



ADVOCATE FOR MASSAGE THERAPY AS A RECOGNIZED AND RESPECTED HEALTHCARE PROFESSION

March 7, 2018

To: Meghann Lawrence, LMT, Chair, and Members of the Board of Massage

From: Comments Submitted by the WSMTA Clinical Practices Program as approved by the WSMTA Board of Directors

Re: WSMTA Suggestions and comments on Chapter 246-830-475 Continuing Education Requirements

The Washington State Massage Therapy Association (WSMTA) recommends that:

1. Both CPR and First Aid be required, but that "in person" training not be a requirement.
2. "Roles and Boundaries" required in ethics classes be dropped from the language as NCBTMB no longer requires this and WA's WAC language was mirrored to the original NCBTMB language.
3. Ethics be allowed to be taken in any format offered as long as it meets all other WAC requirements.
4. Massage Techniques that are taught via Multimedia Devices or Distant Learning only be accepted if the organization sponsoring it attests that there is a hands-on self-study component which was completed.
5. The AMTA-WA recommended language in new section 3 which specifies the form that attestation of attendance or completion of CE should take. WSMTA has made slight modifications to make it more similar to NCBTMB requirements but supports the AMTA-WA's language.

1. CPR and First Aid

In 2017, when continuing education was last discussed by the Board of Massage, it was proposed that since massage school students are required to do in person CPR and First Aid training, that LMTs should also be required to do in person training for consistency. WSMTA suggests that there is no correlation of need to maintain consistency. LMTs are already trained in first aid and CPR, whereas massage school students may be receiving the training for the first time. In addition:

- No other healthcare profession specifies in person training. LMTs should have a mirror requirement as other disciplines.
- While it would seem to make sense that CPR should be done in person, there are some trainings that do the clinical reasoning aspect of CPR online with a hands-on practice element and a hands-on test. Requiring in person would eliminate this option.
- There are only 7 cities in Washington state that offer in person Red Cross or American Health Association sponsored training and can represent an undo financial burden to LMTs outside of the major population centers in Washington. The Red Cross only sponsors in person classes in Bellingham, Everett, greater Seattle area, Tacoma, Olympia, Kennewick and Spokane. The American Heart Association only sponsors classes in Everett, greater Seattle area, Tacoma, Olympia and Spokane.

The vast majority of first aid is done online, while CPR is generally done in person in larger cities but online in rural areas. For example, if you live in Cle Elum, the nearest CPR and First Aid in person classes for the Red Cross or American Heart Association are in Seattle over 70 miles away. If you live in Okanogan, then the closest in person Red Cross or American Heart Association sponsored location is 158 miles away in Spokane. While some smaller communities might have first aid or cpr in person classes taught by the local fire department or hospital, not every rural community has one.

2. Ethics -- "Roles and Boundaries"

WSMTA supports proposals by others that "roles and boundaries" be made a suggested topic of ethics and not a requirement. The "roles and boundaries" is a left over from NCBTMB's ethics requirement which Washington's Board of Massage mirrored when it created an ethics requirement about 7-8 years ago. However, NCBTMB no longer has this as a requirement, so we strongly encourage the Board to make it a possible topic and not a requirement.

3. Ethics -- Mode of Delivery

The current ethics requirement does not specify how it should be taught. WSMTA advocates that it should remain this way. While WSMTA believes that in person classes generally offer a better learning environment, we also recognize the financial hardship some LMTs face who do not live near major cities that offer large amount of CE opportunities and have to travel long distances to attend in person classes. As ethics classes can be taught in any medium, WSMTA does not believe that it should be limited to in person.

4. Massage Technique -- Mode of Delivery

All massage school learning of hands-on technique is required to be done in person. WSMTA would like the Board of Massage to make the CE requirement for learning massage technique also in person. We would make an exception if the organizer of multimedia or distant learning has built in a hands-on self-study component and the class instructor/organizer indicates it on its certificates of completion that a student would receive upon completion of a multimedia or distant learning course. Any multi-media or distant learning CE that taught technique which does not have a hands-on self-study component would not be accepted. If this is determined too difficult to manage by the DOH then we would request that any continuing education for massage technique have an in person requirement.

WSMTA's WAC 246-830-475 Recommended Language Changes:

- The Original WAC is in Blue
- AMTA-WA suggested changes and deletions are in Green and underlined (AMTA-WA comments in green)
- WSMTA's changes and deletions are in Red and italicized and bolded (WSMTA comments in red)

Wherever AMTA-WA's changes/deletions/comments remain, WSMTA supports them and left them in the wording instead of sticking to the original WAC text.

WAC 246-830-475 Continuing education requirements.

