Economic Impact Analysis Fee Adjustment Report Radioactive Materials Program

WAC 246-254-030, 070, 080, 090, 100 & 120 April 2024



Proposal: To update and increase fees for Radioactive Material program anticipated effective date October 1st, 2024.

Overview

The Department of Health (department) works to protect and improve the health of all people in Washington State. We accomplish this work, in part, through regulation of the Radioactive Material program (<u>RCW Chapter</u> 70A.388 Nuclear Energy and Radiation).

State law, <u>RCW 43.70.250</u> (License fees for professions, occupations, and businesses) requires fees to fully fund the work of licensing and regulating the Radioactive Materials program. Considering the program's financial forecast, the department recommends a fee increase. The department is proposing changes to the fee schedule to remove unfunded discounts. These changes will align fees with full cost recovery.

We license and inspect all Radioactive Materials Facilities as required by law and are part of the National Materials Program (NMP). The NMP is a broad collective framework within which both the Nuclear Regulatory Commission and the agreement states function in carrying out their respective regulatory programs for radioactive material.

The program ended the 2023 calendar year with a fee balance of \$1,073,000. The reserve balance was maintained by extreme staffing shortages. The program currently holds one vacant position that we anticipate being filled by May 2024. The recommended fee reserve amount is \$632,000. The fee balance is currently projected to be operating at a deficit of the recommended reserve amount at the close of Fiscal Year (FY) 2024. This document summarizes data on revenue, expenditures, fee reserve, cost drivers, financial forecast, and the proposed fees.

Revenue

The department currently licenses approximately 350 Radioactive Materials licenses and 480 facilities in Washington State. Radioactive materials revenue comes from annual licenses fees. License fee rates vary widely and are grouped into four categories: specialized, medical, and veterinary, industrial and laboratory licensees.

Fees

License fees are billed annually based on the date of the original license. License fees range from \$189 – \$36,288 depending upon license type and average \$5,853 overall. There are 53 different fees depending on service and license. Three license categories have a second facility discount of 50% and all licenses have an option of 25% small business subsidy discount. There are approximately 120 licensees that are currently

receiving a 2nd facility, small business discount, or both. These discounts are unfunded. These entities will end up paying higher fees because the discounts are going away.

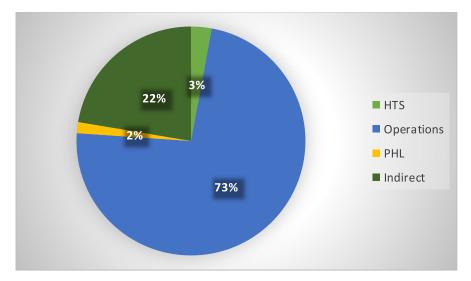
Revenue has been declining 3% annually over the last four years. This is due to a decrease in facilities. All fees are listed in $\underline{\text{WAC } 246-254-030}$, $\underline{070}$, $\underline{090}$, $\underline{100}$ & $\underline{120}$. The last fee changes that occurred in 2017 are listed in the table below.

