

Continuing Education in the Massage Therapy Field

*Proposal for an alternative to
state and national regulation*

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Preface

In 2008, I published a white paper entitled *On Becoming a Profession* that provided a systems-level analysis of the field of massage, bodywork and somatic therapies.¹ It included specific recommendations for policy changes that were needed to address serious issues that have emerged as the result of rapid expansion without coordinated planning. Five years later, there has been progress on several fronts, but most of the structural problems remain in place.

This document is intended to address one particular issue that is demanding attention at this juncture: **the regulation of continuing education for massage therapists.**

(Note: For ease of use here, I will use the term "massage therapy" as a broad reference that includes "bodywork" and "somatic therapy".)

Continuing education (CE) requirements in the massage field are inconsistent, as is the case with standards for entry-level licensure. The National Certification Board for Therapeutic Massage & Bodywork (NCB) has conducted a CE provider approval process since the 1990's that has been utilized by a majority of state massage boards that require CE for license renewal. There are also five state boards that administer their own CE approval processes.

In November 2012, NCB announced sweeping changes to its CE approval program,² which have been the subject of wide-scale objection from the CE community. Along with this shift, the Federation of State Massage Therapy Boards (FSMTB) recently announced that it is starting work on the development of its own CE approval program, on behalf of its Member Boards. These two organizations have been unwilling to work together to forge a unified solution, which means that the individuals and institutions that provide continuing education face the prospect of increased redundancy and cost in meeting regulatory requirements. This is unacceptable.

Before NCB and FSMTB continue any further down their respective pathways, we must address and get frank answers to these interlocking questions:

1. *Should continuing education be mandatory for renewal of state licensure – and is it essential for the ongoing protection of the public?*
2. *Given the reported inconsistencies in the instructional design and delivery of CE courses, is it even possible for an approval process to provide quality assurance?*
3. *Does the cost of compliance for CE providers (both in terms of time and money) bring an equal or greater benefit to the massage therapy field, and to the public at large?*
4. *What kind of regulatory process – if any – is needed; and which organizational entity is best suited to perform this function?*

In this paper, I offer my own perspective on these questions and propose an alternative solution to regulation by NCB and FSMTB: **The National Continuing Education Registry.** To support the process of discussion, collaboration and decision making, this proposal is being sent to the leaders of the following stakeholder organizations: ABMP, AFMTE, AMTA, COMTA, FSMTB, Massage Therapy Foundation and NCBTMB.

In this era of Twitter feeds and sound bites, I must advise the reader that this is a lengthy document. In dealing with a complex issue such as this, it is important to provide enough background information and references to be able to understand how the field got to this point, what is at stake, and why the proposed solution is the best course of action. If you want to get right to the solution, you'll find it on page 15. Then you can meander back through the body of the paper to see how it all fits together. The Notes section at the end contains comments as well as hyperlinks to the resources cited.

This proposal is an independent project. No organization asked me to write it and no one compensated me for my time. I do these things because I believe passionately in the healing power of touch, and I want to see the organizations and institutions in our field nurture and not hinder the evolution of this venerable tradition.

—Rick Rosen, February 2013

NOTE: As of the publication date of this paper (February 10, 2013), it appears that NCB may be reconsidering certain aspects of its new continuing education approval program and delaying its implementation. This is further explained in Appendix A on page 20.

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Overview and Background Information

In many regulated fields, continuing education (CE) is required for renewal of mandatory licensure. From electricians to physicians, CE is viewed as the mechanism for individuals to maintain and improve their knowledge and skills, *especially where public protection is of real concern*. Requirements for license renewal in a given occupation are established on a state-by-state basis, and are described in each state's laws and rules. Even in professions with 50-state licensure, such as medicine, nursing and physical therapy, CE is not yet a mandate in every jurisdiction. While there is no occupational licensing by the Federal government, specialty certification boards in many professions exist at the national level. Their renewal requirements often include CE, but they only pertain to those who have sought board certification in a given discipline.

At this juncture, specialty certifications do not exist on a large-scale basis in the massage therapy field. The National Certification Board for Therapeutic Massage & Bodywork (NCB) has offered a generalist certification program at the entry level since 1992. However, because this credential has been enmeshed with licensure over this span of time, there is still a considerable amount of confusion about the nature and purpose of these very different types of credentials. (Section III of my 2008 white paper examines this issue in depth.³) NCB has begun the phasing out its entry-level certification program in favor of a new post-graduate credential called *Board Certification*.⁴ This will also be a generalist credential, albeit with somewhat higher eligibility requirements.

As part of this programmatic shift, NCB has announced a substantial reorganization of its system for approving CE providers. As of January 1, 2013, it is now called the *Board Approved Continuing Education Provider Program*,⁵ with its existing *Approved CE Provider Program* to be terminated by the end of 2013. With the addition of mandatory approval of all CE courses, increased requirements for individual CE providers, and the exclusion of organizational providers, NCB's new program represents a radical shift in how CE is regulated. Refer to **Appendix A** on page 20 for a detailed analysis of the concerns about this new system, and the damaging effects it may have on the CE community.

Why does NCB continue to have such a great impact on our field, when it has lost much of its market share of entry-level testing to FSMTB and the Massage & Bodywork Licensing

Examination (MBLEx)? The reason is that three-fourths of the states that require continuing education for license renewal are utilizing the NCB approval program – either in whole or in part. (See **Appendix B** on page 23 for a breakdown of CE requirements by state). Thus, NCB has control over the bulk of CE approvals, but it is not accountable in any way to other agencies or institutions. This structural lack of oversight has been the source of numerous problems during NCB's reign.

Of the 45 jurisdictions in the massage therapy field that regulate massage (43 states plus D.C. and Puerto Rico), 33 require continuing education for license renewal. Five states have regulations under development, and seven states have no CE requirements for renewal. Of those 33 states that currently require CE, 13 of them use the existing NCB Approved CE Provider program to determine what constitutes approved CE. 12 more recognize the NCB program in addition to state approval processes and other CE sources. Five states have their own CE approval process and do not recognize the NCB system, and three states have no specific CE approval standards (other than the course being relevant to the licensee's scope of practice).

