

Hello, this is Devron Hellings, I am an Alaska Native super voter residing in House District 24, Precinct 730. I am compelled to reach out to:

Representative Chris Birch (465-4931)
Representative Andy Josephson (465-4949)
and
Labor Committee Chair Sam Kito (465-4766)

to voice my **opposition to House Bill 110**, an effort to repeal statutory exemption for Certified Rolfers (and people that touch hands, feet, and ears which is what acupuncturists and reflexologist do) from having to be affiliated with the Massage Board or industry.

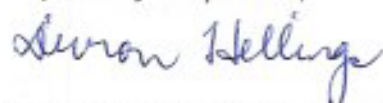
I am and have been a Rolfig client for about 30 years; I am also a regular Acupuncture patient; in addition, I receive therapeutic massage from a licensed therapeutic massage therapist. I am well aware of the different levels of education, training (initial and ongoing), and peer review Certified Rolfers, Certified Advanced Rolfers and Movement Experts and Acupuncture doctors must complete. These professionals obtain diplomas or other certification, adhere to industry standards and protocols set by national professional bodies. These professionals do not belong under Massage Board jurisdiction.

Without intending to be critical of massage therapists, their training lacks the sophistication and financial commitment that candidates and successful practitioners of Rolfig and Acupuncture. Rolfers and Acupuncture or Eastern Medicine practitioners do not move their practices on a whim, they do not pull up stakes to relocate to another salon, athletic club, or similar establishment where business may be better. Since Rolfers and Acupuncturists are professional business people, they critically evaluate location and work to establish successful practices for the longterm.

I understand the the concern over human trafficking in Alaska. I have been in the audience several times when a member of the Human Trafficking Task Force Special Federal Bureau of Investigations Agents addressed the Association of Village Council Presidents Annual Convention and the Alaska Federation of Natives Annual Convention. Young Native men and women are often targeted. House Bill 110 is a misguided effort to paint Rolfig professionals, people who touch hands, feet and ears (doctors of Acupuncture and Eastern Medicine and Reflexologists) under the same brush as massage therapists. These are distinctly different professions. House Bill 110 is frankly **bureaucratic over-reach** and seeks to **unnecessarily regulate** the Rolfig (and Acupuncture and Reflexology) industry. For many, "getting a massage" is euphemistic for the sex industry. It is a travesty to include Rolfers (and Acupuncturists and Reflexologists) under the Massage Board or industry.

I stand in strong opposition to House Bill 110 and ask Representatives Chris Birch and Andy Josephson and Labor Committee Chair Sam Kito to protect the exemption of Rolfers (and those that work with hands, feet and ears). **Vote "NO" on House Bill 110.**

Respectfully Requested,



Devron Hellings, 2920 Hogan Bay Circle, Anchorage, AK 99515 907-317-3336



February 14, 2017

Chair, Rep. Sam Kito
Representative.Sam.Kito@akleg.gov

Vice Chair, Rep. Adam Wool
Representative.Adam.Wool@akleg.gov

Rep. Andy Josephson
Representative.Andy.Josephson@akleg.gov

Representative Louise Stutes
House Majority Whip
Representative.Louise.Stutes@akleg.gov

Representative Chris Birch
Representative.Chris.Birch@akleg.gov

Representative Gary Knopp
Representative.Gary.Knopp@akleg.gov

Representative Colleen Sullivan-Leonard
Representative.Colleen.Sullivan-Leonard@akleg.gov

Re: HB110

Dear Chair Kito, Vice Chair Wool, and Representatives Josephson, Stutes, Birch, Knopp, and Sullivan-Leonard:

We are writing on behalf of the International Association of Structural Integrators® (IASI) and in support of the local Alaskan Structural Integration community to request that HB 110 be amended to preserve the exception language currently in statute at AS 08.61.080(10).

Before moving to why eliminating the exception for Structural Integration (SI) currently encoded as Section 08.61.080 (10) and replacing it with the language of HB110 would harm our profession and work against the purposes of public safety, we would like to introduce our profession and our organization to help you understand our position.

Structural Integration is a manual therapy profession based on the work of Dr. Ida P. Rolf which works the connective tissue of the body to integrate and align the body. Unlike in massage, our clients are not fully disrobed for our sessions. In addition to manual therapy, we utilize movement, verbal cues, and awareness education to improve mobility and reinforce proper alignment and function.

Structural Integration theory, focus, and practice does not use nor require knowledge of or use of massage techniques, theory, training, or education. We have our own schools, curricula, continuing education, certification board, and psychometrically valid certification exam.

There are currently seventeen (17) IASI approved schools of Structural Integration worldwide. All of our schools that provide a foundation program require between 730 and 2,100 hours of education for graduation. Twelve (12) of these schools are in the United States. <http://www.theiasi.net/iasi-recognized-si-training-programs>.

