

April 13, 2016

Economic Affairs Interim Committee
Montana Legislative Services Division
P.O. Box 201706
Helena, MT 59620

RE: SB 390 - Interim Study of Department of Labor and Industry Fees

Dear Chairman Lynch and Committee Members:

I am licensed as a Registered Sanitarian in the State of Montana, a credential required by the State of Montana for me to perform my job duties. I am writing to voice my concerns as they relate to your study bill.

1. In the interest of public protection, the Montana Legislature established the requirement that sanitarians must obtain a state license in order to conduct health inspections and other job duties. No monies are allocated from the general fund in support of this public protection. Each individual sanitarian must bear the full cost of the license, despite an annual earning capacity approximating \$39,000 to \$58,000. Even when the employer bears the cost for the license fee, this shifts funds away from supporting continuing education or providing direct services to the public.

I am also licensed as a Nutritionist in Montana, under the Board of Medical Examiners. Licensed Nutritionists in Montana are similar in number to Registered Sanitarians and have similar earnings. I pay a fee of \$150 every two years for my Nutritionist's License, in contrast to the \$270 each year for a Sanitarian's License.

I urge you to consider decreasing the cost of licensure to the individual sanitarian.

2. The services provided by the Board of Sanitarians add little value to the profession. The burden of documenting that licensure requirements are met fall on the applicant. The applicant must pay a fee with the licensure application; he must order and pay for college transcripts to be delivered directly to the Board and he must pay a fee to take a registration exam which is developed, scored and managed by the National Environmental Health Association, not the Montana Board of Sanitarians. The Board adds no value to this process.
3. The service provided by the Board of Sanitarians do little to protect the public. I am unaware of any audits conducted that assess the integrity and quality of the work of sanitarians in Montana. The Board conducts random audits to verify that continuing education requirements are met, but does not consider their relevance to assigned work.

Liability for sanitarian misconduct would most often fall on the county or state employer, not on the state licensing board.

I urge the committee to consider 1) how administrative and legal costs could be reduced and/or eliminated in order to reduce the overall licensure fee to registered sanitarians and 2) alternative funding to help offset the costs of licensure.

Sincerely,

A handwritten signature in cursive script that reads "Marilyn Tapia". The signature is written in black ink and is positioned above the typed contact information.

Marilyn Tapia, REHS/RS
RiverStone Health
123 South 27th St
Billings MT 59101
Marilyn.tap@riverstonehealth.org