



**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 throughout WAC 246-830

**WAC 246-830-420 Approval of massage school, massage program, or apprenticeship program, section (1i), subsection (i)**

This subsection reads: "[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;"

WSMTA, recommends that this new language, "or has pending approval" be removed. Workforce either approves or doesn't approve. Sometimes, it will provide approval, but still requires the applicant to turn in specific documents. Workforce could reverse this approval should the documents not be turned in. However, someone in the Department of Health/Board of Massage would have to monitor this actively. So we suggest that "pending approval" be removed as the BOM approval should be based only on Workforce approving the program(s).

**Effective Dates for 625-hour program changes throughout various WACs.**

It was proposed at the September 2019 BOM meeting that a 6-month effective date be used from the date the Governor signs the CR103. WSMTA has no opinion on the actual effectiveness date timing itself. However, we believe that since the 625-hour change is so significant of a change for massage schools that the department of health should formally notify every school of the upcoming changes once an actual date timeframe is set by the BOM. While most massage schools are probably aware of the change, there is no guarantee that every massage school is.

**Effective Date for CPR CE Requirement in WAC 246-830-475 Continuing education requirements**

With the new addition of the CPR requirement for CE, there has been as of yet no discussion about when this should go into effect. WSMTA recommends that this should go into effect not earlier than 1 year after the expected timeframe in which the governor signs off on the CR103. While there are less than 100 massage schools, there are almost 14,000 massage therapists and it takes time to disseminate information. The WSMTA can attest that when the CE regulations changed from a 16-hour requirement to one of 24 hours, there were LMPs back then who were unaware of the changes over two years after the change went into effect.

**WAC 246-830-475 Continuing education requirements section 3, subsection (c)(i)**

This WAC subsection states:

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

(i) Multimedia devices. The required documentation for this activity is a one page, single spaced, twelve point font synopsis of what was learned written by the licensee. The time spent writing a synopsis is not reportable. letter or other documentation from the organization. A maximum of twelve hours is allowed per reporting period."

(ii) Books, research materials, and/or other publications. The required documentation for this activity is a one page, single spaced, twelve point font synopsis of what was learned written by the licensee. The time spent writing a synopsis is not reportable.~~two page synopsis of what was learned written by the licensee.~~ A maximum of two hours is allowed per reporting period.

With this current revision, there is a statement as to how many credit hours are allowed per reporting period for subsection (ii) only, but not subsection (i). Also, there isn't a means to determine how many CE credit hours are assigned to a report. For example, does one report equal one CE credit hour, or two CE credit hours? WSMTA would suggest two credit hours. If a maximum of two hours is allowed for subsection (i) also, it would seem that this section of the WAC could be condensed down to:

(c) Self-study through the use of multimedia devices or the study of books, research materials, and/or other publications. ~~as follows:~~ The required documentation for this activity is a one page, single spaced, twelve point font synopsis of what was learned written by the licensee. The time spent writing a synopsis is not reportable. Two hours of credit is provided per report and only one report may be submitted per reporting period.

Thank you for your consideration,



Robbin Blake, LMT WSMTA Government Relations Director, Board Member