



ADVOCATE FOR MASSAGE THERAPY AS A RECOGNIZED AND RESPECTED HEALTHCARE PROFESSION

November 14, 2017

To: Reynaldo Guajardo, LMP, 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 246-830-430 Education

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

- Washington State should mirror its massage education and training programs to the ELAP recommendations in both hours and program content (as recommended by AMTA-WA), with an additional 125 hours for a total of 750 hours.
- The additional 125 hours shall be in support of additional evaluation, clinical reasoning and treatment of patients/clients with common chronic conditions and injuries, the content is provided on pages 2-3.

Why WSMTA is Promoting More Hours Than ELAP:

As stated in their final report, the ELAP objective was to:

identify and gain agreement on what should be core elements of entry-level massage therapy instructional programs – the knowledge and skills an entrant to the profession should possess to be ready to work safely and competently with clients.

WSMTA has great respect for this project and what it accomplished and we support the ELAP findings to be the base minimum we would want for Washington state massage education requirements if we were not regarded as healthcare providers in our state. Since massage therapists in Washington state are both healthcare providers and afforded the opportunity to work as providers of health insurance plans through the "Every Category of Provider" law, WSMTA believes that our state education standards should include a component over and above ELAP that educates students in the evaluation, clinical reasoning and treatment of patients/clients with common chronic conditions and injuries, but with the components of ELAP as the foundation of any massage education.

In formulating a position, WSMTA looked at what program hours current massage schools in Washington state were providing as well as the number of months they were giving students to complete them in. The table, "WA State Massage School Licensing Programs", lists the massage schools in WA state and sorts them by number of program hours. We also compiled a chart to see what other states had for minimum massage licensing requirements. Please see the table, "State Massage Licensing Requirements" for a listing of states and their minimum hours of massage education for licensure.

The Breakdown of Washington State Massage School Hours and National Minimums

The "WA State Massage School Licensing Programs" table shows that:

- 15 of the 27 massage schools (55.6%) offer 750-hour or higher programs and would only have to conform their content
- 5 of the 27 massage schools, (18.5%) are below the 625-hour ELAP requirement
- 7 of the 27 massage schools (25.9%) are between 625 hours and 749 hours and would have to add not more than 125 hours of content (one school would only need to add 10 hours so it is a wide mix).

The "State Massage Licensing Requirements" table, shows that there are currently only 6 states that have a minimum of 750 hours or higher out of 50. On the other hand there are only 11 states that have 625 hours or higher out of 50. So whether Washington state has a minimum of 625 hours or 750 hours, the impact on portability will be about the same as most states have a 500 hour minimum requirement.

Why WSMTA is Advocating 750 hours:

WSMTA advocates that 125 hours is the bare minimum, over ELAP's 625 hours, to produce massage therapists who can treat patients/clients with common chronic conditions and injuries and do no harm on the general public in a healthcare environment. This is not ideal, it is minimal. The content of the 125 hours was created and reviewed by members and non-members of the WSMTA involved in education with decades of experience in creating curriculum.

The quantity of 125 hours as a minimal number was deemed to be:

- the minimum education required to learn evaluation, clinical reasoning and treatment skills over and above a minimum massage skill level provided by the most base education to treat the clients/patients without doing harm -- **note: approximately 81% of Washington state massage schools are already at a base minimum of ELAP's 625 hours when the state minimum is currently only 500 hours.** This says something about the current minimum of education hours if the vast majority of schools voluntarily offer more than the minimum required. And,
- the least financially burdensome to DOH, schools and potential students as 55.6% of schools are already at or above 750 hours, and it would also increase the amount of federal financial aid available to students to cover the tuition of students at the school with 751-1000 hour programs (currently with a 500 hour minimum, students can only obtain federal financial aid for 750 hours).

WSMTA's Breakdown of the Additional 125 Hours:

WSMTA supports AMTA-WA's adaptation of the 625 hours that they provided in their proposed WAC rewrites for the September 7 Spokane BOM Meeting. Their wording modifies ELAP to fit the state's requirement of clinic hours. From this base, we added 125 hours and added minimums in each section that equals this 125 hours to ensure that the integrity of the 125 hours is maintained and used for the purpose intended instead of being co-opted into other programs.

This 125 hours is for massage school students to learn the assessment, clinical reasoning and treatment of common musculoskeletal pathologies, including but not limited to tendinopathies, strains, sprains and impingement syndromes throughout the body. The 125 hours includes:

- Anatomy and Physiology: 20 hours – regional anatomy, nervous system physiology (general senses, pain), inflammatory process.
- Kinesiology: 15 hours – location and palpation of bony structures, muscles/ligaments and tendons as well as ranges of motion and analysis of function.
- Pathology: 20 hours – common pathologies, contra-indications, cautions, clinical reasoning, relevant research.