In addition to all the licensees who practice in states that are tied to NCB's CE approval system – combined with the nearly 80,000 massage therapists across the country who have maintained a National Certification credential and have needed ongoing CE for recertification – there are a significant number of other stakeholders who are affected by NCB's policies. These include:

- Individual CE providers who offer face-to-face and/or online CE courses
- Schools of massage, bodywork or somatic therapy that sponsor CE workshops with outside providers or that offer workshops taught by their own instructors
- Private training organizations, businesses or spas that employ or contract with teachers to present their own proprietary courses
- Membership associations (like ABMP, AMTA and AFMTE) that offer face-to-face and/or online CE courses; these may include sponsored courses that are presented at live conferences or webinars with material that is owned by the presenter, or courses based on material owned by the association
- State agencies that regulate the practice of massage therapy – that rely upon the NCB continuing education approval process in lieu of having their own individual state approval processes

When an agency is considering changes to standards or procedures that would affect its stakeholders, it is common practice in virtually all domains of regulation (in both governmental and private non-profit sectors) that such changes be put out for public comment. In this case, the leadership of NCB developed and rolled out its new CE approval program without giving its stakeholders an opportunity to provide feedback. It is unthinkable that a change of this magnitude would be implemented without allowing these individual CE providers, organizations and state regulatory boards an opportunity to weigh in on the proposed program.

While NCB has been renovating its CE approval system, the Federation of State Massage Therapy Boards has been looking to build its own process for CE approval on behalf of the state massage boards that are its members. FSMTB convened a "task force" consisting of its own reps, along with leaders of AFMTE, ABMP and AMTA to map out a strategy for a unified approval program that would regulate both providers and courses.

The proposal that emerged from this workgroup in March 2012 was called *Maintenance of Continued Competency*.⁶ Unfortunately, it did not match up with the publicly stated goals for this project. Instead, the MOCC plan would arbitrarily divide the existing continuing education landscape into two new categories (reprinted here verbatim from the Federation's proposal):

- 1) **Maintenance of Core Competence** – the aspect of continued competence that maintains the entry level of competence to practice safely and knowledgably over time.
- 2) **Professional Development** – Activities including continuing education that raise the level of professionalism for the massage & bodywork practitioner. An example of these activities may be maintaining membership or participation in a professional organization.

FSMTB would be the exclusive provider of online, no-fail courses in "Ethics and Professional Practice" (EPP) to be required for license renewal that focused on so-called public safety issues. All other courses – under the broad heading of "Professional Development Activities" (PDA) – were deemed to be voluntary and would NOT be required for renewal of state licensure. Immediately following the release of the MOCC proposal, a wave of negative comments ensued, including a scathing repudiation of the plan from AMTA.⁷ (If it seems odd that one of the participating organizations in this task force would turn around and hang the plan out to dry, consider the fact that FSMTB rushed the proposal out the door before giving the boards of directors of AMTA and AFMTE, as well as the Federation's own Member Boards, an opportunity to review the document and make comment.)

As the MOCC proposal failed to launch, the leadership of FSMTB quietly went back to the drawing board to reexamine the program. The organization released a revised position statement in the Fall of 2012, entitled, *Standardized Licensure Renewal Recommendation for Continuing Professional Competence*.⁸ It's basically a softened version of the MOCC, which still contains the division between EPP and PDA's. The only significant difference here is the suggestion to state boards that they may choose to make PDA courses a renewal requirement *at their discretion*. FSMTB is now recommending a minimum standard of six CE hours per year for license renewal (even though the average among all states is 10.34 hours), but it would still be the developer and provider of EPP courses. Here is its official recommendation:

Licensed massage and bodywork therapists will be required to complete six hours of license renewal requirements annually. At least three of the six hours must meet the State-sponsored Ethics and Professional Practice course requirements that

specifically address content pertaining to public safety. The remaining three hours could be exchanged for certain Professional Development Activities, including but not limited to meeting accredited certification standards, community service, and research.

In this system, FSMTB would own the domain of Ethics and Professional Practice courses, which would put it into direct competition with ethics courses that have been offered by many CE providers. Furthermore, these recommendations open up a plethora of new activities that could potentially be accepted by state boards in place of traditional continuing education courses. This include serving on the committee of a massage association, giving massage at a charity fund raising event, or taking/retaking a certification exam. These kinds of professional development activities may be beneficial to a therapist's practice, but should they be allowed to be used for license renewal? This will discussed below.

FSMTB recently established a Licensure Renewal Committee, which is moving forward in early 2013 with the development of a new CE approval program and EPP courses. Of course, it will be up to each state massage board to choose whether or not to adopt these new standards. Other than the call for comment on the MOCC proposal, FSMTB has taken this major action step without seeking input from the CE community – the group of stakeholders who would be the most impacted. As well, the long-standing CE approval program administered by NCB is being ignored by FSMTB, as the two organizations have not been able or willing to work together.

This is a tremendous problem: instead of moving towards a consolidation of the various CE approval programs run by state boards and NCB into a single and unified national approval system, FSMTB is stubbornly pursuing its own parallel solution. **This will add an unneeded and unwanted layer of regulatory cost and burden to providers of continuing education.** Many CE providers are already struggling with the challenges of the marketplace. The addition of a whole new set of requirements from FSMTB – on top of the unwarranted changes NCB has announced – could force some providers out of business. As well, some providers who serve practitioners outside the massage therapy field may simply walk away from these CE approval programs if the regulations become more onerous. In both these cases, massage therapists would have fewer CE options from which to choose.

Efforts have been made to get NCB and FSMTB to collaborate instead of compete. With the proper kind of legal agreements and institutional oversight in place, either organization could administer a CE approval program that could be used by the other. This option would eliminate the maddening redundancies and costs now borne by CE providers. It sounds straightforward, but what is making it so hard for these to players to get together? There is a lot of bad blood here, as FSMTB was responsible for knocking NCB out of its lucrative and powerful position as the administrator of nearly all entry-level testing in the massage field. NCB responded to the introduction of the MBLEx in 2008 with a protracted scorched-earth

campaign to keep state boards from adopting the Federation's new exam. Not only did this effort fail, it nearly bankrupted NCB and damaged many relationships beyond repair.

As noted blogger, author and CE provider Laura Allen observed in her post on January 8, 2013, "NCB is operating from **hubris** (not to mention cluelessness), as they continue to put forth wrong-headed initiatives for the field ... The leadership of the FSMTB would rather see NCB fail than lift a hand to help them. They appear to be bearing a huge **grudge** over the way NCB has treated the Federation, and their unwillingness to move beyond that is stopping progress at the whole-profession level."⁹

Since we are at an impasse where the organizational dynamics are blocking progress towards an optimal solution, it's time to put aside the status quo and any assumptions – and examine the fundamental considerations that are really at issue here. Addressing the four questions I posed in the Preface will provide a useful framework to analyze and understand what is at stake here; the answers will point us towards a novel alternative to the existing situation.

1. Should continuing education be mandatory for renewal of state licensure – and is it essential for the ongoing protection of the public?

