

Date: February 18, 2025

To: Justin Bohall, Chair
IMLCC Rules Committee

From: Jake Manahan, IMLCC Chair

RE: Comments on Proposed Changes to Chapter 3 – Rules on Fees

I may be a little late on weighing in on this matter, but I thought I would put my two-cents worth into the pot.

I have a serious concern that the IMLCC not be restricted in how it chooses to assess fees or collect costs from physicians using our services. I certainly agree that the IMLCC should have the authority to pass on our costs to users. I do not agree that our Rules should include 1) a defined amount of those costs, since they are subject to change, nor 2) a requirement that these costs be passed on, nor 3) a requirement as to how they will be passed on, whether for each transaction or by other means.

There are many ways in which the IMLCC may ensure that fees collected from users properly reflect the value of the services provided, including any hard costs the IMLCC may incur to provide those services. For example, from time to time the IMLCC can adjust the application fee, the letter of qualification fee, or the renewal fee to correspond to changes in the number of those services being requested by physicians. The IMLCC could also, depending upon its financial circumstances, choose NOT to collect certain fees if it's not fiscally required or does not seem prudent or timely.

I don't want the IMLCC to be put into a position where it MUST collect these fees when it may, at times, give the appearance of "nickel-diming" our users. I think it is imperative that the IMLCC be given as much flexibility as possible in this matter. My suggested changes reflect these concerns, and I would request that the Committee give them consideration. Thanks to you and the Committee.

- (1) ~~A non-refundable service fee in the amount of the f~~ Fees paid by the IMLCC for credit card transactions may be passed on to users in a manner to be determined by the Executive Committee. ~~will be applied to all transactions. This fee is charged to cover the cost associated with credit card payment. There will be no service fee for other payment options available to process the application.~~
- (2) ~~A non-refundable service fee in the amount of \$25.00 to be charged to all active physicians to offset the c~~ Costs incurred by the IMLCC for the services provided through the Enhanced Physician Portal, may be passed on to users in a manner to be determined by the Executive Committee. ~~The service fee will be added to the first renewal application of each calendar year commencing the first year after the initial Letter of Qualification (LOQ) is received.~~