The Certification Board for Structural Integration (CBSI) is an independent division of IASI offering the only psychometrically valid exam for graduates of IASI approved education programs. The exam is called the Certification Exam for Structural Integration (CESI). Once a practitioner becomes Board Certified, he or she must maintain certification by taking 72 hours of IASI approved continuing education in Structural Integration every 4 years. <http://www.theiasi.net/about-cbsi>

IASI is the umbrella organization that includes Structural Integrators from every school of Structural Integration (SI). We have a Board made up of professionals representing a variety of SI modalities and have Bylaws, a Code of Ethics, a Scope of Practice for Structural Integration, and a Position Statement for the Appropriate Regulation of Structural Integration. We also offer professional insurance for our members and approved CE courses applicable to our profession. (www.theiasi.net) (See: Appendices for attachments of Bylaws, et al.)

In addition to the IASI approved schools enforcing professional standards on their graduates, through revocation of certification and other means, IASI has the capacity to revoke membership and board certification should the need ever arise.

The current statutory exception language regarding SI reads as follows:

Sec. 08.61.080. Exceptions to application of chapter. This chapter does not apply to a... (10) person engaged only in the practice of structural integration for restoring postural balance and functional ease by integrating the body in gravity using a system of fascial manipulation and awareness who has graduated from a program or is a current member of an organization recognized by the International Association of Structural Integrators, including the Rolf Institute of Structural Integration;

HB 110 changes the current exception language:

*Sec. 3. AS 08.61 is amended by adding a new section to read:

Sec. 08.61.085. Application for an exemption.

(a) The board *may* issue an exemption from the licensure requirements of this chapter to a person who

(1) submits an application on a form approved by the board;

- (2) pays the fees established under AS 08.61.090; and
- (3) submits proof satisfactory to the board that the person
- (B) is engaged only in the practice of structural integration and holds a current certified professional membership from the International Association of Structural Integrators or is certified by the Rolf Institute of Structural Integration;
- (b) The board shall
 - (1) *notify an applicant in writing of a decision to approve or deny an exemption under this section;*
 - (2) *maintain a registry of persons exempted under this section; and*
 - (3) *establish by regulation standards and requirements for persons applying for an exemption under this section.*
- (c) *An exemption issued by the board under this section is valid until the earlier of*
 - (1) *10 years after the date the exemption is issued; or*
 - (2) *the date on which the person's scope of practice changes.*
- (d) The board may renew a valid exemption issued under this section if the person submits a timely application on a form approved by the board and pays the established fees under AS 08.61.090.

The first point of issue is that the statute uses the language “the board *may* issue an exemption”. This language offers no guaranteed protection to any of the currently excepted professions that they will not be regulated by massage therapists as if they were massage therapy instead of the independent and different professions that they are. The word “may” here allows for too much discretion. Further, the language of Sec. 3 allows the board to make a decision on a person by person basis with no direction to treat entire professions as the distinct bodies of knowledge and practice that they are. The broadness of this language opens it up to potential abuse.

The amendment also states an expiration date on exempt status of 10 years. This addition is arbitrary and serves no legitimate purpose. If a practitioner is still practicing a profession that is not massage in ten years, why should s/he have to reapply for exempt status? If it is not massage now; it won't be massage then.

The status of a profession as regulated or not is best kept in statute. If you eliminate the statutory exception for Structural Integration, we lose the clear safeguard from regulatory overreach that statutory protection provides our practitioners and profession. If the decision whether to exempt Structural Integration is left to a regulatory board, which is currently overseen by members of another profession, then our professionals could be inappropriately regulated based solely on the makeup of the board from one year to the next.

Should the board decide not to allow exemption for Structural Integration, it could vote to regulate us as if we were massage. This could require Structural Integrators to get a massage education on top of a Structural Integration education in order to practice the SI profession. This is the same as requiring a physical therapist to go to chiropractic school. It would require us to pay for two educations: Structural Integration school *and* massage school before we could practice our chosen profession. This would waste

time, be cost prohibitive, and serve no purpose. Structural Integration and massage are two distinct professions. As stated above, Structural Integration theory, focus, and practice does not use nor require knowledge of or use of massage techniques, theory, training, or education. In addition, Alaska's board could require Structural Integrators to take a massage licensing exam and massage continuing education, neither of which are relevant to our profession, but again waste the time and money, an undue hardship on small business owners in the state.

I would direct the Committee's attention to North Carolina Board of Dental Examiners vs. Federal Trade Commission, 134 S.Ct. 1491 (2014), as well as the plethora of cases involving African Hair Braiding. There is a point at which even the best intentions submit to unfair competition or unnecessary restriction.