In order to examine this question about CE, we must look first at the rationale for state regulation of occupations, as well as the status of entry-level education in the massage therapy field. The primary purpose for licensing laws is to protect the health, safety and welfare of the public. To convince a state legislature to enact a law to make licensure mandatory in a particular field, it must be demonstrated that the unregulated practice of that activity would present a danger to the public. For example: if an unlicensed electrician wired your house improperly, you could get electrocuted by plugging in a toaster. An unlicensed physician could cause injury or death in myriad ways. In light of the documented hazards posed by many occupations, the mandate and mantra for licensing boards is *Public Protection*.

Is it appropriate to treat massage therapy in the same way? After all, there is scant evidence to uphold the assertion that the unlicensed practice of massage therapy is harmful to the public. It's a story line (some would say a mythology) that has been used as the justification for convincing governmental officials over the past two decades that new license laws were needed. In reality, **massage therapy is a non-invasive practice where the incidence of serious physical injury is exceedingly rare**. This applies to both therapist/client interactions and teacher/student interactions in massage schools and CE seminars. The kind of problems that show up tend to cluster around clients getting burned with hot stone applications, and ethical issues in the crossing of sexual boundaries.

In the 35 years I've been in this field, I've not heard of an instance of massage causing death to a client. Doing a Google search on "massage death" brings up very little in recent years: a case of a woman getting strangled at home by a neck massage machine, a toddler getting

crushed under a therapist's hydraulic massage table, and a heavy metal band from Hong Kong called *Molten Lava Death Massage*.¹⁰ (Play this at your own risk as background music for your next massage session.)

I must admit to playing a role in one of those good-faith efforts to get a state massage law passed. From 1993-98, I was part of a group that lobbied the North Carolina General Assembly, and we gave testimony before a number of committees in support of the legislation. Our six-year quest for licensure was always justified by fervent claims that there was "significant potential for injury from the unlicensed or unethical practice of massage therapy". Today, we have to consider that statement to be unfounded. However, we fully believed it back then and were able to convince legislators it was true. A similar exercise was repeated in every state where licensure has been obtained over the past two decades.

The classic "potential for harm" lobbying strategy ran into a brick wall in Vermont three years ago, when AMTA and ABMP linked arms in an effort to get a massage law passed in that state. The Vermont Office of Professional Regulation carefully weighed the evidence provided in the sunrise document by these two membership associations and ruled that licensure would not be adopted because: "The applicants (AMTA and ABMP) have not demonstrated that the unregulated practice of massage therapy can clearly harm or endanger the health, safety or welfare of the public. The potential for harm is remote and speculative."¹¹ Read the Vermont OPR's entire five-page opinion; it separates fact from fiction.

Just as we now understand that massage therapy does not remove lactic acid from muscles,¹² we must update our story line around the purpose for state regulation. I am not suggesting here that existing massage laws be eliminated, but we must be honest with ourselves, fellow health care providers and the public.

We have a unique opportunity to reframe regulation in a positive way by changing its fundamental rationale from "Prevention of Harm" to the "Provision of Good". Within existing massage laws, state boards can use their legislatively-granted authority as a means to support the ongoing and incremental improvement of the quality of services provided to the public. I'm suggesting a paradigm shift here, not a change to state statues (at least for the time being).

There is always the potential for harm. Just waking up each morning brings forth new possibilities for bad things to happen. But **since there is little actual harm to be prevented in the delivery of massage services, mandatory CE for license renewal is of negligible value in ensuring public safety.** Instead, we have an opportunity to *help therapists get better at what they do* through continuing education – which is more important and relevant than trying to prevent harm that rarely occurs. Based on that, I believe it is important to keep CE requirements in place, and for them to be added to the remaining states where it is not yet required.

Mandatory CE is necessary because the rapid increase in the number of state massage laws has been followed by a corresponding growth in the number of massage schools – much of it at the lower end of the quality spectrum. It's an example of the *Law of Unintended Consequences*: in the rush to advance the massage profession and protect the public, the practitioner base has grown significantly larger but the average level of competence is lower than ever. There is not yet a research study to confirm this phenomenon, but its existence is well-known. I've heard the complaint innumerable times: "It's difficult to find a good massage these days." As well, I've heard many employers bemoan the challenge of how hard it is to find skilled therapists to hire.

The decline in the quality of massage services delivered to the public, and the early burn-out rate for new graduates entering this field is the direct result of chronic shortcomings in entry-level training programs. Author and CE provider Ralph Stephens addressed this in his column entitled *ELAP and the Seven Deadly Sins of Massage Education* in the August 2012 issue of *Massage Today*.¹³ Section II of my 2008 white paper presents a more detailed analysis of this issue.¹⁴

The problem is not with the number of curriculum hours (which we recognize as being lower than what is required to enter other health care fields). It lies with inconsistent and ineffective curriculum design and delivery. This problem stems from the fact that only a small percentage of educators in this field have received formal training in the theory and methodology of teaching and instructional design. Being a good therapist does not necessarily translate to being a good teacher.

Improving curricula in massage schools is the subject of the *Entry Level Analysis Project*, currently being spearheaded by ABMP and AMTA. The issue of teacher training is the focus of the *National Teacher Education Standards Project*, a long-term effort being conducted by the Alliance for Massage Therapy Education. AFMTE has just published its *Core Competencies for Massage Therapy Teachers*,¹⁵ which provides a comprehensive description of the knowledge, skills and attitudes teachers need to provide effective instruction. These standards apply to the teaching of CE as well as entry-level programs.

Real and lasting improvement to the quality of education and clinical practice in our field will not occur until our teacher corps gets the training needed to meet these competency standards. This will take the active support of all sectors of the massage industry.

If continuing education was not mandatory for license renewal, how many therapists would still take courses? There is no survey data on this question, but I estimate that about a third would never take another CE course, another third would take a course on occasion when there was something they wanted to study, and the remaining third (the dedicated lifelong learners) would remain engaged in CE on a regular basis. With this in mind, CE requirements are beneficial because the roughly two-thirds of therapists who shy away from CE are often the ones who most need this to improve the services they provide to their clients.

