



ADVOCATE FOR MASSAGE THERAPY AS A RECOGNIZED AND RESPECTED HEALTHCARE PROFESSION

November 2, 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 current draft language

We would like to thank the Board of Massage for the effort it has put in to arrive at the current level of WAC draft language. Except for a couple of small suggestions that we will make in this memo, we are satisfied with the draft language as it was put forward in Megan Maxey's email dated 10/8/18. We also wanted to thank Megan Maxey for putting the updated draft language documents on the website and then notifying us about them as it makes the process so much easier to follow and get the word out about changes.

Suggested Change -- WAC 246-830-475 Continuing Education Requirements Subsection 2

In the subsection 2 remaining hours category, there are "8 maximum hour" statements in Sections:

- 2bi Multimedia Devices
- 2c Teaching a course for the first time
- 2d Business and management courses
- 2e Distance Learning and
- 2f Active Service

These 8 hour maximum hour statements should be removed as most likely Remaining Hours will only equal 4 hours since First Aid/CPR are now a requirement at a maximum of 4 hours and most likely will have to be renewed every 1-2 years. Even in the not very likely chance that a person had a 3 year card and could skip a renewal cycle on reporting for CPR/First Aid, the maximum number of Remaining Hours would then be 8 hours for that person. Having the 8 hour maximum is no longer necessary.

Suggested Change -- WAC 246-830-565 Recordkeeping Subsection 1g

Subsection 1g draft language currently states:

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

It is industry standard across professions to do a 1year consent to treat period -- chiropractors, physical therapists, doctors, etc. do this as well as many massage therapists. Generally the practice is such that when an existing client comes in after January 1 for the first time for treatment, they have to fill out new consent to treat as well as financial obligation paperwork as part of their intake paperwork.

Some practices/clinics may require this paperwork for every new episode of care but it's not the general practice.

Adding, "unless...there is a gap in the delivery of care of ninety days or more," does not add to the protection of the general public and adds unnecessary paperwork and expense to the profession. We recommend the following revision:

(g) Written consent to treat. A consent is considered valid for one year unless revoked; ~~or there is a gap in the delivery of care of ninety days or more;~~

Suggested Change -- WAC 246-830-560 Coverage and draping Subsection 3

(3) With prior signed or initialed written, and verbal, and signed informed consent of the client or patient, the gluteal, and breast, and genital drapes may be temporarily moved in order to perform therapeutic treatment of the area consistent with WAC 246-830-550, WAC 246-830-555, and WAC 246-830-xxx. In addition, with informed and written consent, a client or patient may choose to have their upper torso undraped during the entire massage.

We are suggestion that "gluteal" be changed to "gluteal cleft" to be consistent with wording in Subsection 2 so there is no confusion that the law pertains to just the gluteal cleft. The wording would be as follows.

(3) With prior signed or initialed written, and verbal, and signed informed consent of the client or patient, the gluteal **cleft**, and breast, and genital drapes may be temporarily moved in order to perform therapeutic treatment of the area consistent with WAC 246-830-550, WAC 246-830-555, and WAC 246-830-xxx. In addition, with informed and written consent, a client or patient may choose to have their upper torso undraped during the entire massage.

Further Comments

In addition to the items mentioned above in this memo we will be resubmitting 2 existing documents and submitting a new one. They refer to:

1. **WAC 246-830-035 Licensing for out-of-state applicants Section 1b.** We need to take 625 hours for massage licensing and update other mentions of the minimum number of massage program hours required for licensing in the other massage WACs. WAC 246-830-035 was the only other one that we could find that mentioned the number of massage hours required for licensing.
2. **WAC 246-830-035 Licensing for out-of-state applicants Section 1c.** This section requires massage therapists to provide 24 hours of hands-on delivery of massage therapy services if they have a gap of 3 years or more. This would be illegal as it would require people to practice without a license.
3. **WAC 246-830-005 Definitions.** Add the definition of "perineum".

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