Eliminating the statutory exception, as HB110 does, works against public safety. Only graduation from an IASI approved Structural Integration school and the passage of a relevant professional exam ensure the public that a Structural Integration practitioner has a basic level of competence.

Massage licensure and regulation is only appropriate for massage professionals. Other professions have different standards and scopes of practice to which their practitioners must hold. Exceptions, exemptions, and standards different from those applicable to massage are necessary so that professionals are not subject to unfair and inappropriate requirements, and so that the public may have access to safe and effective care through professions such as Structural Integration. These protections are only guaranteed when established in statute.

In recent years, several states have become aware of professions such as Structural Integration that are fundamentally different and distinct from the massage therapy profession. For this reason, ten (10) states specifically exempt Structural Integration from massage regulation, two (2) state boards have excluded Structural Integration from massage regulation, one (1) state regulates Structural Integration as its own profession with its own regulatory board, and one (1) state has presented legislation just this week to regulate Structural Integration as its own profession. These exemptions, exclusions, et al., have been developed with massage therapy professionals, regulatory boards and legislators, and have had strong public support. They all recognize Structural Integration as the distinct profession that it is.

IASI is a member of the Federation of Therapeutic Massage, Bodywork, and Somatic Practice Organizations (Federation MBS). Founded in 1991, the Federation MBS has taken a leadership role in developing solutions that meet the needs of all concerned parties, and IASI has been actively involved in these efforts since after IASI's founding in 2002. We support statutory exemption or exception for our fellow FederationMBS members who are also currently excepted under Alaskan law. A list of FederationMBS member organizations and our agreed upon legislative packet can be found at <http://www.federationmbs.org/>.

We request that the exception remain in Alaska's statute and not be moved to be dealt with under rules regulation. There is less clarity and transparency under rules regulations, and they are much more easily altered without notice to those who would be affected. We have experienced what happens when regulatory boards who do not understand our profession regulate us. It is akin to what happened this year in North Carolina Board of Dental Examiners vs. The Federal Trade Commission. <http://www.scotusblog.com/case-files/cases/north-carolina-board-of-dental-examiners-v-federal-trade-commission/>. Should Alaska's statutory exceptions be removed, we could be subject to massage specific rules, which have no relation to our profession and would create confusion for the public and hardship for non-massage practitioners. The Federation of State Massage Therapy Boards passed a Model Practice Act a couple of years ago, which destroys the distinction between the definition of massage and every other form of bodywork, encouraging their member boards to impose massage laws on non-massage professionals and to require those non-massage professionals to take the FSMTB's massage licensing exam, from which they made well over \$5 million last year. It is a vast professional overreach at the expense of public interest, safety, and professional integrity.

Thank you for considering our request to keep the exception language as is in AS 08.61.080 (to amend HB 16-1320 to preserve the current exemptions should that bill be otherwise accepted) and to keep these exceptions statutory. If the Committee elects to alter the language of the current exceptions to enhance protections for the public and professions, we recommend one of the two alternatives attached as Appendix 1 to this letter.

Please, let us know if we can assist you in any way. Our Law and Regulation Chair would be happy to speak with you.

Sincerely,
Patty Anderson
Executive Director, IASI
info@theiasi.net
1-855-253-IASI (4274)

Tom Robinson, Ph.D., Certified Rolfer™
President, IASI
iasitomr@gmail.com

Deborah Nimmons, JD, BCSI
IASI Board
Chair, IASI Law and Regulation Committee
iasideborah@gmail.com
(206) 910-1576

Robin Graber, BCSI, Certified Advanced Rolfer™
IASI Law and Regulation Committee
Member, Nevada State Board of Massage Therapists

Attached:

Appendix 1: Suggested Exemption Language

Appendix 2: IASI Scope of Practice for Structural Integration

Appendix 3: IASI Position Statement on appropriate regulation of Structural Integration

Appendix 4: IASI Code of Ethics

Appendix 5: List of States that exempt, exclude, or regulate SI as a separate profession

APPENDIX 1: Suggested exemption language

The following suggested exemption is from the Federation of Therapeutic Massage, Bodywork, and Somatic Practice Organizations legislative packet:

<http://www.federationmbs.org/LegPak-2016-07.pdf>

Suggested Structural Integration Exemption:

___.1. Nothing in this Article shall be construed to prevent, limit, or restrict the practice of any person who uses touch to effect change in the structure of the body while engaged in the practice of Structural Integration, provided that:

- a) the person's services are not designated as or implied to be massage or massage therapy;
- b) the person is recognized by or meets the established standards of a professional organization or credentialing body that acknowledges or certifies practitioners of Structural Integration based a minimum level of training, demonstration of competence, and adherence to established ethical standards; and
- c) the person provides contact information in the practitioner's place of business for any organization or agency that has certified the practitioner.

