



ADVOCATE FOR MASSAGE THERAPY AS A RECOGNIZED AND RESPECTED HEALTHCARE PROFESSION

November 13, 2019

To: Heidi Williams, LMT, Chair, and Members of the Board of Massage (BOM)

From: Comments Submitted by the WSMTA Government Relations Program

Re: WSMTA Suggestions and comments on revised language WAC 246-830-035 Licensing by endorsement for out-of-state applicants and WAC 246-830-430 Education and Training

WAC 246-830-035 Licensing by endorsement for out-of-state applicants and WAC 246-830-430 Education and Training

Prior to the September 2019 Board of Massage meeting, the BOM had determined that WA state massage therapy education and training programs should maintain the current existing requirement that they should not be completed in less than 6 months (WAC 246-830-430 Education and training, subsection 1 original language). When considering whether to impose the same 6 month minimum standard on out-of-state endorsements, the BOM consistently chose not to impose this same 6 month minimum standard required for in-state schools on out-of-state applicants. In every debate the BOM had regarding this topic it had consistently determined that:

- LMTs from other states, who are licensed and in good standing with their state requirements should not be inhibited from transferring to WA state if they meet the requirements set forth by WA state because their home state does not have a minimum time requirement like WA state, since many states do not; or do not have the same minimum requirement.
- Out-of-state LMTs can make up the deficiency of an inadequate mix of education to meet WA state requirements, but there isn't a sufficient mechanism, to make up "time" if they completed an educational program that met all other endorsement requirements, but was completed in less than 6 months.

In the September Board of Massage meeting, information was provide on about 12-14 recent out-of-state applicants for endorsement and as was information provided regarding the Florida regulation regarding the wording of how they regulate massage programs. Based on this information, the BOM decided to adopt the Florida language of "at a rate of no more than six classroom hours per day and no more than thirty classroom hours per calendar week" for both out-of-state applicant endorsement and for massage school education training. The public members in the audience resoundingly disagreed with this wording, to include the WSMTA. Here are the reasons why:

- The WA state minimum for 625 hour is 6 months or 26 weeks. Florida's wording would allow WA state schools to complete their programs in a minimum of 625 hours/30 hours/week = 20.83 weeks. This new wording would allow programs in WA state to be completed just over 5 weeks shorter than the current requirement of six months.
- WA state weekend programs, often have 8 hour training days on the weekends as do some primarily weekday programs. As an example, the now defunct, but highly regarded Brian Utting School of

Massage (BUSM) 1000-hour program had 4-hour weekday class times three days per week and then had 2 8-hour weekend days per month. BUSM would not be able to operate under this new language since the school had longer than 6-hour days.

- Massage programs do not always have the same number of hours from week to week as they have to allow for different modes of learning as well as student clinic.

The WSMTA recommendations on these WACs are as follows:

- For WAC 246-830-035 Licensing by endorsement for out-of-state applicants: Please leave the regulation as it was written before the September 2019 BOM meeting and do not state a time requirement for the completion of an out-of-states applicant's massage education.
 - If the BOM feels that a bare minimum standard should be set to prevent LMTs from transferring from out-of-state "paper mills", WSMTA could support that, but suggests that research should be done to set the bare minimum standard instead of selecting an off-the-cuff amount of a bare minimum time.
- For WAC 246-830-430 Education and Training: Please leave the regulation as it was written before the September 2019 BOM meeting allow for a minimum of 6 months (or 26 weeks).
 - There isn't a standardized massage therapy training program format. Unless the BOM/DOH were to do thorough research to determine what minimums and maximums should be per day and per month for massage therapy education, it should not set standards on it. Should the BOM decide to do so, doing such research would take some time and money to do well and should be done at a later date and not part of this round of WAC review.

Thank you for your consideration,



Robbin Blake, LMT WSMTA Government Relations Director, Board Member