



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

January 7, 2019

**To:** Stephanie Dickey, 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 246-830-035 Licensing for out-of-state applicants.

- Current WACs are in Blue
- AMTA-WA's suggested changes and deletions are in red and underlined
- WSMTA's Comments are in black and italicized

The Washington State Massage Therapy Association (WSMTA) recommends that:

- the AMTA-WA's September 2017 suggested language in WAC 246-830-035 Licensing for out-of-state applicants Section (1)(c) be approved as it's written, with one additional word change.

### **WAC 246-830-035 Licensing for out-of-state applicants.**

(1)(c) If there is a gap in ~~practice licensure~~ of three or more years immediately prior to applying for a license by endorsement, the applicant must provide documentation of twenty-four hours of hands on ~~delivery of continuing education in massage therapy services~~. (AMTA-WA Comment from September 2017: How is the applicant going to legally deliver massage therapy services, if they aren't legally authorized to practice massage in Washington State? This subsection needs to refer to CE.)

The original language:

If there is a gap in practice of three or more years immediately prior to applying for a license by endorsement, the applicant must provide documentation of **twenty-four hours of hands on delivery of massage therapy services**.

is actually illegal as unlicensed persons cannot "deliver massage therapy services" under our law. Making the requirement 24 hours of CE is equitable and making it "hands-on" gives the out of practice therapists additional practice before becoming licensed.

Also, we would suggest a further word change in the first sentence to "licensure" (in black and in italics). The Board of Massage is responsible for licensing, not making sure that massage therapists are actively practicing. So we would suggest that the word "practice" be changed to "licensure".

Thank you for your consideration,

A handwritten signature in cursive script that reads "Robbin Blake".

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

A handwritten signature in cursive script that reads "Susan Rosen".

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