Author and CE provider Whitney Lowe affirmed the importance of ongoing CE for practitioners in a November 2012 article in *Massage Today*. He said, "CE develops clinical competence. It is through the gradual and continual efforts to develop clinical competence that a massage therapist develops their professional skills to a level sufficient to treat clients with musculoskeletal conditions." ¹⁶

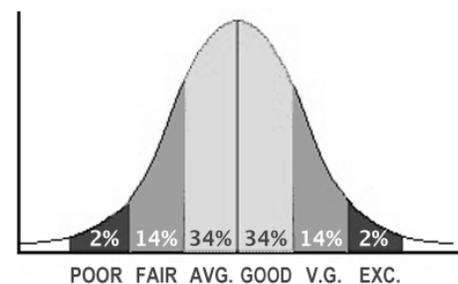
Here's another urban legend that needs to be dispelled: "It doesn't matter where you go to massage school – you learn what you really need to know in CE workshops." Nothing could be further from the truth. As we know from the process of human growth and development, the formative stage is the most critical. Birth trauma or early privation can stunt a person for life. In the same way, the patterns and behaviors students learn in their entry-level training set the framework for their professional careers. Competencies within a program that are missed or learned improperly will lower the quality of massage delivered to clients, and will predispose therapists to an early departure from the field because they are unable to handle the physical and/or emotional demands of the job.

In addition to augmenting therapists' knowledge and skills, CE can play an essential role in assisting those who need to shore up gaps resulting from their foundational training experience. That's where mandatory CE supports the "Provision of Good". It's beneficial for therapists... and it's good for the public as well.

2. Given the reported inconsistencies in the instructional design and delivery of continuing education courses, is it even possible for a CE approval process to provide *quality assurance*?

There are no prerequisites for becoming a CE provider – other than having knowledge about the subject matter of a given course, and holding a massage license if the course involves hands-on work. There are no requirements in most jurisdictions that the provider is competent in the design and delivery of continuing education. As noted above, the lack of formal teacher training found among most entry-level and post-graduate instructors is a cause for great concern (and timely action).

In the absence of such standards, CE courses range in their quality and effectiveness from the excellent to the poor. They probably follow a normal-distribution bell curve, with a majority of courses being in the range of average-to-good. But the inconsistency of instructional competencies of CE providers, combined with issues around course design, mean that a state or national CE approval process that merely requires providers to submit paper documentation is insufficient. *Anybody or anything can look good on paper.* It would take a far more rigorous accreditation-level process to verify the



competency of every provider and the integrity of curriculum design for each workshop. Neither regulators nor providers are in a position to handle the costs and demands of such a regimen.

What's more, **it is not possible to assure quality when it is not there to begin with.** It's public deception to put forth an agency "seal of approval" that is not a reliable predictor of what the customer will receive.

As a case in point: NCB's published descriptions of its new Board Approved CE Provider Program emphasize the fact that the new standards will "advance the quality of continuing education", and will "meet our profession's needs for assured value in CE". These are attractive-sounding promises, but they are impossible to deliver in the foreseeable future, given the current baseline level of teaching in this sector. NCB will not solve this deficit by merely requiring CE providers to provide more documentation of their qualifications and courses.

FSMTB may not matching NCB's hype, but its CE approval system would be based on an entirely untested concept of separating continuing education into two domains. The organization will be crafting its own Ethics and Professional Practice courses to "...address competencies for safe and professional practice and areas identified as requiring regulatory intervention and guidance." There is no need for such courses, because this subject matter is already well-covered by a wide range of CE offerings currently on the landscape. Furthermore, state boards are in the *enforcement* business, not the *education* business. This kind of activity would constitute unfair governmental intrusion into the private sector.

Instead of creating new online ethics, hygiene or safety courses that already-licensed therapists would be required to take, FSMTB should use its resources to encourage entry-level massage programs to bring stronger emphasis to course work in ethics, communication skills and the dynamics of the therapist/client relationship. FSMTB could make a positive contribution by working with the school community to develop model curricula in this area.

FSMTB is treating everything outside of EPP to be "professional development" which would fall to the domain of membership associations and voluntary certification organizations. Its description of this standard fails to mention the largest area of continuing education: courses provided by independent providers and institutions dedicated to CE. And as noted before, FSMTB is proposing that state boards accept volunteer activities for license renewal in place of traditional CE courses. I do not believe this is a sound strategy, because the gaps that exist in many therapists' knowledge and skills will not be addressed by participating in such activities.

The CE approval systems being proposed by both NCB and FSMTB would rely upon committees of volunteer massage therapists and educators to handle the key functions of review and approval of applications submitted by providers. This kind of workflow created numerous problems at NCB in past years, as the primary commitments of volunteers are their own business activities. Volunteers may also lack needed technical skills and knowledge. Processing

delays of many months and inconsistent decision making by well-meaning volunteers cost CE providers dearly. Critical tasks like this require well-trained and dedicated staff to handle core responsibilities in a timely and professional manner.

In taking a frank look at the current status of the continuing education sector, **it's not possible to assure the value or quality of CE until the product itself improves.** The truth is that NCB and FSMTB only have the scope and resources to administer a *credibility assurance* process at best – but not a *quality assurance* process. A credibility assurance process would offer a simple means to verify that providers exist as a legitimate business entity, and that they are offering one or more CE courses that meet certain minimum subject matter standards.

3. Does the cost of compliance for CE providers (both in terms of time and money) bring an equal or greater benefit to the massage therapy field, and to the public at large?

In a word, *no*. With one national CE approval process run by NCB and five separate state board CE approval processes to contend with, providers who offer courses across the country already have redundant requirements that are expensive to maintain and that consume valuable time and resources. Since the quality assurance and public protection claims of these approval processes are dubious at best, there are not enough demonstrable benefits to justify the cost of compliance for providers.

Now we are facing two huge additions to the burden side of the ledger for providers: NCB's new and expanded Board Approved CE Provider Program will require providers to have every one of their courses approved, in addition to a requirement that every instructor within a training organization must apply for and receive his or her own approval. This represents a sizeable increase to the regulatory burden for providers. NCB may be starved for cash in the wake of ever-declining exam revenues, but it's wrong to squeeze the pocketbooks of those in the CE community in an effort to remain financially viable.

The new CE approval program being developed by FSMTB would add another national-level scheme to the mix, which is the last thing providers need. If this comes to fruition, providers would have one set of approval requirements for courses that would be used for recertification with NCB, and another for licensure renewal by state massage boards. Even if FSMTB builds this program, there is no assurance that all of its Member Boards will change their rules to adopt it. It's likely that there will be a few holdout states that keep their own approval requirements, along with redundant national programs.

Let's face the facts here: neither massage clients nor participants in CE workshops are getting maimed or worse by what CE providers do in their classrooms. Most continuing education is being delivered at a basically-acceptable level of competency, with only a tiny fraction of courses being problematic in any way. The extreme requirements contained in NCB's

new approval program are unwarranted at any price, as it seeks to fix problems that are simply not there. By choosing to ignore the existing NCB approval system and building one of its own, FSMTB would not only adding regulatory burden, it would be competing head-to-head with CE providers in the delivery of courses related to ethics and professional practice issues.

