

LCB File No. R148-03

**PROPOSED REGULATION OF THE
STATE BOARD OF HEALTH**

NAC 457.295 Fees for certificates. The health division shall charge and collect the following nonrefundable fees:

1. For the issuance or renewal of a certificate for a machine, \$500.
2. For the issuance or renewal of a mammographer's certificate, ~~[\$40]~~ **80**.
3. For the issuance *or renewal* of a certificate to provide training to mammographers pursuant to [NAC 457.357](#), \$100.
- ~~4. For the annual renewal of a certificate to provide training to mammographers pursuant to [NAC 457.337](#), \$50.]~~

LCB File No. R148-03

**PROPOSED REGULATION OF THE
STATE BOARD OF HEALTH**

Small Business Impact Statement

Nevada Administrative Code 457 – Mammography Fee Increases

Mammography Certificate Category	Responses
Certified Mammographers	3
Certified mammography facilities	2
Other commenters	0
Certified persons to provide training	0
Total responses:	5
Total mailed: approx. 340	

Interested parties can obtain a copy of the information packet, including the Small Business Impact Questionnaire sent to all recipients, from Stanley R. Marshall, Supervisor, Radiological Health Section, Bureau of Health Protection Services, Nevada State Health Division, 1179 Fairview Drive, Suite 102, Carson City, NV 89701.

The costs to current and proposed costs to obtain/renew a certificate for conducting mammography services as a technologist at a mammography facility, to certify a mammography X-ray machine or to provide mammography training services is indicated in the table below:

<u>Certificate Type</u>	<u>Current start-up Fee</u>	<u>Proposed start-up Fee</u>	<u>Current Renewal Fee</u>	<u>Proposed Renewal Fee</u>
Mammographer	\$40 for 3-year certificate	\$80 for 3-year certificate	\$40 for 3-year certificate	\$80 for 3-year certificate
Mammography Machine	\$500 per year	No change	\$500 per year	No change
Person to provide mammography training	\$100 per year	No change	\$50 per year	\$100 per year

The proposed fee increases are expected to have both direct and indirect beneficial economic effect on mammographers, mammography facilities and persons providing mammography training services, in that collection of the proposed fees will allow the Radiological Health Section to continue to perform state certification activities in a timely manner pursuant to Nevada Revised Statute 457.

Summary of comments from mammography certificate holders:

Question #2: Will a specific regulation have an adverse economic effect upon your business?

<u>Certificate Type</u>	<u>YES</u>	<u>NO</u>
Mammographer	3	0
Mammography Machine	2	0
Person to provide mammography training	0	0

Comments regarding Question #2:

Sample of “YES” Responses from commenters:

Mammographers:

This cost burden falls totally on the mammographer may be forced to cancel renewing the certificate.

Mammography Facilities:

Any increase in fee is always prohibitive to facilities small facilities doing mammography in rural Nevada . . . having problems staying afloat anyway.

Smaller facilities may be forced to discontinue offering mammograms to the general public

Persons to provide mammography training:

No responses.

Sample of “NO” Responses from health care providers:

Mammographers:

No responses.

Mammography Facilities:

Mammographers’ fee increase; exceeding financial abilities of facility.

Persons to provide mammography training:

No responses.

Question #3: Will the regulation have any beneficial effect upon your business?

<u>Certificate Type</u>	<u>Yes</u>	<u>No</u>
Mammographer	0	3
Mammography Machine	0	2
Person to provide mammography training	0	0

Comments regarding Question #3:

Sample of “YES” Responses from commenters:

Mammographers:

Same as #2 – yes above.

Mammography Facilities:

Same as #2 – yes above.

Persons to provide mammography training:

No responses.

Sample of “NO” Responses from health care providers:

Mammographers:

No responses.

Mammography Facilities:

Same as #2 –no above.

Persons to provide mammography training:

No responses.

Question #4: Do you anticipate an indirect adverse effects upon your business?

<u>Certificate Type</u>	<u>YES</u>	<u>NO</u>
Mammographer	3	0
Mammography Machine	2	0
Person to provide mammography training	0	0

Comments regarding Question #4:

Sample of “ YES” Responses from commenters:

Mammographers:

Same as #2 – yes above.

Mammography Facilities:

Same as #2 – yes above.

Persons to provide mammography training:

No responses.

Sample of “NO” Responses from health care providers:

Mammographers:

No responses.

Mammography Facilities:

No responses.

Persons to provide mammography training:

No responses.

Question #5: Do you anticipate an indirect beneficial effects upon your business?

<u>Certificate Type</u>	<u>YES</u>	<u>NO</u>
Mammographer	1	2
Mammography Machine	0	2
Person to provide mammography training	0	0

Comments regarding Question #5:

Sample of “ YES” Responses from commenters:

Mammographers:

I understand the need to raise fees at this time when the state budget is underfunded.

Mammography Facilities:

No responses.
Persons to provide mammography training:
No responses.

Sample of “NO” Responses from health care providers:

Mammographers:

Same as #2- no above.

Mammography Facilities:

Same as #2 – no above.

Persons to provide mammography training:

Same as #2 – no above.