

April 8, 2016

Attn: Ms. Patricia Murdo  
Economic Affairs Interim Committee  
Montana Legislative Services Division  
P.O. Box 201706  
Helena, MT 59620-1706

**RE: SB390 – Interim Study of Department of Labor & Industry Fees**

Dear Members:

I wish to provide input on your committee study of the current and projected fees charged by the Montana Department of Labor & Industry (MDOL). My comments will be specifically directed toward the Board of Sanitarians and their present licensing fees.

I have been licensed as a Sanitarian (Environmental Health Specialist) since 1991, and practicing the profession as a county/Board of Health employee of Gallatin County since 1992. Until MDOL was directed to become more fee supported our licensing fees were relatively modest.

I totally understand the rationale presented by MDOL and the need for them to cover the work they do. But I ask that you consider ways of fee supporting our Board licensure in some fashion because of the following:

- By State law, sanitarians must be licensed to do our inspecting jobs.
- Our jobs – inspections of restaurants, pool & spas, etc. – are also mandated by State law. County governments cannot opt out of inspections (MT Attorney General Opinion – Vol. 46, Opinion 3).
- Gallatin County does not contribute to licensing fees: few, if any, counties do.
- Environmental Health Specialists have a modest salary compared to nurses or engineers who pay much, much, less Board licensing fees.
  - Example – physicians pay \$500 every *two* years
  - Example – nurses pay \$100 every *two* years
  - Example – engineers pay \$50 every *two* years

In summary, Sanitarians I've talked to are desirous of Board oversight due to our required education and job responsibilities. Some smaller counties need a Board to provide recourse should a Sanitarian not act professionally. We are willing to pay a reasonable fee for that service – but our \$270 per year fee is among the highest required and our ability to pay is not commensurate.

Thank you for your work in this difficult area and for allowing me to express my opinions.

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