

FEE REPORT FORM
Annual Registration of Radiation-Producing Machines

Environmental Protection / Radiation Protection
 Agency

November 13, 2007
 Date

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	<u>2006</u>	<u>2007 est.</u>	<u>2008</u>	<u>2009</u>
FEE COLLECTIONS:				
Current	\$2,794,937	\$2,631,755		
Proposed			\$3,731,475	\$3,731,475

FEE TITLE AND RATE:

Current	25 PA Code 218.11(a), Annual registration fees for radiation-producing machines.
Proposed	25 PA Code 218.11(a), Annual registration fees for radiation-producing machines.

See attached summary table for fee details for rates.

FEE OBJECTIVE: Per the Radiation Protection Act of 1984, establish and collect fees sufficient to cover costs of registering and periodically inspecting radiation-producing machines and establishing, reviewing, and revising regulations for the safe use of such equipment within the context of a comprehensive program.

FEE RELATED ACTIVITIES AND COSTS

1. Department has to operate a management system registration of about 30,000 X-ray machines in 11,000 facilities.
2. Establish appropriate regulations for use of X-ray machines including recommended radiation safety procedures.
3. Periodically and on demand inspect facilities for compliance with regulations.
4. Technical and legal investigation of violations and allegations as needed.
5. Special staff training and equipment.
6. Supervisory and management time.

ANALYSIS:

The use of X-ray machines is ubiquitous and expanding in technical complexity thereby taxing the regulators' ability to keep regulations and specialized inspector training and survey equipment and procedures up to date. The current fees are no longer adequate to support the level of inspection

program needed. Based on a comprehensive workload analysis of the Radiation Control Program, the Department is proposing increases to the Radiation Control fees to cover program costs, including increases in salaries, benefits and operational expenses (including information technology, training, lab services and equipment costs). The figures below set forth the costs that are associated with the Radiation Control Program's annual registration and inspection of radiation-producing machines from the present date until 2011. The personnel costs are representative of the staff needed to register and inspect approximately 30,000 X-ray units in 11,000 facilities. Salary, benefit, operational expenses have been totaled and noted below. These personnel costs reflect a 30% increase from 2001 to 2007, and a mandated increase per the recent union contract of about 20% over the next four years.

As indicated in the table below, total costs associated with the Bureau of Radiation Protection's annual registration of radiation-producing machines for the next four years ranges from \$3.58M to 3.94M per year. The projected revenue of \$3.73M per year, beginning in 2008, will cover these costs.

Annual Registration of Radiation-Producing Machines - Anticipated Expenses

Anticipated Expenses	\$ Applicable to FY 07/08	\$ Applicable to FY 08/09	\$ Applicable to FY 09/10	\$ Applicable to FY 10/11
Personnel Costs	\$ 2,929,290	\$ 3,084,900	\$ 3,249,155	\$ 3,455,270
IT Charges (Including Computer Maintenance, eFACTS upgrades, etc.)	177,450	200,200	147,875	159,250
Specialized Equipment (Including Barracuda, Calibration Costs, etc.)	241,150	129,775	182,000	186,550
Specialized Training	154,700	154,700	91,000	64,000
Lab Services/Consultants	79,625	79,625	79,625	79,625
TOTAL	\$ 3,582,215	\$ 3,649,200	\$ 3,749,655	\$ 3,944,695

RECOMMENDATION AND COMMENT: Approve the proposed regulations. Advances in technology require continuing upgrade of expensive specialized survey instrumentation and continuing training of personnel. The Radiation Protection Advisory Committee (RPAC), which includes practitioners of medical disciplines that use X-ray machines, medical physicists, health physicists, medical technologists and industrial users, was consulted in the development of this regulation, and they recommend the proposed fee increase moving forward.

For simplicity, the regulation, 25 PA Code 218.11(a), summarizes the fee structure as follows;

Current:

Type of Facility	Annual Administrative Fee	Annual Fee per X-ray Tube or radiation generating Device
Dentists, podiatrists, veterinarians	\$70	\$35
Hospitals	\$520	\$35
Other Facilities	\$250	\$35

Proposed:

Type of Facility	Annual Administrative Fee	Annual Fee per X-ray Tube or radiation generating Device
Dentists, podiatrists, veterinarians	\$100	\$50
Hospitals	\$725	\$50
Other Facilities	\$350	\$50

Detailed Summary of Current and Proposed Annual Fees for Registration of X-Ray Machines

Type of Facility	Current Annual Registration Fees	Current Annual Fee for Each Tube	Current Number of Facilities	Number of Tubes	Estimated CY2007 Fee W/O Fee Increase	Prop. Annual Admin. Fee	Prop. Annual Fee Per Tube	Estimated Annual Fee Collection with Proposed Fees
Chiropractor	\$250	\$35	1234	1248	\$352,180	\$350	\$50	\$494,300
Clinic	\$250	\$35	515	1197	\$170,645	\$350	\$50	\$240,100
Dentist	\$70	\$35	5849	19820	\$1,103,130	\$100	\$50	\$1,575,900
Home	\$250	\$35	16	29	\$5,015	\$350	\$50	\$7,050
Hospital	\$520	\$35	239	5139	\$304,145	\$725	\$50	\$430,225
Industry	\$250	\$35	554	1516	\$191,560	\$350	\$50	\$269,700
Medical Doctor	\$250	\$35	747	1195	\$228,575	\$350	\$50	\$321,200
Osteopath	\$250	\$35	67	102	\$20,320	\$350	\$50	\$28,550
Other Medical	\$250	\$35	41	263	\$19,455	\$350	\$50	\$27,500
Other Non-Med	\$250	\$35	46	102	\$15,070	\$350	\$50	\$21,200
Podiatrist	\$70	\$35	639	692	\$68,950	\$100	\$50	\$98,500
Prison	\$250	\$35	42	159	\$16,065	\$350	\$50	\$22,650
School	\$250	\$35	85	748	\$47,430	\$350	\$50	\$67,150
Veterinarian	\$70	\$35	788	973	\$89,215	\$100	\$50	\$127,450
TOTALS					\$2,631,755			\$3,731,475