

Note: As alluded to in the original member email and CAMTC Process Synopsis document, the public was only allowed 2 minutes to remark on the proposed 50 percent increase in licensing fees for California massage therapists. Following are ABMP Chairman Bob Benson's intended comments if he were allowed 5 minutes to speak.

Intended Remarks on CAMTC 2023 Budget and Fee Levels
Bob Benson, Chairman, ABMP
November 29, 2022

The California Massage Therapy Council (CAMTC) Bylaws charge you, members of the CAMTC Board of Directors, with setting “initial and renewal fees that are reasonably related to the costs of providing services and carrying out the ongoing responsibilities and duties of the Council.”

What is being proposed today—an increase in initial and renewal fees to \$300—is unconscionable. Alternatively, this Council should take a hard look at achievable efficiencies and move fees back toward the original \$150 level.

You have in front of you a study by Capital Accounting Partners (CAP) showing numerous calculations and a conclusion that \$300 is the merited fee level. How convenient: This is exactly the figure your management team tried to achieve three years ago. Combining this study with another one by CAP last spring—projecting costs of licensing massage therapists by using chiropractors as a point of comparison even though that profession is one-quarter the size of the California massage therapist population—illustrates that the firm failed to compare California massage activity to the most relevant other states and allied health professionals. For fee-setting, comparisons should be to states with large massage populations rather than geographic proximity.

Here should be four key considerations:

1. Scale matters. It should be more efficient to handle applications and disciplinary functions in states with large numbers of therapists. It is more expensive to create all the functions and rules to regulate massage in states with few therapists.

Two-year massage license renewals in Florida and Texas—two states that also have many massage therapists—cost \$105 and \$75, respectively. Only four states—Alaska, Connecticut, Maryland, and Nevada—charge more than \$200 and the average number of licensees in those states is only 3,600 versus 50,000 individuals under CAMTC’s purview.

2. Scope of activity matters. In your Bylaws Article III Purposes and Limitations, there’s language about working with law enforcement on “vetting and disciplining certificate holders,” but nothing about solving human trafficking. What has occurred is mission creep—three-quarters of a million dollars a year trying to solve human trafficking, carrying

an outreach director position despite not being able to meaningfully grow the number of certified therapists for many years, and huge legal costs (proposed to be over \$800,000 in 2023 including benefits). That's a lot in relation to 180 complaints a year against certificate holders.

3. Efficiency and reasonableness matter. CAMTC already is the most top-heavy state massage organization in the US—paying out approximately \$1.2 million in salaries and benefits in 2021 to its six most highly paid employees. The proposed 2023 budget would add \$657,000 to “**start** assembling a strong executive management team” (emphasis added). Quite a statement 12 years in. The inference is that Ahmos Netanel at \$500,000 a year can't do the leadership job without hiring an expensive chief operating officer (COO). CAMTC already has Jon Walters doing an excellent job leading the applications function, Michael Marylander superbly performing as a watchdog on financial matters, and much high-priced talent leading the disciplinary function.

4. There's relevant experience here. The same day in early 2010 that Mr. Netanel was hired as CEO, Jill Epstein, a lawyer with a background in association management, was hired as COO. Mr. Netanel either wasn't motivated to make that relationship work or was unable to utilize Jill's talents and experience. She left a bit over a year later to become CEO of the 32,000 member California Association of Marriage and Family Therapists. Today she serves as the first female CEO of IIABCal, an organization comprised of 14,000 independent insurance agents. Why should Mr. Netanel be entrusted to hire a COO again? If he cannot perform the CEO job, cut his compensation to cover pay for a COO and let that person handle CAMTC's purposes described in its Bylaws.

Finally, how does CAMTC propose to pay for this new expense? On the backs of California massage therapists who earn on average \$25,000 per year from massage work. ABMP supports a return toward \$150 initial and renewal fees. If CAMTC will stick to its defined purposes, it should be able to do an excellent job protecting the public at that fee level.