The following suggested exemption includes other exempt professions and enhances the Board's ability to verify that practitioners claiming to practice the exempt professions meet the qualifications they claim.

AS 08.61 does not apply to:

(__.1) Practitioners who:

- (A) Do not claim expressly or implicitly to be massage therapists;
- (B) Limit their work to one or more of the following practices:
 - (i) Using touch, words and directed movement to deepen awareness of existing patterns of movement and suggest new possibilities of movement;
 - (ii) Using minimal touch over specific points on the body to facilitate balance in the nervous system;
 - (iii) Using touch to affect the energy systems or channels of energy of the body; or
 - (iv) Using touch to effect change in the structure of the body while engaged in the practice of Structural Integration
- (C) Are certified by a professional organization or credentialing agency that:
 - (i) Requires a minimum level of training, demonstration of competence and adherence to an approved scope of practice and ethical standards; and
 - (ii) Maintains disciplinary procedures to ensure adherence to the requirements of the organization or agency; and
- (D) Provide contact information in the practitioner's place of business for any organization or agency that has certified the practitioner.

(__.2) The Board of Massage Therapists has the authority to verify that a practitioner claiming to be exempt from application of AS 08.61 under subsection (10) of this section is certified by a professional organization or credentialing agency as required by subsection (__.1)(C) of this section.

APPENDIX 2: IASI Scope of Practice of Structural Integration



DEFINITION OF STRUCTURAL INTEGRATION

A system to improve structural alignment and enhance ease of movement consisting of organized sessions of manual therapy of the fascial matrix, guided movement, and embodiment education.

SCOPE OF PRACTICE OF STRUCTURAL INTEGRATION

The practice of Structural Integration means the application of a coordinated system of manual therapy, guided movement, and embodiment education to the fascial matrix of the human body, including but not limited to:

1. Assessment of all connective tissues and of global patterns of posture and movement;
2. Organization of a session or series of sessions for treatment of those tissues and patterns;
3. Manual therapy using anatomically precise directional touch combined with specific client movement, including all body parts accessible through the skin, as well as oral and nasal cavities; and
4. Client education about body awareness and movement.

The practice of Structural Integration does not include:

1. Massage for relaxation or stress reduction;
2. High velocity joint manipulation;
3. Diagnosis of illness or disease; or
4. Prescription of medical therapeutic agents.

THE ORGANIZATION OF THE PROFESSION OF STRUCTURAL INTEGRATION

Structural Integration is based on the work of Dr. Ida P. Rolf, from which several related models for delivery of structural integration services have evolved.. Structural integrators are trained at structural integration education programs that meet the standards established by the International Association of Structural Integrators (IASI). Structural integrators demonstrate competence by passing the international certification examination administered by the Certification Board for Structural Integration (CBSI), certifying that they meet Core Competencies for Basic Structural Integration Practice. Board certified structural integrators must practice in accordance with IASI

Code of Ethics and Standards for the Practice of Structural Integration. To maintain the designation of Board Certified Structural Integrator (BCSI), structural integrators must meet CBSI's specific continuing education requirements of 72 hours every four years. Structural integrators adhere to ethical practice standards and contraindication protocols. Structural integration services are provided in partnership with clients of all ages in diverse settings such as private offices, ambulatory care and rehabilitation clinics, community health systems, homes, and hospitals and nursing care facilities.

APPENDIX 3: IASI Position Statement - Appropriate Regulation of Structural Integration



IASI Position Statement

Appropriate Regulation of Structural Integration

In response to the high prevalence in the United States of America of required state authorization to practice structural integration coupled with use of inappropriate standards in existing law and regulation for structural integration education, practice, and competency assessment, The Board of Directors of the International Association of Structural Integrators offers this policy guidance for legislators, regulators and other consumers.

- I. Structural integration is a distinct, specialized bodywork discipline with a unique scope of practice.
- II. Appropriate regulation, including exemption, of structural integration protects the public from unsafe and unqualified practitioners.
- III. Professional licensure boards can appropriately regulate structural integration practitioners, *provided that* regulations incorporate professional standards, educational requirements (initial and continuing), and competency assessment specific to the discipline of structural integration.
- IV. Safe practice of structural integration is assured by:
 - professional practice standards and defined scope of practice
 - professional standards for basic education
 - competency determination by examination
- V. The safe practice of structural integration requires demonstrated competency in:
 - visual assessment of global postural and movement patterns
 - manual assessment of fascial and myofascial tissues
 - manual therapy skills and movement education skills

- organizing a series of individualized sessions, based on the work of Dr. Ida P. Rolf, to increase clients' capacity for efficient, comfortable movement
- adherence to ethical and contraindication protocols

APPENDIX 4: IASI Code of Ethics & Standards of Practice Document



IASI Code of Ethics & Standards of Practice Document

Introduction

The IASI Code of Ethics is not meant to preclude any professional ethics code of any other individual or collective group, representing any faction of Structural Integration operating in the tradition of Ida P. Rolf, Ph.D. It is instead the general ethics code of IASI and is meant to offer a basic set of boundaries and principles as a guide to acceptable conduct. Ethical behavior is necessary to remain a member in good standing of the IASI.