WAC	Туре		Title of Fee		
WAO	турс	NUCLEAR PHARMACY	Single Nuclear Pharmacy	07/27/08 9,164	01/16/17 10,721
		NUCLEAR LAUNDRY	Single Nuclear Laundry	15,628	18,284
		LARGE MANUFACTURER	Single, more than 1 curie	15,628	18,284
		SMALL MANUFACTURER	Single, less than or = 1 curie	5,476	6,406
	Specialized Radioactive		redistribution	1,408	1,647
	Material License 1)	DECONTAMINATION	decontamination	10,484	12,266
	Special categories	WASTE BROKER	Waste brokerage	4,956	5,798
	Special categories	HEALTH PHYSICS		2,208	2,583
		CIVIL DEFENSE	physics service civil defense	2,208	3,032
					-
		N/A	special nuclear	780	912
WAC	Specialized Radioactive	BIG BROAD	atomic numbers 3-83 max possession isotope > 1 curie	31,016	36,288
246-254-070	Material License 2)	MEDIUM BROAD	atomic numbers 3-83 max possession isotope > .1 curie, less or = 1 curie	14,336	16,773
	Broad scope categories	SMALL BROAD	atomic numbers 3-83 max possession isotope less or = .1 curie	11,520	13,478
	Specialized Radioactive Material License 3) Licensed not covered by any licenses 070-100	OTHER NOT SPECIFIED	Initial Application, considered a credit against future billing	1,000	1,170
		N/A	Direct billing time @ \$189/hr. issuing and maintain license & services in WAC 246-254-120	400	400
		N/A		162	189
	Specialized Radioactive Material License 4) waste processing		non refundable initial application fee new license, credited toward qtrly billing		
		N/A		16,000	18,720
		N/a	Quarterly billing, actual billing for direct/indirect costs to dept	-	-
	n/a unsealed written directive required imaging and localization studies, directive no	MOBILE NUCLEAR MEDICINE	mobile nuclear medicine	7,748	9,065
		FULL DIAGNOSTIC	imaging and localization studies written directive not required	5,648	6,608
		n/a	unsealed written directive required	4,892	5,723
			imaging and localization studies, directive not required 246-		
		240-157, written directive is required 246-240-201, manual			
		THERAPY brachytherapy	brachytherapy	7,800	9,126
		MANUAL BRACHYTHERAPY	manual brachytherapy	4,192	4,904
WAC		HDR, GAMMA KNIFE, remote after loader unit, teletherapy, gamma stereotactic	remote after loader unit, teletherapy, gamma stereotactic		
246-254-080	Medical & veterinary	TELETHERAPY		2,592	3,032
246-254-080	Radioactive Materials	MEDICAL >200 mCi	bet greater than 200 millicuries	3,936	4,605
	Use	MEDICAL>30 -<200 mCi	vet greater than 30 millicuries	3,132	3,664
		MEDICAL<30 mCi	vet less than or = to 30 millicuries	2,992	2,681
			uptake, dilution/excretion studies written directive not required		
		n/a		2,020	2,363
		n/a	vet sealed source diagnostic	1,260	1,474
			The fee for a license authorizing multiple locations shall be		
			increased by fifty percent of the annual fee for each additional		
			location	50%	50%

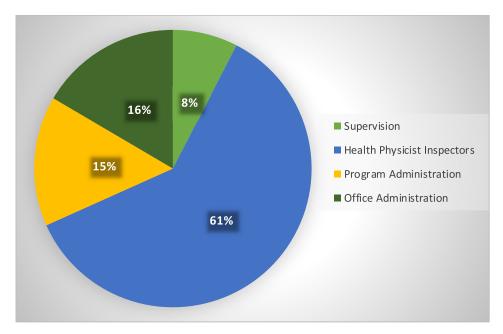
WAC	Туре		Title of Fee	Effective: 07/27/08	Effective: 01/16/17
		VAULT RADIOGRAPHY	radiographic exposure devices 1 or more permanent vault	9,124	10,675
		FIELD RADIOGRAPHY	radiographic exposure devices at temp job sites	12,232	14,311
		WELL LOGGING	well-logging activities	5,992	7,010
		PORTABLE GAUGE	portable sealed sources	1,292	1,511
		FIXED GAUGE	nonportable sealed source	1,408	1,647
		GAS CHROMATOGRAPH	gas chromatograph	888	1,038
	Industrial Radioactive	LARGE IRRADIATOR	self-fielded or pool type irradiator	2,460	2,878
	Materials	n/a	sealed sources walk in type irradiator	13,076	15,298
	riateriats	II/ a		13,070	13,230
		LABOE BRODUCTION	greater than 1 gram unsealed special nuclear material or	44.000	40.000
WAC		LARGE PRODUCTION	greater than 500 kilograms	11,388	13,323
246-254-090			less than or equal to 1 gram unsealed special nuclear material		
		SMALL PRODUCTION	or 500 kilograms	3,644	4,263
		n/a	static elimination devices	576	673
	Industrial Radioactive		depleted uranium form RHF-20		
	Materials - depleted				
	uranium	RHF-20 (U-DEP)		116	135
	Industrial Radioactive		general licenses 246-233-020(3)(k) (producing light or ionized		
	Materials -general	GENERAL LICENSE	atmosphere)		
	licenses	REGISTRATION	dimosphore)	344	402
	исепзез	REGISTRATION	Descens with licenses authorizing multiple locations of	044	402
			Persons with licenses authorizing multiple locations of		
			permanent storage shall increase the annual fee by fifty		
			percent for each additional location.	50%	50%
			unsealed sources greater than 1 millicurie of I-125 or I-131, or		
			100 millicuries of H-3 or C-14, or 10 millicuries of any single		
		LARGE LAB	isotope	6,240	7,300
			unsealed sources greater than .01 millicurie and less than or =		
			to 1 millicurie of I-125 or I-131, greater than 10 millicuries and		
		MEDIUM LAB	less than or = to 100 MC of H-3 or C-14	3,080	3,603
	Laboratory radioactive		greater than .01 mc and les than or = to .01 mc of I-125 or I-		-,
	material licenses		131, greater than 1 mc and less than or = to 10 mc of H-3 or C-		
	materiaticenses	CMALLIAD	14	2 502	2 022
		SMALL LAB		2,592	3,032
WAC			less than or = to .01 mc of I-125 or I-131, less than or = to 1 mc		
246-254-100			of H-3 or C-14, less than or = to .1 mc of any other single		
		MICROLAB	isotope	888	1,038
			large quantities of naturally occurring radioactive mat total		
		n/a	concentration not exceeding .002 mc / gram	1,196	1,399
	Laboratory radioactive		in vitro testing		
	material licenses -in				
	vitro testing form RHF-				
	15	RHF-15 IN-VITRO LAB		116	135
			Persons with licenses authorizing multiple locations of use		
			shall increase the annual fee by fifty percent for each		
			additional location.	50%	50%
			2nd follow-up inspection per hour, and each thereafter,	30 70	3070
		n/o		100	100
		n/a	capped at \$1901 - 10 hrs.	162	189
		n/a	environmental clean up per hour monitoring, max \$4,753	162	189
	Licensing and	Various	new license application	260	304
WAC	compliance actions -		sealed source/device evaluation per hour, not to exceed		
		n/a	\$5,703	162	189
246-254-120	additional fees to the		review air emission and environmental programs per hour,		
	above		data collection, analysis of samples, decommissioning		
			activities - by qualified staff (not rad mats staff unless special		
		n/a	service charge exceeding 10% of annual fee.	162	189
			expedited licensing review for OT per hour		
		n/a	,	162	189
WAC	Small business				
246-254-030	discount	various		25%	25%