- Theory Principles and Practice of Massage: 70 hours – overview of treatment methodology, evaluation techniques, clinical reasoning, technique practice, charting, hydrotherapy.

Note: the items listed in each category is only a suggestion of what could be included in the gross breakdown of hours into 4 main categories. We do not recommend that these items be included in any WAC language.

WSMTA's WAC 246-830-430 Recommended Language Changes:

- The Original WAC is in Blue
- AMTA-WA suggested changes and deletions are in Green and underlined
- WSMTA's changes and deletions are in Red and italicized and bolded

Wherever AMTA-WA's changes/deletions/comments remain, WSMTA supports them and left them in the wording instead of sticking to the original WAC text. The base 625 hour breakdown provided by AMTA-WA remains the same without change, we have simply added our breakdown of 125 hours by category to the AMTA-WA breakdown. To reiterate what was stated in the prior section, we used the minimum hour language to insure that the 125 hours were used for the purpose intended instead of being co-opted into other programs.

WAC 246-830-430 Education and Training.

(1) A massage school, massage program or apprenticeship program education and training must have a curriculum and system of education and training consistent with its particular area of practice. The education and training in massage therapy will consist of a minimum of **five seven** hundred **and fifty** hours. An hour of education and training is defined as fifty minutes of actual instructional time. Certification in American Red Cross first aid and American Heart Association CPR or the equivalent is required. CPR training must be in person. This requirement is in addition to the **five seven** hundred **and fifty** hours of education and training in massage therapy. These **five seven** hundred **and fifty** hours are not to be completed in less than six nine months and must consist of the following:

(a) One hundred thirty **Eighty One hundred** hours of anatomy, and physiology, to include orientation to the human body, and the integumentary, skeletal, fascial, muscular, nervous, cardiovascular and other body systems. and kinesiology including palpation, range of motion, and physics of joint function. There must be a minimum of forty hours of kinesiology. **A minimum of 20 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(b) Seventy Eighty five hours of kinesiology to include muscle identification and palpation, location and attachment(s), actions, identifications and palpation, actions, range of motion, and joint classification and function. **A minimum of 15 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(c) Fifty Seventy Ninety hours of pathology including to include indications, cautions, and contraindications common pathologies and the impact of massage on those pathologies. consistent with the particular area of practice. (AMTA-WA Note: The word "cautions" is used in the definition of "evaluation." It has a different meaning than "contraindications" and we recommend including it in the rules in several places for consistency. We emphasize this point, because the Board rejected our suggestion during previous rule-making.) **A minimum of 20 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(d) Two hundred fifty sixty **Three hundred twenty five** hours of theory, principles, and practice of massage to include techniques, remedial movements history of massage, benefits and effects, techniques and strokes, body mechanics of the therapist, application methods and styles, concepts of basic research, session planning and the impact adaptation of techniques, stages of healing, common pathologies, and considerations relevant to special populations on pathologies. A maximum of fifty of these hours may include time spent in a student clinic. Hydrotherapy must be included when consistent with the particular area of practice. **A minimum of 70 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(e) Fifty hours of mandatory student clinic to be directly supervised as defined in WAC 246-830-005(9), with a ratio of no more than one instructor to six students administering massage. For those education and training programs beyond 625 hours, in no case may the number of student clinic hours exceed 100.

(AMTA-WA Note: We included this language on the limitation on student clinic hours for the protection of students.)

(df) Fifty-Five Sixty hours of clinical/business practices, at a minimum to include hygiene, sanitation, draping, recordkeeping, billing and insurance concepts, medical terminology, professional ethics, business models and management, human behavior, client or patient interaction, and state and local laws relevant to massage and massage businesses.

(g) Forty hours of professional ethics to include the therapeutic relationship of the massage therapist and client or patient, human behavior, communication skills, professional boundaries, standards of ethical practice, and state laws and rules related to massage and health care ethics.

(2) To receive credit in an apprenticeship program for previous education and training, this education and training must have been completed within the five-year period prior to enrollment in the apprenticeship program.

(3) ~~A student attending a massage school, massage program, transfer program or apprenticeship program outside the state of Washington must pass a jurisprudence exam.~~ (AMTA-WA Note: This is a confusing and unnecessary subsection. The bottom line is that passage of a jurisprudence exam is required for all applicants for licensure.)

(4) A massage school, massage program, transfer program or apprenticeship program may exempt a student from curriculum requirements and grant credit or clock hours when the student's successful performance on an examination that the massage school, massage program, transfer program or apprenticeship program administers demonstrates that the student has attained competency in that subject area as a result of prior postsecondary learning or training. Any credits or clock hours granted pursuant to this subsection must be retained in the students record.