The approval programs of both these organizations fail the cost/benefit test.

4. What kind of regulatory process – if any – is needed for continuing education; and which organizational entity is best suited to perform this function?

The use of a single standardized national program for the approval of continuing education is the norm in most regulated professions. Also found in most professions are consistent standards in education, accreditation, clinical practice, licensure and certification. By contrast, massage therapy is literally all over the map in these regards. Where we'd like our field to be – and its actual status – are miles apart. This gap is part of a long-standing problem, and it generates the tendency to view regulation as being able to fix what is missing at the foundational level. From my experience, it has not worked that way. Top-down solutions have not remedied the structural deficiencies in our field; they can only be solved from the ground up.

Most CE approval processes are handled by the federation of licensing boards within a profession. This makes sense because state boards are authorized to enforce regulations. There are also limited examples of CE approval programs in some professions based in a national certification board, an accrediting commission and a professional membership association.

At present, the dominant player in CE approvals for the massage therapy field is the National Certification Board for Therapeutic Massage & Bodywork. As noted in the Overview, 25 of the 33 state massage boards that require CE for license renewal utilize NCB's program in whole or part. This kind of relationship is problematic because the state agencies have absolutely no control over how NCB's program is designed or administered. This constitutes what is termed *Improper Delegation of Authority*. It is a important legal and ethical issue, because state agencies that are established by a legislative act may not delegate mandated regulatory functions to outside entities without secure mechanisms of supervision and control in place. (While on this subject, it should be noted that the same problem also applies to state boards' continued use of NCB's certification exams for licensure purposes.)

There are two ways this delegation of authority requirement could be met: Either FSMTB would own and operate a national CE approval program for its Member Boards (leaving NCB out in the cold), or NCB would contract with FSMTB to be its outsourced CE approval agency. The latter option would require NCB to give the Federation shared supervision and control over the program's management. Given the enmity between the two organizations, neither option appears to be possible at this juncture.

Looking back, NCB got into the CE approval "business" in the early 1990's to strengthen its voluntary certification program when it sought accreditation from the National Commission for Certifying Agencies. NCCA's *Standards of Accreditation* for certification programs only mandate that they require practitioners to periodically recertify – and that recertification requirements "measure or enhance the continued competence of certificants".¹⁷ NCCA's accreditation standards do not require NCB to administer a CE approval program.

NCB's original mission statement was: *To foster high standards of ethical and professional practice in the delivery of services through a recognized credible credentialing program that assures the competency of practitioners of therapeutic massage and bodywork.* That was appropriate, as competency assurance is what certification boards are established to do. However, NCB made a dramatic change to its mission statement in 2009, dumping the competency assurance language and shifting its focus: *To define and advance the highest standards in the massage therapy and bodywork profession.*

This broad and lofty statement represents a departure from the traditional scope of a certification board. In response to the loss of stature from the introduction of the MBLEx, it appears that NCB decided to reposition itself in an attempt to exert more influence over the massage therapy field. This is objectionable because no single player in the matrix of stakeholder organizations has the authority to be the creator or arbiter of standards that affect the whole. It was a power grab, and NCB's current operating philosophy has caused it to overreach on a number of initiatives – including its new CE approval program.

If neither FSMTB nor NCB are willing to work together to establish a unified CE approval program – and if formal regulation of continuing education itself is fundamentally unable to assure the quality of courses that are offered – then where does this leave us? In pondering the situation, I was reminded of a well-known Gershwin tune from a classic film with Fred Astaire and Ginger Rogers. You'll recognize its refrain, which ends with the song title:

*You say eether and I say eyether... You say neether and I say nyther;
Eether, eyether, neether, nyther... Let's call the whole thing off!*¹⁸

It's time to do just that, because the high-stakes regulatory approach has not delivered as promised. Adding a new national CE approval program from FSMTB alongside increased requirements from NCB's approval program will make an already bad situation much worse. Fortunately, we are not limited to the two choices at hand; turn the page to see my proposal for a novel and more appropriate solution.

The National Continuing Education Registry

Introduction

The **National Continuing Education Registry** (abbreviated as "NCER" or "Registry") will be an online listing service of verified continuing education providers and courses in the field of massage therapy, bodywork and somatic therapies in the United States.

- Continuing education (CE) providers will be screened by a designated entity to determine that: 1) the provider is a legitimate business entity, and 2) where required, the provider has a valid state-issued massage therapy license, registration or certification. Providers will sign a participation agreement that includes adherence to a code of ethics.
- Each CE course will be screened to determine that it is within established subject matter standards that are broadly relevant to the professional practice of massage therapy.
- The NCER may be utilized by state massage regulatory agencies as the means to determine whether a CE course is acceptable for renewal of a licensee's credentials to practice. In a similar way, NCBTMB (or other certification agencies in the future) could utilize this service to determine whether a course taken by a certificant meets the criteria for recertification.
- This service will give massage therapists a basic level of assurance that listed courses will be accepted for license renewal and/or recertification, and that the course is offered by a credible individual or institutional provider.

Benefits

The NCER will provide a practical and affordable alternative to the CE approval programs currently in operation by NCB and a number of state massage boards, as well as the forthcoming program from FSMTB. It is better matched to the actual status of CE in the massage therapy field, and makes no undeliverable promises. With less documentation for providers to submit, and less work for the reviewing entity, the Registry will consume far less in the way of resources on both sides of the equation, as compared to a high-stakes regulatory program. As such, it will prevent CE costs from being driven up by excessive regulations.

This approach will support maintaining CE as a mandatory element in license renewal and recertification, while giving providers more time and flexibility to focus on the improvement of their own teaching skills and course offerings. It also has the potential to consolidate all existing and projected CE regulatory programs into a single system, thus eliminating inconsistencies and redundancies. Therapists will benefit from increased portability, and having a broader range of courses available to them that can be applied to the ongoing renewal of their credentials.

Some Details

This proposal is a first outline of an entirely new concept for our field. A full strategic plan will need to be created before the program can be implemented. One of the key aspects to decide will be where the Registry will be housed. This function could potentially be managed by one of our existing stakeholder organizations, or it may be handled by an entity outside our field. There are logistical and economic considerations that will go into making this determination, which will include an assessment of administrative capability and record of customer service. Listing fees for providers and renewal periods are details that will be addressed once the program takes shape. Simplicity, clarity and ease of use for both providers and therapists will be essential.