Expenditures

Costs for the program are classified into four primary cost categories: Operations, Heath Technology Services (HTS), Public Health Lab (PHL) Testing and Indirect.



Operations costs are typically the largest expense of the program and include personnel to manage the program. The program maintains 13.13 full time equivalent (FTE) positions. This includes administration, program management, inspections, technical assistance, compliance monitoring and license generating services.



The program is led by one Radiation Health Physicist 4. This position leads and supervises all direct program staff. The program maintains eight Radiation Health Physicist staff that perform the direct regulation services and account for 61% of staffing costs. These staff are responsible for inspections, generating licenses, removing unwanted materials, conducting investigations, maintaining technical expertise, and preparing for emergency response. The program has two administrative positions. One Health Services Consultant 1 position which provides database administration and monitoring services. These services ensure accurate and timely data collection and reporting. The second administration position, Administrative Assistant 3, is dedicated to daily administration services for the programs 11 FTE. The program is also supported by 2.13 additional FTE that assist in a variety of ways, including IT systems management, financial management, contract management, administration assistance, and support by the Office Deputy Director.

Health Technology Solutions (HTS) activities include operations and maintenance costs for databases that maintain all program data. The program has one database that performs data collection and reporting functions for the program.

Indirect costs are agency-wide, general management costs necessary for any program to exist and consist of administrative activities for the general operation of the agency. Examples of indirect costs include financial services, human resources, and information resource management. The indirect rate is a standardized method of charging individual programs for their share of indirect costs and is reviewed and approved annually by the U.S. Department of Health and Human Services.

Expenditure fluctuation from year to year includes extreme staffing vacancies. Operations expenditure reflects lower expenditure due to less salary and related costs due to staffing shortages. The first year was FY18 with 1.06 vacant FTE, the vacancy rate peaked in FY21 at 4.38 vacancies, and we are currently down to 1 vacancy. The table below shows expenditures for each of these cost categories over the past seven years.

