



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

September 26, 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 Chapter 246-830-475 Continuing Education Requirements

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

1. The 2 hours of "Roles and Boundaries" as required in a 4 hour ethics classes be dropped as a requirement. NCBTMB no longer requires this and WA's WAC language was mirrored to the original NCBTMB language. It should be added to ethics as a suggested topic.
2. Create clarity as to whether section 2 only applies to "remaining hours" (section 1d) or to ethics (section 1b), cpr/first aid (section 1c) and "remaining" hours (section 1d).
3. Sections (2) (b-f) have the maximum number of hours, which is currently 8 hours, deleted as only four hours is now allowed in this "remaining" hours category.

### 1. Ethics -- "Roles and Boundaries"

WSMTA recommends that "roles and boundaries" be made a suggested topic of ethics and not a requirement. The "roles and boundaries" is a left over from NCBTMB's ethics requirement which Washington's Board of Massage mirrored when it created an ethics requirement about 7-8 years ago. However, NCBTMB no longer has this as a requirement, so we strongly encourage the Board to make it a possible topic and not a requirement.

### 2 and 3. Clarification of Section 2 and "Remaining" Hours is Now Equal to 4 Hours

There is a question as to whether Section 2 only relates to the remaining hours as defined in section 1d, or if it applies to the whole CE WAC and also relates to ethics and CPR/First Aid. In section 1d, it reads:

*"The Remaining hours may be met by meeting the requirements in subsection (2) of this section."*

The maximum allowable hours for multimedia, distance learning and service on massage related boards/committees have all been calculated by taking the total amount of CE hours and subtracting the amount of hours set aside for supervised massage skill training, ethics and now CPR and First Aid.

Originally, the maximum allowable for the "Remaining" hours category in 1d was 12 hours (24 hours - ~~8~~ hours hands on - 4 hours ethics) which matched the maximum allowable 12 hours for multimedia, distance learning and service on massage related boards/committees that was in the WAC.

Before CPR/First Aid were added, the Board of Massage changed the maximum allowable for the "Remaining" hours category in 1d to 8 hours (24 hours - 12 hours hands on - 4 hours ethics) which matches the current revised maximum allowable 8 hours multimedia, distance learning and service on massage related boards/committees.

However, the addition of CPR/First Aid as a required CE category ensures that 4 hours will always be reported for CPR/First Aid, because a) both topics together are 4 hours or longer in study/testing and b) CPR/First Aid cards generally expire after 1 or 2 years. So it's a given that all LMTs will be reporting their maximum 4 hours each reporting cycle.

This then changes the maximum allowable for the "Remaining" hours category in Section 1d to 4 hours (24 hours - 12 hours hands on - 4 hours ethics - 4 hours CPR/First Aid).

The question is now -- should the maximum allowable for multimedia, distance learning, service on massage related boards/committees, teaching a course for the first time and business courses be now limited to 4 hours because that is the total allowable remaining hours? Or, does Section 2 apply to supervised massage skill training, ethics and now CPR and First Aid as well as the "Remaining" hours? Please clarify because it is confusing since the information in section 2 is presented as if represents the maximum allowable for all of Section 1, but in reality the calculations for maximum allowable hours are only done by calculating the "Remaining" hour category.

WSMTA's recommended WAC changes are on the following page to keep everything on a single page. I have highlighted the maximum 8 hour sections in yellow for ease of finding the details.

## WSMTA's WAC 246-830-475 Recommended Language Changes:

- DOH's current amended WAC language
- WSMTA's changes and deletions are in Red and italicized and bolded (WSMTA comments in red)

### WAC 246-830-475 Continuing education requirements.

- (1) To renew a license, a massage therapist must complete twenty-four hours of continuing education every two years consistent with WAC 246-12-030. Continuing education must be provided by an individual who has at least three years of professional experience in the subject area being taught.
  - (a) A minimum of twelve hours must be in person and directly supervised involving the participation of the direct application of massage therapy; direct supervised massage skills training; and
  - (b) A minimum of four hours must be in professional ethics, communication, or Washington state massage laws, ~~and regulations, and roles and boundaries.~~
    - ~~(i) Two of these hours must include professional roles and boundaries; and~~
    - ~~(ii) A maximum of two hours per reporting period may be met by attending a Washington State Board of massage meeting in person.~~
  - (c) Maintain certification in American Red Cross first aid and American Heart Association CPR or the equivalent. A maximum of four hours is allowed per reporting period.
  - (d) The remaining hours may be met by meeting the requirements in subsection (2) of this section.
- (2) For the purposes of this chapter, continuing education is defined as any of the following activities reasonably related to massage therapy knowledge, skills, and business practices:
  - (a) Documented attendance at a local, state, national, or international continuing education program or conference
  - (b) Self-study through the use of multimedia devices or the study of books, research materials, and/or other publications.
    - (i) Multimedia devices. The required documentation for this activity is a two-page synopsis of what was learned written by the licensee. **A maximum of eight hours is allowed per reporting period.**
    - (ii) Books, research materials, and/or other publications. The required documentation for this activity is a two-page synopsis of what was learned written by the licensee. A maximum of two hours is allowed per reporting period.
  - (c) Teaching a course for the first time, **not to exceed eight hours.**
  - (d) Business and management courses, **not to exceed eight hours.**
  - (e) Distance learning. Distance learning includes, but is not limited to, correspondence course, webinar, print, audio/video broadcasting, audio/video teleconferencing, computer aided instruction, e-learning/on-line learning, or computer broadcasting/webcasting. **A maximum of eight hours is allowed per reporting period.**
  - (f) Active service on boards or participation in professional or government organizations specifically related to the practice of massage. **A maximum of eight hours is allowed per reporting period.**
- (3) A massage therapist must provide acceptable documentation of attendance upon request or audit. Acceptable forms of documentation include but is not limited to:
  - (a) Transcripts;
  - (b) A letter from the course instructor or the organization providing the continuing education;
  - (c) Certificate of attendance or completion; or
  - (d) Other formal documentation that includes the following:
    - (i) Participant's name;
    - (ii) Course title;
    - (iii) Course description;
    - (iv) Date or dates of course;
    - (v) Number of hours;
    - (vi) Indication of being an in person course, home study, distance learning, multimedia or live webinar;
    - (vii) Instructor's name or sponsor organization name or names;
    - (viii) Instructor or sponsor contact information; and
    - (ix) Signature of the program sponsor or course instructor. Multimedia courses are exempt from this requirement.
- (4) Massage therapists who maintain an active status Washington state massage license and reside and practice outside Washington state must meet all continuing education requirements.

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