This Code offers guidance for professional conduct and a vehicle for the assessment and appraisal of situations having ethical implications. This Code also is offered as a guide and an affirmation of the will of the IASI membership and is intended to protect their best interests and reputation while insuring the highest quality professional service to all of their clients.

IASI Code of Ethics

Client / Practitioner Relationship

IASI members are entrusted with the responsibility of creating an environment that allows the Structural Integration Client to have a rewarding and positive experience. IASI members will:

1. Ensure client safety, protecting them from unreasonable physical and emotional risk,
2. Enable and empower all clients in their growth and evolutionary process with empathy, dignity and caring,
3. Never discriminate against anyone in providing Structural Integration services because of race, creed, sex, sexual orientation, national origin or disability,
4. Engage only in honest and fair business practices,
5. Ensure that all Structural Integration practice is conducted in an alcohol and drug free environment,
6. Avoid all sexual relationships with clients
7. Never engage in sexual harassment of any kind or create a sexually intimidating or offensive environment.

Standards of Practice

All IASI members have a duty to adhere to the IASI Standards of Practice. IASI members will:

1. Only provide Structural Integration services for which they were properly trained, have proven competency and are recognized by their peers as capable to provide such services in the scope of their practices, 2
2. Accurately and truthfully represent IASI policies, actions and procedures,
3. Use the established IASI ethics procedures to resolve all complaints of conduct regarding charges from a client or charges between members,
4. Ensure client confidentiality and never breach the confidence of IASI, its Members or clients,
5. Never misrepresent themselves through information which is based on falsifications regarding accomplishments, qualifications, education, experience, certifications, licenses or criminal records.
6. Never misrepresent the nature and scope of their Structural Integration practice,
7. Provide clarity for clients, peers and public, by initiating the Structural Integration process with reference to the standard ten session series as a tradition inherited from Ida P. Rolf,
8. Seek advice and counsel of peers and other professionals whenever it is in the best interest of their clients.

Practitioner Conduct

All members of IASI are to be in compliance with all national, regional and local criminal codes. No member may have a felony criminal history. This includes any felony conviction resulting from entering a guilty plea, being found guilty by jury or judge or entering a no contest plea.

Development

Members of IASI should strive to increase their competency, skill and proficiency in the craft of Structural Integration. Members must take responsibility for remaining current on safety, health and developments that are relevant to the practice of Structural Integration. Members should accomplish this through participation in the following continuing education programs:

1. Clinics and seminars conducted by IASI,
2. Programs conducted by or approved by the members individual parent educational institutions,
3. Continuing education offered by other Structural Integration schools recognized and approved by IASI,
4. Continuing education offered by other organizations recognized as meeting the continuing education requirements by IASI.

Conflict of Interest

Members are responsible for avoiding conflicts of interest, both actual and perceived, while acting in a business capacity for IASI. It is unethical for any member to:

1. Achieve personal gain by using IASI services, their position in office, or authority inherent or implied or associated with their elected or appointed position in IASI,
2. Incur unsubstantiated, unnecessary and/or unreasonable debt in the name of or while representing IASI,
3. Participate in any decision-making mechanism within IASI that would result in their immediate or future personal gain.

Enforcement of the Code

Enforcement of the IASI Code of Ethics depends on voluntary compliance peer involvement, client participation and the support of all members.

1. Voluntary Compliance
 1. Any member who believes that another member has violated the IASI Code of Ethics, unless extraordinary circumstances dictate otherwise, should first address the concern directly with that member. The respondent member should comply completely to the satisfaction of the complainant member. A member of the Standards and Ethics Committee may be sought for a consultation and/or negotiation role in this part of the process.
 2. Any member in personal ethical conflict is required to seek advice and counsel of a peer and/or the IASI Standards and Ethics Committee.
2. Peer Involvement.
 1. Any member, who after addressing an Ethics concern directly to another member with unsatisfactory results, is obligated to file a signed, written complaint with the IASI National Headquarters and cooperate fully with all subsequent investigations.
 2. All members will cooperate fully with any investigation.
3. Client and Member Participation
 1. Any client, member or person outside of IASI, may file an ethics complaint.
 2. All written and signed complaints will be handled personally by the Executive Director, or his or her assigned representative, according to the IASI Bylaws.
 3. Before a complaint is sent to the Standards and Ethics Committee, all procedures will be explained to the complainant, both verbally and in writing.
 4. Both complainant and respondent will be supported by all staff and Committee members.
 5. Negotiation to a conclusion will be pursued initially when deemed appropriate by the Committee

6. At the end of the investigation, when necessary and appropriate, the Committee will present a detailed report, including recommendations, to the Board of Directors for final disposition.
7. All appeals will be made directly to the President of the IASI Board of Directors.