		Р	rogram Spe	ending by O	pearation			
Fiscal Year	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY23
Operations	1,561,469	1,594,658	1,375,199	1,145,768	1,254,960	1,125,568	1,212,188	1,385,426
HTS	66,062	43,075	59,832	71,947	79,053	60,084	74,950	70,522
PHL	20,169	19,108	14,460	8,479	22,408	16,950	16,804	20,719
Indirect	362,579	390,729	348,673	292,821	374,315	314,952	325,679	348,106
Total	2,010,279	2,047,570	1,798,163	1,519,015	1,730,736	1,517,554	1,629,622	1,824,773

Cost Drivers

The cost to license and regulate the Radioactive materials program is primarily driven by the number of licensees and facilities. Currently the program has over 350 licensees with over 480 facilities. Staffing costs account for 73% of total program costs. Inspections and license generation activities account for most staff time. Facilities are inspected on a 1-to-5-year cycle depending on material type. On average, 220 inspections are conducted per year. Inspection times vary widely depending upon material type and typically take as little as four hours and up to five days per facility. Depending on the type of inspection and the complexity of the

facility, up to 5 inspectors may be required on site. Generating licenses for each facility occurs every five to ten years. License amendments occur for significant changes and occur between renewal periods. The time to generate licenses varies greatly, depending on material type and can range from a few weeks to months or even years. Approximately 71 new or renewal licenses and 160 amendments are generated annually. Program travel costs account for 2% of total program costs.

Testing services account for 2% of annual costs and are provided by our Washington State Public Health Lab (PHL) partners. The PHL on average tested 539 analytes annually.

HTS activities include operations and maintenance costs for databases that maintain all program data. The program has one database that performs data collection and reporting functions for the program and accounts for 3% of annual costs. Over time, this database will need to be updated resulting in a one-time cost increase. The last time this technology was upgraded was in 2009.

Operations

Program staff and costs have remained consistent for the past seven years.

Fee Reserve

The Office of Financial Management (OFM) requires the agency to maintain a reasonable working capital reserve in state accounts to cover fluctuations in cash flow. The cash reserve should be enough to protect against financial volatility because of significant regulation activity or unforeseen changes in radiation materials program trends.

Due to the size of this program, the fee balance is susceptible to expenditures resulting from system maintenance replacement costs, years of unusual radioactive material levels, and the occurrence of other unforeseen events. Based on these factors, the department recommends the program build a reserve of 25 percent, currently around \$632,000 or approximately 3 months of annual expenditures.

The program ended the 2023 calendar year with a fee balance of \$1,073,000. The Radioactive materials program is currently projecting at a deficit of this reserve in FY 2024.

Financial Forecast

Revenue

The department does not anticipate any significant growth in licensees over the next five years. Operations are projected to continue renewing at an average renewal rate of 100 percent except for a few licensee types. Most significantly, portable gauge and health physicist service provider licensees who have averaged 6% and 5% decline annually. Portable gauge licensees account for 10% of total revenue annually while health physicist service provider account for 3%. We expect these trends to continue.

Expenditures

The department anticipates costs for the program personnel to increase by three percent annually. Cost increases are primarily due to inflation for personnel-related costs. A one-time higher than normal cost and compensation increase on salaries is expected to occur for most of the staff in the program with a proposed start date of July 1, 2025. This will affect ten of the programs 13.13 FTE staff members.

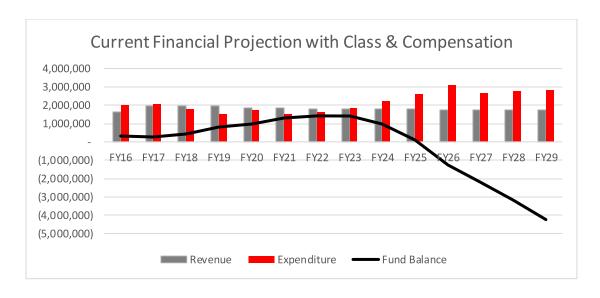
Fiscal Year 26 Class & Compe	nsation Increase
Radiation Health Physicist 1	10%
Radiation Health Physicist 2	17.5%
Radiation Health Physicist 3	17.5%
Radiation Health Physicist 4	17.5%

The department also anticipates a onetime data base replacement cost increase of \$600,000. The current data system is 15 years old and cannot perform the duties and functions required for an efficient workflow process. Program improvements and efficiencies, such as tracking onsite inspection time, tracking training and qualification history which would allow the system to assign work based on qualifications within certain modalities, license generation in a uniform template, tracking of reciprocity, online license application, online license amendments, online access to an electronic copy of customer license, and automated invoicing to the customer through an online portal will be included in this upgrade. The one-time cost is expected in FY 2025 and FY 2026. The department anticipates total system replacement, such as this one, on a 10-year cycle.

