



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

September 26, 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 246-830-550 Standards of Practice -- Limitations.

The Washington State Massage Therapy Association (WSMTA) recommends that the Board of Massage (BOM):

1. Provide revised language that is more anatomically correct and provide definitions and clarity around some terms.
2. Instead of using the term "perineal floor" we have changed to just using the term "gluteal cleft" and "perineum" to keep terms simple and understandable.

**Regrouping and Anatomically Correct Language for WAC 246-830-550:**

In providing suggestions to make the existing WAC language easier to read, the anatomical areas excluded from massage were reorganized by anatomical region to make for easier reading and understanding. Also, clarity was provided to make the areas described more understandable. We also added "Perineum" and its definition into the excluded body parts listing.

Below is the WSMTA's recommendations for revising WAC 246-830-550. Our recommendations include the additions which are underlined and in blue and the strikeouts. Note, "inside the [name of body part]" format was used to be consistent with the language regarding the mouth.

- Current WACs are in Black
- [WSMTA's Comments are in Blue and underlined](#)

**WAC 246-830-550 Standards of practice—Limitations.**

(1) It is not consistent with the standard of practice for a massage therapist to touch the following body parts on a client or patient:

- (a) The gluteal cleft (space distal to the coccyx to the anus) and perineum (space between the scrotum/vulva and anus), unless in accordance with WAC 246-830-XXX. ~~Gluteal cleft, distal to the coccyx, anus and rectum;~~
- (b) Anus or inside the rectum; ~~Inside the mouth unless an intraoral endorsement has been issued;~~
- (c) Penis-Inside the Urethra;
- (d) ~~Prostate;~~ Penis and scrotum;
- (e) ~~Scrotum;~~ Vulva: to include, labia (major and minor), clitoris, bulb of vestibule, vulval vestibule, urinary meatus and the vaginal opening.
- (f) Inside the Vagina; ~~to include:~~
  - (i) Intravaginal;
  - (ii) Labia (majors and minors);
  - (iii) Clitoris;
  - (iv) Urethra; or
- (g) Breasts, unless in accordance with WAC 246-830-555.
- (h) Inside the mouth unless an intraoral endorsement has been issued in accordance with WAC 246- 830-490;

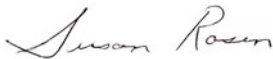
~~(2) A massage therapist must maintain evidence of the completion of at least sixteen specialized in-person contact hours of education and training if they are performing massage in the perineal area in addition to obtaining prior written and verbal informed consent. This written consent may be included within an overall general consent to massage document, if clearly delineated and either specifically initialed or signed.~~

~~(3) (2) A massage therapist must not engage in sexual misconduct as described in WAC 246-16-100. Sexual misconduct will constitute grounds for disciplinary action.~~

Thank you for your consideration,



Robbin Blake, LMT WSMTA Board Member and Clinical Practices Program Member



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