



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

November 17, 2019

**To:** WSMTA Board of Directors and Members

**From:** WSMTA Government Relations Program Director, Robbin Blake, LMT (rblake@mywsmta.org)

**Re:** November 15, 2019 Board of Massage (BOM) Meeting Notes

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**Board Members Present:** Heidi Williams LMT (Chair), Anthony Sharpe (public member), Tonya Cox LMT, Chelsea Giles LMT (new member)

**School Program Reviews:** Altura College and Bellevue Massage School (651 hour program, transfer program and Bilingual program) -- approved

**Special Meeting:** This meeting was billed as a "special meeting" and not a rescheduled meeting of the cancelled November 1 Board of Massage Meeting. The purpose of this meeting was primarily to discuss a few outstanding WAC rule issues. Here are the WACs that were discussed:

**WAC 246-830-035 Licensing by Endorsement**

WAC 246-830-035 Licensing by Endorsement subsection (1)(a)(i): states, "...a minimum of six hundred twenty-five hours completed at a rate of no more than six classroom hours per day and no more than thirty classroom hours per calendar week and approved by the equivalent..." was replaced with:

"a minimum of six hundred twenty-five hours to be completed in no fewer than 24 weeks and approved by the equivalent..."

The language "completed at a rate of no more than six classroom hours per day and no more than thirty class-room hours per calendar week and" had been added at the prior BOM meeting in September. There was much disagreement about this language from the audience members for a large variety of reasons. Prior to the September BOM meeting there had been no time requirement on LMTs transferring from outside of WA to WA state in this WAC's revision language. There has never been a time restriction in this WAC's language.

Also, at the prior meeting, one of the audience members made mention that several Florida schools programs would not have been accepted under the revised WAC if the minimum requirement for school completion was six months. Six months can have a different amount of weeks depending on which months are in the time period, so a school might not be acceptable depending on this conversion from weeks into months. Therefore, the BOM accepted 24 weeks as the new standard in place of the most recent language.

The BOM chose to keep a minimum standard of time as a protection of the general public against those people transferring in, mostly right out of massage school, which little or no experience who might have gotten their massage schooling through a diploma mill.

An issue with setting a minimum time period for completion of one's massage school education is that if an out-of-state LMT completed their massage school in 23 weeks and not the 24 weeks then they would not qualify for licensing by endorsement. They would have to be evaluated through the transfer program of a nearby massage school. These programs evaluate students massage school transcripts to see what portion of their education can transfer into WA state and then they would test the student for competency. What then does an out-of-state LMT make up to qualify for admission since they completed and passed their massage school education that satisfied WA State's massage education requirements, they just happened to do it 1 week quicker than WA state's minimum? Sitting in school to randomly take classes for one week does not seem like an appropriate make up. So there would need to be a process for these people. WSMETA proposed that the BOM should research to see what other states are doing to ensure that they aren't arbitrarily excluding licensed massage therapists from other states if a large number of states do not have minimum time requirements for the completion of their massage school programs.

WAC 246-830-035 Licensing by Endorsement subsection (1)(a)(i): states, "A minimum of five hundred hours completed at a rate of no more than six classroom hours per day and no more than thirty class-room hours per calendar week and approved by the equivalent licensing agency or agencies in the state, territory, or foreign jurisdiction in which it is location at the time of applications graduation and at least two years of experience, and documentation of at least twenty four hours of continuing education within two years prior to making application." It now states:

"A minimum of five hundred hours completed at a rate of no more than six classroom hours per day and no more than thirty class-room hours per calendar week and approved by the equivalent licensing agency or agencies in the state, territory, or foreign jurisdiction in which it is location at the time of applications graduation and at least two years of experience, and documentation of at least twenty four hours of continuing education within two years prior to making application."

In essence, those who have completed at least a 500 hour program and have 2 years of massage experience do not have a time restriction on how much time their massage program was completed in. The thought was that the experience made up for people who had programs that completed quicker than WA State's 24 week endorsement minimum.

#### **WAC 246-830-430 Education and training**

WAC 246-830-430 Education and training. subsection (1) states: "...These ~~five~~ six hundred twenty-five hours are to be completed at a rate of no more than six classroom hours per day and no more than thirty classroom hours per calendar week and not to be completed in less than six months and must consist of the following minimum requirements:" It now states:

"...These ~~five~~ six hundred twenty-five hours are to be completed in no fewer than 24 weeks and not to be completed in less than six months and must consist of the following minimum requirements:"

#### **WAC 246-830-440 Curriculum-Academic standards-Faculty-Student clinic**

WAC 246-830-440 Curriculum-Academic standards-Faculty-Student clinic. subsection (1) states: "The curriculum of the massage school, massage program, transfer program or apprenticeship program must be designed and presented to meet or exceed the required ~~five~~ six hundred twenty-five hours completed at a rate of no more than six classroom hours per day and no more than thirty classroom hours per calendar week." It now states:

"The curriculum of the massage school, massage program, transfer program or apprenticeship program must be designed and presented to meet or exceed the required ~~five~~ six hundred twenty-five hours in no fewer than 24 weeks and at a rate of no more than six classroom hours per day and no more than thirty classroom hours per calendar week."

The changes in WAC's 246-830-430 and 246-830-440 were to keep the consistency of the new language of "no fewer than 24 weeks" in WAC 246-830-035.

## **WAC 246-830-475 Continuing Education requirements**

WAC 246-830-475 Continuing Education requirements subsection (1) states: "... The board relies on the integrity of the individual receiving the continuing education to obtain an appropriate massage therapy learning experience." This was changed to:

"Massage Therapists are responsible for ensuring the continuing education they complete meets the requirements in WAC 246-830-475."

The Assistant AG recommended that more direct language should be used to indicate that massage therapists were responsible for the CE they took in complying with this WAC.

WAC 246-830-475 Continuing Education requirements subsection (2)(b)" states: ".... A maximum of two of the four hours may be met by attending a board meeting in person;" this was changed to:

"...A maximum of tTwo of the four hours may be met by attending a board of massage meeting in person; a maximum of one hour is allowed per board meeting."

WAC 246-830-475 Continuing Education requirements subsection (3)(c)" 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 or ganization. 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 licen-see. The time spent writing a synopsis is not reportable. ~~two page syn-opsis of what was learned written by the licensee.~~ A maximum of two hours is allowed per reporting period." This was changed to something similar to the following -- unfortunately, I did not copy down the exact language:

"(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 two reports may be submitted per reporting period."

The reason for the change was to streamline the wording and to give weight that reading research and self study are valuable tools.

One additional topic was discussed at the BOM meeting, and that was the timing of the effective dates for the change of the minimum massage education hours from 500 to 625 and the new CPR requirement in the continuing education section. At the prior meeting 6 months was discussed. But WSMTA suggested that DOH's Board of Massage support members should contact the schools to determine when they would be able to change over based on the Governor potentially signing off on a CR103 as early as summer 2020 instead of guessing what it could possibly be since it takes 6-12 months to market a massage program. WSMTA also brought up the thought of grandfathering in programs that would be unable to complete students to graduation by a set effective date that might be arbitrarily set.