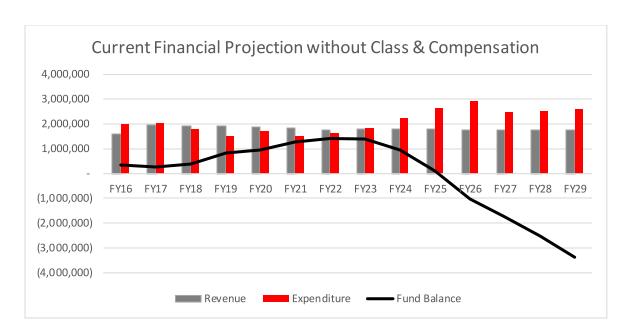
Fee Reserve

The program is not expected to generate enough revenue to cover costs over the next six years, which includes the necessary drawdown of the reserve fee balance.

The chart below shows actual revenue and expenditures from FY16 through FY23, and projected revenue and expenditures from FY24 through FY30 **with** the class and compensation changes.



The chart below shows actual revenue and expenditures from FY16 through FY23, and projected revenue and expenditures from FY24 through FY30 **without** the class and compensation changes.



Fee Proposal

To bring the Radioactive Materials fee balance into alignment with requirements, the program proposes removing unfunded discounts, and a fee increase of up to 31% on all fee types. The increase effective date is proposed to begin October 1^{st} , 2024. The chart below shows the breakdown of the proposed fees.

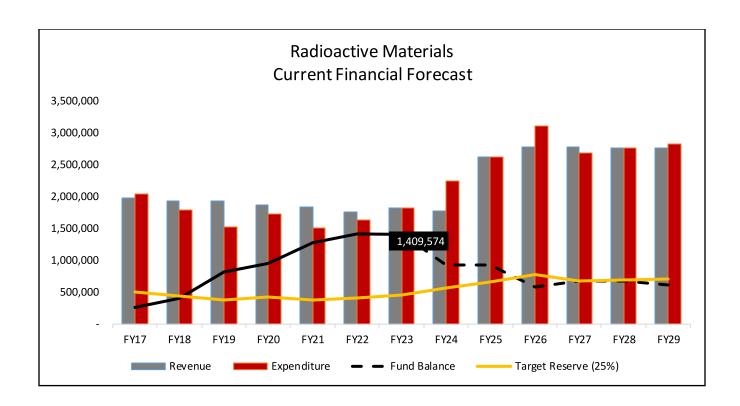
WAC	Туре	Title of Fee		Current Fee		Proposed Fee with Class & Compensation		Proposed Fee w/out Class & Compenation	
		NUCLEAR PHARMACY	Single Nuclear Pharmacy	\$	10,721	\$	14,045	\$	13,187
		NUCLEAR LAUNDRY	Single Nuclear Laundry	\$	18,284	\$	23,952	\$	22,489
		LARGE MANUFACTURER	Single, more than 1 curie	\$	18,284	\$	23,952	\$	22,489
		SMALL MANUFACTURER	Single, less than or = 1 curie	\$	6,406	\$	8,392	\$	7,879
	Specialized Radioactive Material	N/A	redistribution	\$	1,647	\$	2,158	\$	2,026
	License 1) Special categories	DECONTAMINATION	decontamination	\$	12,266	\$	16,068	\$	15,087
		WASTE BROKER	Waste brokerage	\$	5,798	\$	7,595	\$	7,132
		HEALTH PHYSICS	physics service	\$	2,583	\$	3,384	\$	3,177
		CIVIL DEFENSE	civil defense	\$	3,032	\$	3,972	\$	3,729
		N/A	special nuclear	\$	912	\$	1,195	\$	1,122
WAC		BIG BROAD	atomic numbers 3-83 max possession isotope > 1 curie	\$	36,288	\$	47,537	\$	44,634
246-254-070	Specialized Radioactive Material License 2) Broad scope categories	MEDIUM BROAD	atomic numbers 3-83 max possession isotope > .1 curie, less or = 1 curie	\$	16,773	\$	21,973	\$	20,631
	categories	SMALL BROAD	atomic numbers 3-83 max possession isotope less or = .1 curie	\$	13,478	\$	17,656	\$	16,578
	Specialized Radioactive Material License 3) Licensed not covered by any licenses 070-100	OTHER NOT SPECIFIED	Initial Application, considered a credit against future billing	\$	1,170	Ś	1,533	\$	1,439
		N/A	Direct billing time @ \$189/hr. issuing and maintain license & services in WAC 246-254-120	\$	189	\$	248	\$	232
	Specialized Radioactive Material	N/A	non refundable initial application fee new license, credited toward qtrly billing	\$	18,720	\$	24,523	\$	23,026
	License 4) waste processing	N/a	Quarterly billing, actual billing for direct/indirect costs to dept	\$		Ś	_	\$	