APPENDIX 5: List of States that Exempt or Exclude Structural Integration (or one of its forms, e.g., Rolfing, Rolf Structural Integration) from Massage Therapy Regulation, or Separately Regulate Structural Integration as an Independent Profession

States that Exempt or Exclude Structural Integration from Massage Therapy Regulation

Alaska:

Sec. 08.61.080. Exceptions to application of chapter. This chapter does not apply to a (10) person engaged only in the practice of structural integration for restoring postural balance and functional ease by integrating the body in gravity using a system of fascial manipulation and awareness who has graduated from a program or is a current member of an organization recognized by the International Association of Structural Integrators, including the Rolf Institute of Structural Integration;

Colorado:

Sec. 12-35.5-110. Scope of article - authority for clinical setting.

(1) Nothing in this article prohibits or requires a massage therapy license for any of the following:

(e) The person provides alternative methods that employ contact and does not hold himself or herself out as a massage therapist. For the purposes of this paragraph (e), “alternative methods that employ contact” include, but are not limited to:

(IV) Structural Integration practices such as Rolfing and Hellerwork;

Georgia:

§ 43-24A-19. Exceptions

Nothing in this chapter shall be construed to affect, restrict, or prevent the practice, services, or activities of:

(7) A person who uses touch and movement education to effect change in the structure of the body while engaged in the practice of structural integration, provided that he or she is a member of, or whose training would qualify for membership in, the International Association of Structural Integrators and provided that his or her services are not designated or implied to be massage or massage therapy;

Idaho:

54-4003. EXEMPTIONS. (1) Nothing in this chapter shall be construed to restrict any person licensed or regulated by the state of Idaho from engaging in the profession or practice for which they are licensed or regulated.

(2) Nothing in this chapter shall prohibit, prevent or restrict:

(h) The practice of persons engaged in the profession of structural integration, restoring postural balance and functional ease by integrating the body in gravity based on a system of fascial manipulation, awareness, and education developed by Dr. Ida P. Rolf, provided their services are not designated or implied to be massage or massage therapy. Such practices include, but are not limited to: Rolfing® structural integration, the guild for structural integration, Hellerwork®.

Illinois:

225 ILCS 57 Sec. 25. Exemptions.

(f) Practitioners of certain service marked bodywork approaches that do involve intentional soft tissue manipulation, including but not limited to Rolfing, Trager Approach, Polarity Therapy, and Orthobionomy, are exempt from this Act if they are approved by their governing body based on a minimum level of training, demonstration of competency, and adherence to ethical standards.

Maine:

Title 32, Chapter 127

Sec. 14307 Exemptions to registration or certification

2. Other exemptions. This chapter does not apply to the activities and services of individuals who practice other forms of tissue work exclusive of massage therapy, such as rolfing, Trager, reflexology, Shiatsu, Reiki and polarity, if those practitioners do not use the title "massage therapist" or "massage practitioner," unless they choose to meet the requirements of this chapter.

Massachusetts:

269 CMR 2.00: Definitions

Massage Therapy also shall not include the practice of a person who uses touch, words or directed movement to deepen awareness of the patterns of movement in the body, or the affectation of the human energy system or acupoints or Qi meridians of the human body while engaged within the scope of practice of a profession with established standards and ethics, including, but not limited to, the Feldenkrais Method, Reflexology, The Trager Approach, Ayurvedic Therapies, Rolf Structural Integration, Polarity or Polarity Therapy, Polarity Therapy Bodywork, Asian Bodywork Therapy that does not constitute Massage as defined in M.G.L. c. 135, Acupressure, Jin Shin Do, Qi Gong, Tui Na, Shiatsu, Body-mind Centering and Reiki. For purposes of 269 CMR *et seq.*, the use of the term "Massage" shall also mean the term "Massage therapy".

Montana:

37-33-404. Exemptions -- rules.

(5) (a) The provisions of this chapter do not limit or regulate the practice of any person who uses:

(iii) touch to effect change on the integration of the structure of the physical body.

Exempt practices under this subsection (5)(a)(iii) include but are not limited to the Rolf method of structural integration, Rolfing, and Hellerwork.

