



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 246-830-035 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:

- That the AMTA-WA's 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)(A)(d) (c) 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 continuing education in massage therapy services.~~ (AMTA-WA Comment: 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.)

We support the revision that AMTA-WA has suggested. When the Board of Massage was discussing this earlier in 2017, one of our WMSTA committee members suggested that out-of-state applicants be responsible for providing 24 hours of continuing education hours to match the requirement that all in-state massage therapists are required to do if they lapse in licensure -- to which the public and BOM/DOH agreed to in that meeting. However, the language that the DOH created and that the BOM approved in the final Public Hearing earlier this year, stated:

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.

This 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 (in black and in italics):

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

(1)(A)(d) (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~~. (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 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,



Robbin Blake, LMP WSMTA Clinical Practices Program Member



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