A set of **Continuing Education Subject Matter Standards** forms the centerpiece of this plan (see **Appendix C** on page 24). This template is derived from guidelines I authored in 2000 for the North Carolina Board of Massage & Bodywork Therapy. The NC Board successfully used these standards over a four-year period as the criteria for what constituted an approved CE course for license renewal, so it is a proven system.

More recently, I encouraged the leaders of NCB to adopt these standards to give increased definition to their provider approval program. The organization included a modified version in its *Reference Guide for Approved Providers*.¹⁹ In preparing this proposal, I went back and reviewed the original NC Board subject matter standards along with the version that NCB has been using. I updated the lists of both *Acceptable Subject Matter* and *Unacceptable Subject Matter* to reflect the current state of practice in the field.

The descriptions in the subject matter list are purposely framed in general and more inclusive terms. This is necessary because: 1) there is a lack of consistency in the scope of practice definitions found in state massage laws, and 2) there are hundreds of named modalities and proprietary treatment methods being promoted these days.

The overall structure of the NCER is similar in ways to the Multiple Listing Service concept in real estate. It will be based on a voluntary participation of CE providers, who agree to conduct their business according to a code of ethics. Like shopping for a house, therapists will have to perform their due diligence to find the courses and providers that meet their learning needs. There are no guarantees, but a provider's reputation for integrity will be a great asset.

Action Plan

A two-stage process will be needed to adopt the National Continuing Education Registry as the single source for CE management. The *first stage* will focus on the Boards of Directors of FSMTB and NCB. These leaders will have to vote to set aside the respective CE approval plans they have already adopted. The Federation's board has seven members; NCB's has nine. Including the chief staff officers of each organization, we're needing to influence a total of just 18 people to change the course of history here – not the 535 members of Congress or your state legislature. Needless to say, this task will not be easy. Both these non-profit organizations are

forging ahead with their plans and have shown little inclination to back off. At the same time, we should remember that both of these non-profits answer to their constituents.

For FSMTB, its constituents are the state massage boards. It will be important to contact your own state board and encourage its members to let FSMTB know that they support the Registry Plan. In addition, the leadership of FSMTB should be contacted directly. If you live or teach in the one of the states that run their own CE approval program (IA, IL, LA, MS, TX), the benefits of reduced administrative responsibilities for that state agency should be emphasized. NCB's constituents are its 80,000 certificants, along with all the CE providers who are under its current approval plan. Communication in support of the Registry Plan should go directly to the leadership of that organization. Here is the contact information:

>> **Federation of State Massage Therapy Boards:**

Debra Persinger, PhD, Executive Director | dpersinger@fsmtb.org

Jaime Huffman, MPH, LMBT, President | jhuffman@fsmtb.org

>> **National Certification Board for Therapeutic Massage & Bodywork**

Mike Williams, CEO | mwilliams@ncbtmb.org

Susan Toscano, LMT, Board Chair | peteytoscano@gmail.com

The *second stage* of this process will involve working with each state massage board to change the existing regulations that specify CE for license renewal. This is a technical exercise that is different in each state, and it is likely to take a period of years to get it accomplished. AMTA and ABMP will need to get involved, as they have the resources to conduct government relations efforts. Most importantly, FSMTB will need to lead the way with its Member Boards, and take an active role in support of this transition.

FSMTB is in a secure position right now, with a large cash reserve resulting from the success of the MBLEx. However, the organization cannot afford to create ill will with an unwanted CE program that is rejected by the community of providers. NCB is in a far more vulnerable position, strapped for revenue and coming off of a series of failed initiatives. For NCB to survive, it needs its new Board Certification credential to succeed. The support of massage schools and CE providers will be essential in making this happen. However, it will not be forthcoming if NCB refuses to stand down on its new Board Approved CE Provider program. (I've already heard some rumblings of a "Boycott NCB" campaign if the tune doesn't change.) NCB must earn back the trust of the rest of the massage therapy field, and its decisions in the near term will show whether this is a real priority.

Conclusion

We are at a critical juncture where change can and must be made for the long-term health and advancement of the massage therapy field. Ineffective or needlessly burdensome regulation is worse than none at all. We have to get beyond the silo mentality of the organizations in question to be able to forge common solutions for the greater good. The plan described here for

a National Continuing Education Registry presents the best alternative to a regulatory model that is causing more problems than it solves for both therapists and providers.

Authenticity matters. It's time that we stand tall for what we are, and dispel false or wishful notions about the massage therapy field. We'll go a lot further, and gain more respect that way.

About the Author

Rick Rosen is a North Carolina Licensed Massage and Bodywork Therapist who has 35 years of experience in the field. He is founder and co-director of the Body Therapy Institute, a COMTA-accredited massage school in Siler City, North Carolina. He has a masters degree in psychology from West Georgia College, is a graduate of the Florida School of Massage, and earned certifications in structural integration and body-centered psychotherapy. Rick developed and teaches *The Way of Ease*®, a system for optimizing practitioner performance and improving therapeutic outcomes. Through his work with BTI and other organizations, he has promoted hundreds of continuing education workshops for other CE providers.

He was the founding chairman of the North Carolina Board of Massage & Bodywork Therapy, and served as a co-founder and first executive director of both the Federation of State Massage Therapy Boards (2005-06) and the Alliance for Massage Therapy Education (2009-12). Rick is a member of ABMP, a charter member and past president of the AMTA North Carolina Chapter, and a 2010 inductee into the Massage Therapy Hall of Fame. He is also a contributing author to *Teaching Massage: Fundamental Principles in Adult Education for Massage Program Instructors* (Lippincott, Williams & Wilkins, 2008), and serves as an educational consultant to the Program on Integrative Medicine, University of North Carolina School of Medicine.

