

Dear Chairman Olsen and Members of the Committee

My name is Victoria Dance, a massage therapist licensed in Arizona since 1984, when I also became a member of the AMTA. Before coming to Alaska, I was the Director of Continuing Education for the Desert Institute of the Healing Arts in Tucson. I have been working as a massage therapist at a medical clinic here in Juneau for the last 5 years. I have a Masters in Higher Education Administration so I would like to speak to the educational qualification issues in this bill.

**HOURS: Sec. 8.61.030, Qualifications for license, article (3), lines 26-28, p.3**

The therapists who have written to you and testified before you, both for and against, are some of the most qualified massage therapists in Alaska.

Unfortunately, not all therapists are as experienced and qualified as they are. I don't believe that 500 hours of training puts entry-level therapists on the same level of competence as the therapists you have heard from, who all have quite a bit more than 500 hours of training to do the massage they want to be rightly paid for.

If the public is going to rely on state licensure for protection in regards to competent massage therapists, then it might be helpful to look for guidance on training hours from independent organizations such as the Commission on Massage Therapy Accreditation. COMTA has a set of competencies for their accredited schools and requires 600 clock hours of training.

COMTA meets the criteria identified by the Secretary of Education for all accrediting organizations, but COMTA specializes in accrediting massage schools. If HB328 required 600-hours instead of only 500, Alaska schools would be accountable to COMTA and the state would be providing another level of protection.

Another indication that it might be appropriate to increase the number of hours in this bill is the recent recommendation from ELAP. The Entry-Level Analysis Project has been researching competency for massage therapists for the last two years. ELAP's goals were to define knowledge and skill components of entry-level massage education and recommend the minimum number of hours schools should teach to prepare graduates for safe and competent practice in the massage profession. Last month ELAP released a recommendation for a minimum number of 625 clock hours for entry-level training to establish basic competency.

Another support for higher hours is the AMTE recommendation. Pete Whitridge, President of the Alliance for Massage Therapy Education, noted, "there is a tremendous divergence between 500 hours and 625 or 700 hours. Starting a law at 500 hours does the state a great disservice in terms of current suggested practice acts based on 625 hours. Especially with the growing field of medical massage, people at the beginning of their career must have some kind of additional training in the context of medicine and insurance billing".

Additionally, Gregory Lawton, President, American Manual Medicine Association (AMMA), says, "A clinical, orthopedic or medical massage therapist should have more than 500 hours because they are being asked to treat specific musculo-skeletal conditions". A 500-hour school is training students to do Swedish relaxation massage and introducing them to a pot pourri of other types of massage. In a school that is teaching all kinds of massage", says Mr. Lawton, "500 hours would not be enough. AMMA requires 600 clock hours of training for a medical massage therapist.

**SCHOOLS: Sec. 08.61.100 Definitions (1), lines 16-20, p.8**

Some argue that a new law should be passed with a low 500-hour education requirement because that allows transition time for schools. I would respond to that by pointing out that there would be transition time to develop a 600-hour program. The best scenario for developing curriculum is to have 12-18 months—just about what the schools up north would have if they started at the end of this session.

For instance, to develop a 36-hour training program it takes about 4 months to plan and put together lesson plans, TA protocols and training aids. For these reasons, I believe that Alaska schools have enough time to provide the curriculum for a 600-hour statute.

The Department of Education allows application for partial financial aid if the student is in a 600-hour program. I would like to emphasize that asking schools to increase their clock hours to meet Title IV financial aid regulations does a great service to anyone in Alaska who would like to be part of a career that has a 23% growth rate. Many students need financial aid to go to school and by raising the hours in the bill, you would make it easier for them to achieve their goals.

**Sec. 08.61.100 Definitions (1.B), line 20, p.8**

**I am proposing that the language of the bill be amended to read: is accredited by a nationally recognized *specialized* accrediting agency.**

**EXAM: Sec. 08.61.020 Duties and powers of board, article (9), line 22, p.3**

I would like to propose that the language should read "two or more exams" to ensure that people who have already taken the NCBTMB are included and the most appropriate exam is not excluded.

NCBTMB was the first massage therapy exam, developed as a marketing product for their voluntary certification program. It is tied to their own qualification requirements and not designed with public protection as the primary focus. Initially they sold just the one NCBTMB exam, when states found that inappropriate for licensing, they marketed NESL exam. Then that was discontinued and now there's a NCETM exam as well as the NCBTMB exam tied to their registration requirements. Their products often change and states that rely on them have no influence in their content, delivery or timeliness.

The MBLEx exam was designed by the Federation of State Massage Therapy Boards (FSMTB) specifically to meet the needs of the licensing boards and agencies that had unanimously indicated that they needed a licensing examination that was state owned and

operated. So the FSMTB developed the MBLEx specifically to give the regulatory community oversight over exam content, organizational policies and procedures pertaining to the exam. For instance, the MBLEx has a quarter of its content dedicated to ethics, boundary issues, professional conduct and contraindications.

If there are two options in the law for exams, the state would give better protect the public and accommodate those who have already passed an exam.

**Sec. 08.61.020 Duties and powers of board, article (8), line 29-21, p.3**  
**I am proposing that the language should read "two or more exams"**

Thank you for your attention,  
Victoria Dance, MA LMT  
2695 David St. #1  
Juneau, AK 99801  
907-957-4080  
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