Thank you for your consideration,



Robbin Blake, LMP WSMTA Clinical Practices Program Member



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

Table A: Washington State Massage School Programs
as of 10/29/17

#	Massage School	Location	Hours	Months	Notes
1	Cortiva Institute	Seattle & Federal Way	1000 750	10-17 7.5-12	
2	Renton Technical College Massage Program*	Renton	990	9	
3	Sage Academy of Massage and Bodyworks	Moses Lake	900 740		7
4	Victoria's Academy of Cosmetology	Kennewick	945	10	
5	Whatcom Community College*	Bellingham	858	8	
6	Carrington College – Spokane*	Spokane	786		
7	Alterius formerly Everest College	Everett & Tacoma	780/750	9	
8	Altura College	Tacoma	750	9	
9	Ancient Arts Massage School Clinic	Richland	750		7.5?
10	Columbia River Institute of Massage Therapy	Wenatchee	750	10	
11	Day Spa Academy	Yakima	750		
12	Discoverypoint School of Massage	Seattle	750	12	
13	Elite Cosmetology Barber and Spa Academy	Yakima	750 650		6 10
14	Inland Massage Institute, Inc.	Spokane	750	12	
15	<u>Soma Institute of Neuromuscular Integration</u>	Buckley	750		
16	Spectrum Center School of Massage	Lake Stevens	740	10	
17	Alexandar School of Natural Therapeutics	Tacoma	706	11	
18	Denton Massage Program	Marysville	700	10.5	
19	Clover Park Technical College*	Lakewood	660	6	Swedish AA Degree Clinical (in addition to Swedish)
	Note: Clover Park has 3 programs in massage but only CEUs were provided, not hours.				
20	Bellevue Massage School	Bellevue	651	7	
21	Port Townsend School of Massage	Port Townsend	650 525	9 14	
22	Northwest Academy for the Healing Arts	Seattle, Tacoma & Bellingham	644 590 574	7 9 12	
23	Bodymechanics School of Myotherapy and Massage	Tumwater & Vancouver	600	8/12	
24	Tri-City School Of Massage	Kennewick	572		
25	Wellness Education Center	Spokane	608	9	
26	Ananda Massage Training	Mountlake Terrace	510	6	
27	Rainier Massage Academy	Seattle	500		

Note: The information gathered for this report is primarily from school websites and online catalogs. Not all schools displayed their program hours or length of program in their online documentation. In those instances, where online information was unavailable, information was taken from the DOH's website section for massage therapy, where approved schools and their program hours were listed.

* The community colleges had their programs listed in CEUs. 1 CEU of class time generally equals 20 clock hours but unfortunately, hands on technique does not, so it is impossible to tell what their actual hours were unless they also provided clock hours on their website which a several did. Hours not gathered from community college websites, came from DOH's approved massage school listings.

The link for the DOH's approved massage school webpage is:

<https://www.doh.wa.gov/LicensesPermitsandCertificates/ProfessionsNewReneworUpdate/MassageTherapist/EducationRequirements/ApprovedSchools>

Table B: State Massage Licensing Requirements
as of 10/29/17

State	Min Lic'g Hrs	Notes	State	Min Lic'g Hrs	Notes
Maryland****	600hrs + 60CE or, 600	LMP RMP	Delaware or, Florida	500 200 500	MT CMT
Nebraska	1000		Georgia	500	
New York	1000		Idaho	500	
New Hampshire**	750		Indiana	500	
North Dakota*	750		Louisiana	500	
Ohio	750		Maine	500	
Arizona	740		Michigan	500	
Mississippi**	700		Missouri	500	
Alabama	650		Montana	500	
Massachusetts	650		Nevada	500	
New Mexico	650		New Jersey	500	
Oregon	625		North Carolina	500	
Illinois	600		Oklahoma	500	
Iowa	600		Rhode Island**	500	
Kentucky	600		South Carolina	500	
Pennsylvania	600		South Dakota	500	
Utah	600		Tennessee	500	
Wisconsin	600		Texas	500	
Hawaii	570		Virgina	500	
Alaska*	500		Washington	500	
Arkansas	500		West Virginia	500	
California	500		Kansas	None	
Colorado	500		Minnesota	None	
Connecticut	500		Vermont***	None	
DC	500		Wyoming	None	

* Require CPR in addition to hours

** Requires CPR/First Aid in addition to hours

*** Varies by municipality

**** LMP in Maryland is 600 hours of massage School and 60 CE units at college for an associates degree

Note: Most of this information is from the AMTA National website. Several states were missing to include several states with licensing requirements. Information from missing states with licensing requirements was taken from the respective state's board of massage or equivalent.