New Mexico:

Title 16, Chapter 7, Part 4.9

LICENSURE EXEMPTIONS: The following are exempted from licensure by the board pursuant to Section 61-12C-5.1 of the Massage Therapy Practice Act.

D. Sobadores; Hispanic traditional healers; Native American healers; reflexologists whose practices are limited to hands, feet and ears; practitioners of polarity, Trager approach, Feldenkrais method, craniosacral therapy, Rolfing structural integration, reiki, orthobionomy or ch'i gung; or practitioners of healing modalities not listed in this

subsection who do not manipulate the soft tissues for therapeutic purposes from practicing those skills. However, if any of these persons applies for and is granted a license pursuant to the Massage Therapy Practice Act, that person shall comply with all licensure requirements and be subject to the provisions of the boards' statute and regulations.

Wisconsin:

Chapter 460

460.03 Applicability. A license under this chapter is not required for any of the following:

(2m) (a) A person who does any of the following and who satisfies the requirements of par. (b):

3. Uses touch and education to effect change in the structure of the body while engaged in the practice of structural integration.

(b) The person is recognized by or meets the established standards of either a professional organization or credentialing association that recognizes a person in a practice after that person demonstrates an adequate level of training and competency and adherence to ethical standards.

(c) A person who is exempt from licensure under this subsection may use the terms "bodywork," "bodyworker," and "body- work therapy" to identify his or her practice.

States in which the laws do not specifically reference Structural Integration, but the massage boards have stated they do not consider Structural Integration to be massage:

Texas

Arizona

Structural Integration Regulated as a Separate and Independent Profession:

New Hampshire:

New Hampshire regulates Structural Integration as a separate profession:

<http://www.dhhs.nh.gov/oos/blc/bodyworker/documents/RSA328H.pdf>. There is a separate board for the non-massage bodywork modalities established by this law.

The definition of Structural Integration under New Hampshire law is:

Title XXX

Occupations and Professions

Chapter 328-H

Reflexologists, Structural Integrators, and Asian Bodywork Therapists

328-H:2, Definitions

VII, "Practitioner" means a person who practices touch therapies for compensation.

These practitioners include:

(b) Structural integrators who hold current certification from the International Association of Structural Integrators or the Rolf Institute;

Also, under 328-H:3 Scope of Practice...

II. Structural integrators restore postural balance and functional ease by systematically aligning and integrating the human body in gravity. Structural integrators work through

manipulation of the connective tissue matrix, enhancement of the client's awareness, and education.

Nevada:

Nevada submitted AB179 this week for consideration this legislative session. This bill has the support of the massage board as well as the local Structural Integration community: <https://www.leg.state.nv.us/App/RELIS/REL/79th2017/Bill/4943/Overview>

Crystal Koeneman

From: Deb McCusker <debmccusker@yahoo.com>
Sent: Tuesday, February 14, 2017 3:57 PM
To: Rep. Sam Kito
Cc: representative.Louise.Statutes@alleged.gov
Subject: Massage exemption

Dear Committee Members,

My name is Deborah McCusker. I have been practicing massage in Kodiak, AK for 20 years. I have some comments concerning exemption for Rolfers and Structural Integrationists from the massage therapy law.

It is difficult to separate Rolfing, Structural Integration, and Massage Therapy. According to the definition in the Alaska Massage laws they appear to be related. Rolfing and Structural Integration being one of many modalities of Massage Therapy.

Many massage therapists go on to study and practice Structural Integration but they will still use massage techniques in their practice. Other massage therapists integrate techniques that may also be used by Structural Integration and Rolfing practitioners. My own deep tissue massage training at the San Francisco School of Massage was taught by certified advance Rolfers.

I think all types of body work should be included in the Alaska massage laws. Any exemptions should have an application process.

Respectfully,
Deborah McCusker

[Sent from Yahoo Mail on Android](#)

Crystal Koeneman

From: Christine Carlson <hellofriendcc@gmail.com>
Sent: Tuesday, February 14, 2017 2:32 PM
To: Rep. Gary Knopp; Rep. Sam Kito; Rep. Mike Chenault
Subject: HB 110

Hello,

My name is Christine Carlson and I have lived in Alaska for over 30 years. We currently reside in Kasilof. Phone number is 907-394-8085.

I am familiar with both rofling and massage therapy and can assure you there is a major difference between the two. They are distinctly different professions. I am able to have full mobility today due to some extensive rofling care, following 3 major accidents I was involved in.

This is a bureaucratic overreach and an unnecessary regulation. I oppose HB 110.

Thank you,

--

Christine Carlson

Crystal Koeneman

From: Michelle Niland <michelleniland@yahoo.com>
Sent: Sunday, February 12, 2017 9:46 AM
To: Rep. Sam Kito; Rep. Adam Wool; Rep. Andy Josephson; Rep. Louise Stutes; Rep. Colleen Sullivan-Leonard; Rep. Gary Knopp; Rep. Mike Chenault; Rep. Bryce Edgmon
Subject: Please vote down any bill to raise massage education hours.