Notes

1. Rick Rosen. *On Becoming a Profession: The Challenges and Choices that will Determine Our Future*. Published online, April 2008; may be accessed from:
http://www.massage.net/articles/pdfs/Rosen_On-Becoming-a-Profession.pdf
2. <http://www.ncbtmb.org/news/new-and-evolved-board-approved-continuing-education-provider-program-beginning>
3. Rosen, *op.cit.*, pp. 6-9
4. <http://www.ncbtmb.org/certificants/board-certification>
5. <http://www.ncbtmb.org/continuing-education-providers/board-approved-continuing-education-provider-program>
6. http://www.fsmtb.org/downloads/MOCC_Guide.pdf
7. AMTA's response to the MOCC proposal was released on April 23, 2012:
<http://www.amtamassage.org/articles/1/News/detail/2565>

8. https://fsmtb.org/Standardized_License_Renewal_Recommendation_Final.pdf
9. <http://lauraallenmt.com/blog/2013/01/08/caught-between-hubris-and-the-grudge>
10. You can listen to Molten Lava Death Massage playing *Axe of the Occult* at:
<http://www.myspace.com/music/player?sid=26153897>
11. The Vermont Office of Professional Regulation published its report December, 30, 2010 on *Assessment for Request for Licensure*. The full five-page opinion may be accessed from:
<http://www.vtprofessionals.org/downloads/sunrise/massagetherapistsunriserpt%202010%201230.pdf>
12. Diana Thompson, past president of the Massage Therapy Foundation, authored an article on *The Lactic Acid Debate* in the March/April 2011 issue of *Massage & Bodywork*. This article may also be accessed online at:
http://www.massagetherapy.com/articles/index.php/article_id/2040/The-Lactic-Acid-Debate
13. <http://www.massagetoday.com/mpacms/mt/article.php?id=14631>.
14. Rosen, *op.cit.*, pp. 4-6
15. This a short link to the AFMTE *Core Competencies* document: <http://goo.gl/LT4w6>
16. <http://www.massagetoday.com/mpacms/mt/article.php?id=14669>
17. Standard 20 of the NCCA *Standards of Accreditation* states: "The certification program must demonstrate that its recertification requirements measure or enhance the continued competence of certificants." It does not dictate the means by which this outcome is achieved. This document may be accessed from:
[http://knappinternational.com/assets/uploads/pages/NCCA%20standards\(1\).pdf](http://knappinternational.com/assets/uploads/pages/NCCA%20standards(1).pdf)
18. For you film buffs, the song was from the 1937 musical *Shall We Dance*. The lyrics may be accessed from: <http://www.lyricsdepot.com/fred-astaire/lets-call-the-whole-thing-off.html>
19. The NCB *Approved Provider Reference Guide* is archived at:
http://www.ncbtmb.org/system/files_force/library/AP_ReferenceGuide.pdf

Appendix A

Concerns about the Board Approved Continuing Education Provider Program from the National Certification Board for Therapeutic Massage & Bodywork

Background

In 2009, NCB began developing and promoting a new credential called "National Certification for Advanced Practice". This program was withdrawn in March 2012 because of lack of support from stakeholders, and because there was no reliable basis for calling a practitioner "advanced" in a field that still has such inconsistent entry-level standards. At the same time NCB announced the withdrawal of its NCAP program, it introduced the new "Board Certification" credential, which is based on a 750-hour educational requirement and a new post-graduate certification exam. This is intended to replace the entry-level National Certification credential as that long-standing program is phased out over the next four years.

In May 2011, NCB convened a multi-stakeholder group meeting to discuss the issue of continuing education standards and approvals. The input from this session was used in the development of what NCB is calling its "upgraded" standards for the approval of continuing education. A new CE approval program was introduced in November 2012 as a component of NCB's new post-graduate certification program.

Specific Concerns

NOTE: The ten concerns listed below are based on the new Board Approved CE Provider Program as described on the NCB website and press releases. As of the publication date of this paper (February 10, 2013), it appears that NCB may be reconsidering certain aspects of this program and delaying its implementation.

Donna Sarvello, who manages the Approved Provider and School Outreach Programs for NCB, made a brief comment on February 6 on Laura Allen's Facebook page that NCB would be "keeping the organization status". I wrote to Ms. Sarvello for clarification, because there was also conflicting information on the NCB website regarding the implementation of the new requirements for providers. She informed me that "Providers don't need to renew until their renewal date because while we are reviewing the new program we have reinstated the past program. I can't give you the exact details on the organization status at this time because we are tweaking the details and then will put it out for public comment." Other than this brief update, there has been no other official communication from NCB regarding this issue.

In the midst of this confusing (and rapidly changing) situation, here are the concerns about NCB's program as published:

- 1) This new program, which went into effect January 1, 2013, represents a radical shift to the way CE approvals are handled in the United States. It adds a mandatory layer of course approvals to the existing provider approvals, and removes the category of "organizations" from the approval program altogether. That means only individual CE instructors may be approved – and massage schools, CE businesses, training organizations and membership organizations will be excluded. These institutional entities represent a major part of the structure of how CE is programmed, promoted and delivered. Shifting the entire approval focus to individual instructors ignores the well-established role played by institutions. There are more than 1700 Approved CE Providers listed on the NCB website, and a significant percentage are in the Organizational category. In addition, there are thousands of different courses being offered by CE providers. There are long-standing business models that will be dramatically impacted by this regulatory change.
- 2) This program was put out in final form on November 12, 2012 by NCB *without a call for comment from the affected stakeholders*. It is unacceptable for a change of this magnitude to be implemented without giving these individual providers, organizations and state regulatory boards an opportunity to weigh in on the proposed program. A one-time focus group session is not a replacement for a full national comment period. This failure alone is a reason to withdraw the new program.
- 3) Under the new program, NCB is requiring all current approved providers (at least those that still qualify under the new guidelines) to resubmit documentation on all instructors and all courses to be reviewed by December 31, 2013. Given the sheer number of providers and courses, and the limited resources that NCB will be able to devote to this program, it is a prescription for gridlock.
- 4) The other stumbling block with review of application documentation is the potential lack of qualifications of those who are performing this function. Volunteer certificants who are massage therapists or teachers may or may not be qualified to evaluate the subject matter of the courses being reviewed, or to evaluate the competency of CE instructors. It is unlikely that they would have the technical knowledge and experience in instructional design to properly evaluate the application materials to determine whether the course was well crafted and could deliver on its stated learning objectives. The same concerns apply to administrative staff members in the NCB office who are not experts in instructional design. Has NCB budgeted to hire a permanent staff with the requisite skill set to carry out this work in an effective and timely manner? With NCB having the power to approve or deny all course approvals, CE providers will be putting their careers on the line with a questionable review protocol.
- 5) The new program adds the requirement of a "background check" for all CE instructors – not only at the time of initial application for approval, but also at the time of each renewal. This presupposes that there is some danger or threat from the criminal element being involved in the business of continuing education. As there is no such problem in our field,

this requirement represents an invasion of privacy, and is an insult to the many teachers and business owners who conduct themselves with honesty and integrity.

