



**ADVOCATE FOR MASSAGE THERAPY AS A RECOGNIZED AND RESPECTED HEALTHCARE PROFESSION**

April 10, 2019

**To:** Stephanie Dickey, LMT, Chair, and Members of the Board of Massage

**From:** Comments Submitted by the WSMTA Government Relations Program as approved by the WSMTA Board of Directors

**Re:** WSMTA Suggestions and comments on Chapter 246-830

**Chapter 246-830-005 Definitions:**

- Please do not delete the references to WACs in any of the subsections of this WAC. While it is incumbent on every LMT to know the regulations, it also is a big help to direct LMTs to WACs that impact the topics in the definition section.
- Perineum Definition:

(19) "Perineum" means the tissues between the anus and scrotum or vulva. Massage of the perineum is only allowed as authorized in WAC 246-830-XXX.

**Chapter 246-830-030 Licensing by endorsement for out-of-state applicants.**

In the newly added section 1a (ii) A minimum of five hundred hours and at least five years of experience and documentation of at least 48 hours of continuing education within four years prior to making application; The WSMTA would argue that setting a 5 year experience requirement is both arbitrary and punitive to massage therapists from other states who are licensed and in good standing in their state and who have completed 48 hours of continuing education but who have less than 5 years experience. The public good will not be any more protected whether a massage therapist has 4 years or 4.5 years or 5 years experience.

WSMTA is in favor of adopting language from another state which has already gone from the 500 to 625 hour change. Oregon state offers LMTs from other states the ability to transfer to Oregon if they have a 500 hour program by making up the difference of 125 hours with a mix of work experience and continuing education.

For ease of reference, I have copied the Oregon requirement in blue below. This seems to be an equitable method to allow for applicants to become licensed in Washington state when their basic massage education was less than the new 625 hour requirement. At this time, WSMTA does not have suggestions on what the recommended breakdown should be for the Washington State categories.

The credentialing review and its additional \$250 fee is only pertinent to those out of state applicants who have been legally practicing for many years and may not meet the traditional education requirement through certified class instruction.

Upon completion of a credentialing review the Board may grant a license to applicants who are or have legally practiced massage and/or bodywork outside of the State of Oregon; after successful completion of the jurisprudence, and written examinations.

Official Transcripts or Certificates of Completion and Practical Work Experience must be documented on the Credentialing Review Application Addendum and Work Experience Verification Worksheet.

The applicant must provide transcripts for:

- 200 Anatomy and Physiology, Pathology and Kinesiology hours /8 quarter credits/5.34 semester credits of this with 120 hours/4.8 quarter credits/3.2 semester credits minimum must be from certified class instruction with up to 80 contact hours of prior continuing education in subject areas may apply; and
- 300 hours/12 quarter credits/8 semester credits Massage Theory and Practical Application, Clinical Practice, Business Development, Sanitation, Communication and Ethics hours of this 140 hours/5.6 quarter credits/3.7 semester credits minimum must be from certified class instruction with up to 120 contact hours of prior continuing education in subject areas, up to 40 hours of practical work experience may apply, and;
- 125 hours/5 quarter credits/2.4 semester credits which may be in either Health Sciences, Massage or Bodywork Theory and practical application, Clinical Practice, Business Development, Communication, Ethics, Sanitation or Hydrotherapy. Of the 125 hours required, up to 75 contact hours of prior continuing education in subject areas may apply.

This can be found at: <https://www.oregon.gov/obmt/Pages/license.aspx> and click on the "credentialing review" link.

### **WAC 246-830-420 Approval of massage school, massage program, or apprenticeship program.**

Section 1(h)(i) states: [Verification that the school is approved to operate in the state of Washington, or has pending approval by the workforce training and education coordinating board;](#)

The added text of "or has pending approval" should be removed. Either a school is licensed by Workforce or it is not. Being in the application process with Workforce generally leads to approval, as Workforce allows a school to correct deficiencies, but unless DOH has some ability to monitor the application process and be on top of it should approval not be given, then it only makes sense to verify whether a school is licensed or not by Workforce, and not in a "pending approval" status.

### **WAC 246-830-475 Continuing education requirements.**

We recommend that in Section 2, Remaining Hours, all reference to, "a maximum of 8 hours" be removed from all subsections that state it. In the current WAC version of CE, a maximum of 12 hours is the maximum amount of "remaining hours" and there are only a few subject areas such as business or teaching a class for the first time or book reports that has limitations on hours.

In the revision of this WAC, every Remaining Hours category (except for the book report) is given a maximum 8 hours limit. However, remaining hours has the potential to range between 8 and 12 hours, it is no longer a set amount like it has been. It is possible that there could be a CPR program out there that maintains it's certification for longer than 2 years or does recertification that takes less than 4 hours. So, mandating 8 maximum hours in almost every category defeats the purpose of having "remaining hours" be flexible based on an individual's circumstances.

### **WAC 246-830-565 Recordkeeping.**

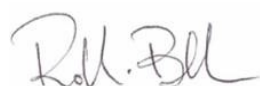
In section, 1(g) [Written consent to treat. A written consent is considered valid for one year unless revoked or there is a gap in the delivery of care of ninety days or more;](#)

We strongly encourage the Board of Massage to change this language to:

(g) [Written consent to treat. A general written consent is considered valid for one year unless revoked.](#)

The industry standard across all health care professions is one year, which generally goes from Jan 1 to Dec 31, with consents renewed at the beginning of the calendar year.

Thank you for your consideration,



Robbin Blake, LMT WSMTA Board Member and Government Relations Director