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 Government Relations Director Laura Embleton's intended comments if she were allowed even 3 minutes to speak.

## Intended Remarks on CAMTC 2023 Budget and Fee Levels Laura Embleton, Government Relations Director, ABMP November 29, 2022

I am Laura Embleton, government relations director for Associated Bodywork & Massage Professionals (ABMP). ABMP has over 80,000 members nationwide with over 9,000 members in California.

The California Massage Therapy Council (CAMTC) is proposing to raise fees \$100, as is noted in the Board packet on page 136. This is a 50 percent increase. The Key Assumptions for the increase indicate a desire to "start assembling a strong executive management team," a most surprising statement 12 years after CAMTC's current CEO assumed that position. The 2022 budget shows certifications generate approximately \$5 million of income annually. This income is much higher than the income of any other massage therapy boards across the country.

CAMTC's initial and renewal certification fee is \$200, while the most common initial/application state fees for other boards are between \$100 and \$120, and the most common renewal fees are between \$60 and \$100. Compared to California, other states have much smaller massage therapist populations and therefore lesser economies of scale.

The 2023 CAMTC proposed budget would balloon income to over \$7 million between certifications and renewals—a \$2 million increase on an annual basis. Based on the statements made in CAMTC's 2021 Sunset Report, this seems unnecessary and contradictory. In that document, CAMTC stated, paraphrasing, that boards and bureaus struggle but CAMTC is solvent as it has "more than appropriate level of reserves." The response goes on to state that the only area where fees are lacking is schools. CAMTC prides itself for its exorbitant budget and the work they do.

CAMTC staff is consistently compensated more for their services than any other state massage regulatory body across the country. It is unconscionable to raise fees to hire more senior management in an organization that is already top-heavy.

In addition, CAMTC hosts conferences and events that cost a lot. No other massage board in the country spends licensee fees on events such as these.

Finally, CAMTC was created to regulate the massage therapy profession in California. It appears that hosting events and working more in the realm of human trafficking has

caused the council to shift their focus from their initial purposes outlined in the Massage Therapy Act. The cost of this movement away from original purposes should not be borne by certified massage therapists in California, most of whom practice lawfully with no encumbrances against their license. Let's not penalize law-abiding massage therapists with a fee increase.

For these reasons, and on behalf of the thousands of ABMP members in California, we cannot support a proposed fee increase at this time.