		Pro	posed Fee Schedule							
WAC	Туре	Type Title of Fee		CL	Current Fee		Proposed Fee with Class & Compensation		Proposed Fee w/out Class & Compenation	
		MOBILE NUCLEAR MEDICINE	mobile nuclear medicine	\$	9,065	\$	11,875	\$	11,150	
		FULL DIAGNOSTIC	imaging and localization studies written directive not required	\$	6,608	\$	8,656	\$	8,128	
		n/a	unsealed written directive required	\$	5,723	\$	7,497	\$	7,039	
		DIAGNOSTIC & UNSEALED THERAPY	imaging and localization studies, directive not required 246-240-157, written directive is required 246-240-201, manual brachytherapy	\$	9,126	\$	11,955	5	11,225	
		MANUAL BRACHYTHERAPY	manual brachytherapy	\$	4,904	\$	6,424	\$	6,032	
WAC	Medical & veterinary Radioactive	HDR, GAMMA KNIFE, TELETHERAPY	remote after loader unit, teletherapy, gamma stereotactic	\$	3,032	\$	3,972	Ś	3,729	
246-254-080	Materials Use	MEDICAL >200 mCi	bet greater than 200 millicuries	\$	4,605	\$	6,033	\$	5,664	
		MEDICAL>30 < 200 mCi	vet greater than 30 millicuries	\$	3,664	\$	4,800	\$	4,507	
		MEDICAL<30 mCi	vet less than or = to 30 millicuries	\$	2,681	\$	3,512	\$	3,298	
		n/a	uptake, dilution/excretion studies written directive not required	\$	2,363	ś	3.096	ŝ	2,906	
		n/a	vet sealed source diagnostic	\$	1,474	5	1,931	5	1.813	
			The fee for a license authorizing multiple locations shall be increased by fifty percent of the annual fee	7		full ra above	nd facility, ate listed e for each	full r abov	nd facility, ate listed se for each	
			for each additional location		50%	facilit	У	facil	ity	
		VAULT RADIOGRAPHY	radiographic exposure devices 1 or more permanent vault	\$	10,675	\$	13,984	\$	13,130	
		FIELD RADIOGRAPHY	radiographic exposure devices at temp job sites	\$	14,311	\$	18,747	\$	17,603	
		WELL LOGGING	well-logging activities	\$	7,010	\$	9,183	\$	8,622	
		PORTABLE GAUGE	portable sealed sources	\$	1,511	\$	1,979	\$	1,859	
		FIXED GAUGE	nonportable sealed source	\$	1,647	\$	2,158	\$	2,026	
		GAS CHROMATOGRAPH	gas chromatograph	\$	1,038	\$	1,360	\$	1,277	
		LARGE IRRADIATOR	self-fielded or pool type irradiator	\$	2,878	\$	3,770	\$	3,540	
		n/a	sealed sources walk in type irradiator	\$	15,298	\$	20,040	\$	18,817	
WAC	Industrial Radioactive Materials	LARGE PRODUCTION	greater than 1 gram unsealed special nuclear material or greater than 500 kilograms	\$	13,323	\$	17,453	\$	16,387	
246-254-090		SMALL PRODUCTION	less than or equal to 1 gram unsealed special nuclear material or 500 kitograms	\$	4,263	\$	5,585	\$	5,243	
		n/a	static elimination devices	\$	673	\$	882	\$	828	
			Persons with licenses authorizing multiple locations			for 2r	iscount of facility, ate listed	for 2	discount and facility, ate listed	
			of permanent storage shall increase the annual fee by fifty percent for each additional location.		50%		e for each		e for each	
	Industrial Radioactive Materials - depleted uranium	RHF-20 (U-DEP)	depleted uranium form RHF-20	\$	135	\$	177	\$	166	
	Industrial Radioactive Materials -general licenses	GENERAL LICENSE REGISTRATION	general licenses 246-233-020(3)(k) (producing light or ionized atmosphere)	5	402	\$	527	5	494	