- 6) The new program requires instructors to run a "pilot study" for all courses to be approved. For providers who have been offering courses for some period of time, this is a useless exercise. For new course offerings, it is impractical for a provider to assemble a group of therapists to attend a no-credit no-fee "pilot" workshop. This just doesn't happen in the real world.
- 7) On the new instructor requirement for liability insurance to be carried: the coverage that comes with the bundled professional liability policies sold by ABMP, AMTA, Massage Magazine and others is expressly for the practice of massage therapy – not the teaching of CE workshops. It could be prohibitively expensive for CE providers who travel around the country to obtain a policy that would cover their educational activities wherever they teach. Again, the question must be asked if students at CE workshops are being harmed. What does the data show on this? Absent a clear indication that there is a problem, this requirement is unjustified.
- 8) From the perspective of state massage boards, the new program offers no demonstrable improvement to public protection. As well, the expansion of the program into course approvals gives NCB even more power and control over how continuing education is created and delivered. This exacerbates the problem of *Improper Delegation of Authority* (described on page 13).
- 9) NCB states on its website that "while most courses and instructors deliver on the expected value, others have not hit the mark". With this being the case, it is unnecessary to make such a radical change to the entire CE approval system just to improve a minority of courses. It is a mistake to penalize the 90% of those who are doing an acceptable job for the 10% who are lagging behind the curve.
- 10) The new program significantly increases the administrative and financial burdens on the CE community at a time when both individual and institutional providers – as well as massage therapists – are challenged by a troubled economy. The added costs of compliance may cause some providers to reduce the number of course offerings, and it may drive some out of the CE business altogether. In either of these cases, therapists will have fewer choices as they search for CE. This scenario would be a loss across the board.

Appendix B

Continuing Education Requirements by State

(Note: This information changes periodically, so check current state regs for verification)

STATE	CE HOURS FOR RENEWAL	TERM OF LICENSE (YEARS)	HRS REQ PER YEAR	APPROVAL MECHANISM
AL	16	2	8	NCBTMB
AZ	25	2	12.5	NCB, state, plus numerous org/institutional categories
AR	18	2	9	NCBTMB + state + other state board approvals
CT	24	4	6	NCBTMB
DE (LMT)	24	2	12	NCBTMB
DE (CMT)	12	2	6	
DC	12	2	6	NCBTMB
FL	24	2	12	NCBTMB + state
GA	24	2	12	NCBTMB
IL	24	2	12	state approval process
IA	24	2	12	state approval process
KY	24	2	12	NCB, state, plus numerous org/institutional categories
LA	12	1	12	state approval process
MD	24	2	12	NCB, or courses by schools of higher education
MS	24	2	12	state approval process
MO	12	2	6	no CE approval required for providers or courses
MT*	12	2	6	NCBTMB
NE	24	2	12	NCBTMB
NV	12	1	12	NCB, state, plus other org/institutional categories
NJ**	20	2	10	NCBTMB
NH	12	1	12	NCB, or courses by schools of higher education
NM	16	2	8	no CE approval required for providers or courses
NY	36	3	12	state (+NCB as a NY-approved CE sponsor)
NC	25	2	12.5	NCB, or courses by schools of higher education
ND	32	2	16	NCBTMB
OR	25	2	12.5	no CE approval required for providers or courses
PA*	24	2	12	NCB, state, plus numerous org/institutional categories
SC	12	2	6	NCBTMB
SD	8	2	4	NCB, state, plus other org/institutional categories
TN	25	2	12.5	NCB, state, plus numerous org/institutional categories
TX	12	2	6	state approval process
VA	25	2	12.5	NCBTMB
WA	24	2	12	no CE approval required for providers or courses
WV	24	2	12	NCBTMB

10.34 Average CE hours per year required

* Proposed requirement

** Under current state certification, not yet under forthcoming state licensure structure

State Currently Determining CE Requirements: CA; MA; MI; PR; WI

States Currently Not Requiring CE: CO; HI; IN; ME; OH; RI; UT

Appendix C

Continuing Education Subject Matter Standards

These standards apply to courses offered by a provider listed on the National Continuing Education Registry that have subject matter and learning objectives that relate directly to the scope of practice of massage therapy. Note that "massage therapy" shall be broadly construed to include touch therapy practices under the descriptors of "bodywork" or "somatic therapy" where applicable to state law.

Acceptable areas of subject matter for continuing education courses may include:

1. Applications of massage therapy for specific needs, conditions or client populations
2. Theory, philosophy or methodology of manual, energetic or movement-based techniques which are utilized with clients for therapeutic, educational or relaxation purposes
3. The structure, function, kinesiology or pathologies of the body
4. Client assessment protocols; skills for client record keeping and case management; strategies for interfacing with other licensed health care providers
5. Theory or practice of ergonomics as applied to therapists or clients
6. The use of external adjunctive agents such as water, light, sound, heat, cold or topical applications of plant or mineral-based substances
7. The use of mechanical devices or adjunctive tools that mimic the actions made possible by the hands
8. Body-centered or somatic psychology, psychophysiology, interpersonal skills – which may include communication skills, boundary functions, and the phenomena of transference, countertransference and projection
9. Standards of practice; professional ethics; compliance with state laws and administrative rules that relate to the practice of massage therapy in the therapist's jurisdiction; compliance with federal regulations such as HIPAA and ADA
10. Strategies for the marketing or development of massage and bodywork therapy practices; procedures for third-party reimbursement
11. Hygiene; standard precautions and methods of infectious disease control; organization and management of the treatment environment
12. Development or analysis of research protocols for massage therapy
13. First Aid or Cardiopulmonary Resuscitation
14. Teacher training, which may include areas of knowledge, skills or attitudes set forth in the *Core Competencies for Massage Therapy Teachers*, published by the Alliance for Massage Therapy Education

The following areas of subject matter are considered unacceptable for continuing education courses:

1. Practices outside the scope of massage therapy which are prohibited pursuant to state law and that require a separate health care license, including: medical diagnostic procedures, prescription of drugs, high velocity/low thrust chiropractic or osteopathic manipulation, acupuncture, electrical stimulation, ultrasound
(Arkansas and Florida are exceptions, where LMT's are permitted to utilize electrical modalities)
2. Psychological counseling or diagnostic methods, emotional release-based cathartic therapies, or regression-oriented therapies
3. Courses taken by therapists for personal enrichment or self-care, including dance, yoga, Pilates, t'ai chi, martial arts, strength training or fitness classes, meditation, astrology, religious or spiritual practices
4. Business management skills, including bookkeeping, accounting, tax preparation, use of computer hardware or software, technical writing or graphic design
5. Participation in supervision groups, whether facilitated by a peer or mentor
6. Apprenticeship with another massage therapist or another licensed health care provider
7. Teaching experiences where the therapist is either a presenter or a teaching assistant
8. Volunteer service work, or participation in professional membership organizations
9. Provision of massage therapy services as part of a research study
10. Therapeutic sessions where the massage therapist is in the role of client receiving the professional service