



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.

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

1. WAC 246-830-035 Licensing for out-of-state applicants.(1)(a) continue with the same language and only be amended to reflect:

- the change to the 625 hours required for licensure in Washington State
- that any applications received prior to the effective date for the change to 625 hours of massage education be accepted at the 500 hour requirement.
- the WA Board of Massage allow a mix of continuing education and work hours similar to what Oregon has adopted to be used to allow out of state applicants the ability to reach the 625 hours.

- Current WACs are in Blue
- WSMTA's Comments are in Red

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

(1) A massage therapist applicant holding a massage license in another state or foreign jurisdiction may be granted a Washington massage license if:

(a) The board determines the other state's or foreign jurisdiction's education and training requirements are substantially equivalent to Washington's. Substantial equivalency means a course of study at a massage school or massage program that requires a minimum of five hundred hours approved by the equivalent licensing agency or agencies in the state or foreign jurisdiction in which it is located at the time of applicant's graduation. After xx-xx-xx, (fill in the date the massage hour requirement changes) a minimum of six hundred and twenty five hours are required.

1. Out of State Applicants meet the 625 Hour Requirement

Although, WSMTA promotes portability across states, in Washington State, massage therapists have a different environment in which we practice as health care professionals regardless of what setting we practice in or what modalities we practice. Regardless of what the WAC 246-830-430 Education program requirements are changed to with regard to both hours and program content, massage therapists in Washington state are afforded certain privileges and responsibilities through the Every Category of Provider regulation (WAC 284-170-270) as well as being health care providers. As such, every massage therapist entering Washington State thus receives these same privileges and responsibilities of being a health care

professional and is eligible to provide services to health insurance members and thus need to meet the same standards as in-state massage therapists by whatever date any change to massage education hours and program content go into effect.

2. Out of State Applicants Given the Same Minimum Hours to Comply as Massage Schools

We also believe that LMTs from out of state should be afforded the same amount of time to comply as the 500 hundred mark that schools are given to fully get their programs in compliance with the 625 hour massage program requirement.

3. Parity to Oregon's Out of State Applicant Education Hours Requirements

Oregon allows out of state applicants to use a mix of basic massage school education, continuing education hours and work hours to make up their 625 hours. For ease of reference, I have copied the Oregon requirement in blue below. This seems to be an equitable method to allow for applicants to become licensed in Washington state when their basic massage education was less than the new 625 hour requirement. At this time, WSMTA does not have suggestions on what the recommended breakdown should be for the Washington State categories, but we recommend that something similar should be adopted in Washington.

The applicant must provide transcripts for:

- **200 Anatomy and Physiology, Pathology and Kinesiology hours /8 quarter credits/5.34 semester credits** of this with **120 hours/4.8 quarter credits/3.2 semester credits** minimum must be from **certified class instruction with up to 80 contact hours of prior continuing education in subject areas may apply;** and
- **300 hours/12 quarter credits/8 semester credits** Massage Theory and Practical Application, Clinical Practice, Business Development, Sanitation, Communication and Ethics hours of this **140 hours/5.6 quarter credits/3.7 semester credits** minimum must be from **certified class instruction with up to 120 contact hours of prior continuing education in subject areas, up to 40 hours of practical work experience may apply;** and;
- **125 hours/5 quarter credits/2.4 semester credits** which may be in either Health Sciences, Massage or Bodywork Theory and practical application, Clinical Practice, Business Development, Communication, Ethics, Sanitation or Hydrotherapy. **Of the 125 hours required, up to 75 contact hours of prior continuing education in subject areas may apply.**

This can be found at: <https://www.oregon.gov/OBMT/Pages/licensing.aspx>

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