	Proposed Fee Schedule									
WAC	Туре	Title of Fee			rent Fee	Proposed Fee with Class & Compensation		Proposed Fe w/out Class Compenatio		
		LARGE LAB	unsealed sources greater than 1 millicurie of I-125 or I-131, or 100 millicuries of H-3 or C-14, or 10 millicuries of any single isotope	\$	7.300	\$ 9.	563	\$	8.979	
WAC 246-254-100		MEDIUM LAB	unsealed sources greater than .01 milticurie and less than or = to 1 milticurie of I-125 or I-131, greater than 10 milticuries and less than or = to 100 MC of H-3 or C-14	5	3,603		720		4,432	
	Laboratory radioactive material licenses	SMALL LAB	greater than .01 mc and les than or = to .01 mc of I-125 or I-131, greater than 1 mc and less than or = to 10 mc of H-3 or C-14	\$	3,032	\$ 3,	972	ŝ	3,729	
		MICROLAB	less than or = to .01 mc of I-125 or I-131, less than or = to 1 mc of H-3 or C-14, less than or = to .1 mc of any other single isotope	\$	1,038	\$ 1,3	860	\$	1,277	
		n/a	large quantities of naturally occurring radioactive mat total concentration not exceeding .002 mc / gram	\$	1,399	\$ 1,8	333	\$	1,721	
	Laboratory radioactive material licenses -in vitro testing form RHF-15	RHF-15 IN-VITRO LAB	in vitro testing	\$	135		77	\$	166	
			Persons with licenses authorizing multiple locations of use shall increase the annual fee by fifty percent for each additional location.		50%	for 2nd fa- full rate ti- above for facility	sted	full rat	d facility, te listed for each	
		n/a	2nd follow-up inspection per hour, and each thereafter, capped at \$1901 - 10 hrs.	\$	189		48	ś	232	
		n/a	environmental clean up per hour monitoring, max \$4,753	\$	189	\$ 2	248	ŝ	232	
		Various	new license application	\$	304	\$ 3	98	\$	374	
WAC 246-254-120	Licensing and compliance actions - additional fees to the	n/a	sealed source/device evaluation per hour, not to exceed \$5,703	\$	189	\$ 2	248	ŝ	232	
246-254-120	above	nla	review air emission and environmental programs per hour, data collection, analysis of samples, decommissioning activities - by qualified staff (not rad mats staff unless special service charge exceeding 10% of annual fee.	\$	189	\$ 2	248	s	232	
		n/a	expedited licensing review for OT per hour	\$	189	\$ 2	48	\$	232	
WAC 246-254-030	Small business discount	various			25%	0%, No Sr business discount		0%, N busin disco		

This proposal allows the department to stabilize the fee balance at the reserve rate. DOH's fee review program routinely evaluates the fee schedule during fee analysis. However, two current circumstances present challenges to completing this evaluation. Recent staffing and recruitment challenges resulted in a significant delay in regulatory requirements. To prioritize onboarding of new staff and overdue regulatory requirements, staff do not have the capacity or expertise to participate in an in-depth study to evaluate the fee schedule. The second challenge is the lack of program data. Program data is often needed to evaluate cost driving services such as onsite inspection time or license generation activities. The program anticipates both challenges to be resolved before our next re-occurring fee analysis. For efficiency and accuracy DOH will review the fee schedule for changes during the next fee analysis. For the current fee adjustment, the department intends to propose an across-the-board increase to bring revenue into alignment with costs.

The chart below shows projected revenue and expenditures for current and proposed fees from FY 2016 through FY 2030.



The department will continue to monitor the financial health of the Radioactive Materials program over a six-year outlook and propose fee adjustments as needed to comply with statutory requirements.