(1) To renew a license, a massage therapist must complete twenty-four hours of continuing education every two years. Massage therapists must maintain a current certification in American Red Cross first aid and American Health Association CPR or the equivalent **and training must be in person.** (No other profession has a specific in person training and most first aid is generally done online by other professions. It also represents a hardship for the majority of LMTs as hands-on classes are not often taught in small communities or outside of the I-5 Corridor or the Spokane area) This requirement is in addition to the twenty-four hours of continuing education. The Board will not authorize or approve specific continuing education courses. Continuing education must be provided by an individual who has at least three years of practical experience post licensure in the area/topic being taught. (WSMTA strongly agrees with the re-instatement of the 3 year experience requirement as it was dropped from the WAC 7-8 years ago when it was revised.) Of the twenty-four hours of continuing education:

(a) A minimum of eight hours must be direct supervised massage skills training; and

(b) A minimum of four hours must be in professional ethics, communication, professional roles and boundaries, or Washington state massage laws and regulations. ~~Two of these hours must include professional roles and boundaries be in classroom hours;~~ and (although WSMTA believes that in-class ethics hours are more effective, it would put an undo financial burden on LMTs east of the I-5 corridor who have to travel to take a 2-hour ethics course. These classes can be taught in any media.) and

(c) The remaining twelve hours may be in any topic reasonably related to massage therapy knowledge, skills, and business practices met by meeting the requirements in subsection (2) of this section.

(2) For the purposes of this chapter, subject to the limitation in subsection (1)(a) and (b), continuing education ~~is defined as any of the following activities that involve direct application of massage therapy knowledge, skills, and business practices~~ may be obtained by:

(a) Documented attendance. Attendance at a local, state, national, or international continuing education program.

(b) ~~First aid, CPR, or emergency related classes.~~ (This topic is covered in subsection (1).)

(c) Self-study through the use of multimedia devices or the study of books, research materials, and/or other publications.

(i) Multimedia devices. The required documentation for this activity is a letter or other documentation from the organization. ***The learning of hands-on technique via multi-media devices will not count unless there is a technique self-practice component attested to in the documentation provided by the multimedia organization.*** ~~A maximum of twelve hours is allowed per reporting period.~~ (This language is not needed, because the maximum number of hours is already 12 per (1)(c).)

(ii) Books, research materials, and/or other publications. The required documentation for this activity is a two-page synopsis of what was learned written by the licensee. ~~A maximum of two hours is allowed per reporting period.~~ (same comment as (i)) ***A maximum of two hours is allowed per reporting period.*** (WSMTA would like this left in as it appears to be an oops and should be left in as it only concerns 2 hours and not 12 hours).

(d) Teaching a course for the first time, not to exceed eight hours.

(e) Business and management courses not to exceed eight hours.

(f) ~~Specialized training. Training must be provided for a fee by an individual who has no less than three years of expertise in that area.~~ (This is deleted because the topic is already covered in subsection (1).)

(g) Distance learning. Distance learning includes, but is not limited to, correspondence course, webinar, print, audio/video broadcasting, audio/video teleconferencing, computer aided instruction, e-learning/on-line-learning, or computer broadcasting/webcasting. ***The learning of hands-on technique via distance learning will not count unless there is a technique self-practice component attested to in the documentation provided by the distant learning organization.*** ~~A maximum of twelve hours is allowed per reporting period.~~ (This language is deleted, because the maximum number of hours is already 12 per (1)(c)).

(h) Active service on massage related boards or committees. ~~A maximum of twelve hours is allowed per reporting period.~~ (Same comment as (g)).

(3) A massage therapist must provide acceptable documentation of attendance upon request or audit.

Acceptable forms of documentation include:

(a) Transcripts,

(b) Letters from course instructors, or organizations providing the continuing education, or,

(c) Certificate of attendance or completion, or

(d) Other formal documentation that includes:

(i) Participant's name,

(ii) Course title,

(iii) Course content,

(iv) Date(s) and hours of course,

(v) Number of CE Hours

(vi) Indication of Live Course, Home study or Live Webinar

~~(v)~~ ***(vii) Instructor's name(s) and/or sponsor organization name(s)***

(viii) Instructor or sponsor contact information

~~(vi)~~ ***(ix) Signature of the program sponsor and/or course instructor.*** Multimedia courses are exempt from the signature requirement.

(4) Massage therapists ***who maintain an active status Washington state license in active status*** who reside and practice outside Washington State must meet all continuing education requirements.

(5) Massage therapists may carry forward to the next continuing education cycle up to 12 additional credits earned in the category described in (1)(a), direct supervised massage skills training. Excess credits earned in category (1)(a) in one continuing education reporting cycle may only be carried forward to the next two year reporting cycle. (This provision is a recognition of the fact that many hands-on skill training classes are often very lengthy, and allowing for this limited type of carry-forward is equitable and fair.)

Thank you for your consideration,



Robbin Blake, LMT WSMTA Clinical Practices Program Member



Susan Rosen, LMT WSMTA Board Member and Founder, Clinical Practices Program Director