25	0	2
\$50.00	2	25	16	2
\$155.00	2	77.5	25	2
\$75.00	2	37.5	24	2
\$175.00	2	87.5	12	2
\$65.00	1	65	8	2
\$195.00	2	97.5	24	2
\$106.00	2	53	12	2
\$52.00	2	26	0	2
			0	0
\$95.00	2	47.5	24	2
\$106.00	1	106	24	2

\$200.00	2	100	24	2
\$53.00	2	26.5	24	2
			24	2
		\$ 69.76		
\$139.52 EVERY TWO YEARS AVERAGE				

<u>LICENSE COST</u>	<u>YEARS</u>	<u>YEARLY</u>	<u>CEUS</u>	<u>YEARS</u>
\$40.00	1	40	0	1
\$75.00	2	37.5	24	2
\$150.00	1	150	0	1
\$79.00	2	39.5	0	2
\$125.00	2	62.5	16	2
\$276.00	2	138	24	2
\$100.00	2	50	24	2
\$75.00	2	37.5	24	2
\$100.00	2	50	12	2
\$95.00	2	47.5	24	2
\$111.50		65.25	14.8	
AVG LICENSE COST		YRLY AVG LICENSE COST	AVG CEUS PER TERM	

<u>CEUS</u>	<u>YEARS</u>
\$24.00	2
\$0.00	1