

Submitter: Lisa Sciarani

On Behalf Of:

Committee: House Committee On Economic Development, Small Business, and Trade

Measure, Appointment or Topic: HB3588

My name is Lisa Sciarani and I am a licensed clinical social worker. I am the sole provider of my business, Your Path Forward Counseling, where I provide mental health therapy.

I have been both an office subscriber as well as a “mail only” subscriber with Brightside Coworking. I currently use just the mail services as I see clients mostly through telehealth and have been on medical leave. I chose to go with Brightside Coworking so I had the option to schedule in-person sessions in an office flexibly, reduce my monthly costs when I don’t need to go into an office, and so I would not have to register my business with my personal address for privacy and safety reasons.

The restriction against registering my business at the Brightside Coworking address because it had to be registered as a Commercial Mail Receiving Agency (CMRA) with the USPS caused me a lot of panic and financial uncertainty. Without much warning, I could not renew my business license as I had before. I only had a very limited time, while I was on intermittent medical leave, to figure out how to renew my business license. I had to hope that sending in my application for renewal would be approved or that it would be denied and processed with enough time for me to find an alternative address. Securing a new lease and changing addresses would have caused an administrative backlog and likely a significant loss of income.

I would like to be able to renew my license online again using the Brightside Coworking address as it is simple, immediate, and does not involve state employees in order to process it. Logically, I should be able to renew my license using a business address that is a physical office where I see clients. Additionally, there should be ways for people to register a business without having to use their home address; CMRAs allow for this option. The Centers for Medicare and Medicaid Services (CMS) allows individual providers who are providing telehealth services from their home to use a CMRA address for their National Provider Identifier (NPI) registration in order to protect their privacy.

Thank you.