Hello All,

If you allow Kito to raise the number of hours required for massage therapists, this **ABSOLUTELY WILL** affect current therapists (myself included). If a therapist who attended a 500hr school wanted to take a break from practicing, they would be ineligible to become licensed again without going back to school.

In addition, it asks new massage therapists to incur yet even greater costs in order to practice legally in the state. If you read the comments on the Alaska Massage Therapist regarding whether or not licensing has advantaged therapists, you will find that most do not appreciate it. Now Kito plans to add more cost.

Please vote this bill down.

I have done a copy and paste here of a pole that a therapist called for just last week. Please read it and familiarize yourselves with how practitioners feel about the board and the already cumbersome and expensive licensing requirements. They feel they are not represented by the board, requirements are already too strict and I don't see anyone calling out for this field to become even more expensive. Please stop making Alaska a difficult and less desirable place to work.

Thank you for your consideration,
Michelle Latham

[Ed Toal](#)

[February 1 at 11:28pm](#)

Are the majority of Alaskan massage therapists happy with being licensed by the state? Are people seeing a benefit or is it just an expensive hoop to jump through? Speak up!

Comments

[Sandrenia Katasse](#) I feel like it's an expensive hoop for anyone...(me) who only does massage 2-6 hours a week at a chiropractor's office it's a couple months of paychecks to afford the stupid piece of paper! Then you have to save up to pay for the CEU's I don't have those kind of hours to pay for it all

[Like](#) · [Reply](#) · [12](#) · [February 1 at 11:40pm](#) · [Edited](#)

[Lisa Hunt](#) It limits some really talented massage therapists from being able to afford to practice on a part time basis. It is also difficult for therapists who are starting out, who do not have an established clientele.

[Like](#) · [Reply](#) · [3](#) · [February 2 at 1:10pm](#) · [Edited](#)

[]

Write a reply...

[Megan Michelle](#) Expensive hoop. It isn't going to deter those who were practicing illegally...

[Like](#) · [Reply](#) · [7](#) · [February 1 at 11:33pm](#)

[Matt Wyles](#) Bs all around

[Like](#) · [Reply](#) · [4](#) · [February 1 at 11:34pm](#)

[Megan Michelle](#) Between the initial license fee and the mandatory CEU hours to maintain the license in good standing, it's just ridiculous, especially working independently.

[Like](#) · [Reply](#) · [3](#) · [February 1 at 11:38pm](#)

[Melissa Mills](#) I have seen no added benefit. I billed insurance before this licensing came to be; so it's a wash in my book as far as that being an argument for the licensing. My biggest complaint is the price point and having to repeat that finger printing process each renewal.

[Like](#) · [Reply](#) · [4](#) · [February 1 at 11:43pm](#)

[Sandrenia Katasse](#) I agreed having to redo the fingerprinting is dumb as F**K and paying more than a doctor does for their license 🙄

[Like](#) · [Reply](#) · [2](#) · [February 1 at 11:45pm](#)

[Megan Michelle](#) [Sandrenia Katasse](#) RN's too!

[Like](#) · [Reply](#) · [February 1 at 11:47pm](#)

[View more replies](#)

[Cheska Kester-Fortenberry](#) I think it should be disbanded. Its just more policing that lagit therapists didn't need. And those doing illegal things were already being busted by other laws in place. If you do this part time. Which majority can not maintain a 32 to 40 hours ...[See More](#)

[Like](#) · [Reply](#) · [4](#) · [February 2 at 12:04am](#)

[Lynx Mullen](#) Well it is going to run me out of business cause as little as I work it takes about 1/2 what I make a year. It is wrong that it costs more than for a Dr or nurse. Our CEU's are more expensive too.

[Like](#) · [Reply](#) · [6](#) · [February 2 at 1:57am](#)

[Christen Marrielle King](#) It's crazy to me that we have to pay more than DR! Baffles me

[Like](#) · [Reply](#) · [February 5 at 2:54pm](#)

[Lynx Mullen](#) I know more powerful lobby?

[Like](#) · [Reply](#) · [February 5 at 2:55pm](#)

[]Write a reply...

[Sharla Rose](#) I agree that this policy does nothing for my business but cause stress. It's a bummer.

[Like](#) · [Reply](#) · [1](#) · [February 2 at 2:14am](#)

[Cassandra Lidin](#) Just for the record, Acupuncturists maintain a license to practice, as well as all other health providers. I wish you all well

[Like](#) · [Reply](#) · [February 2 at 5:50am](#)

[Sharla Rose](#) I understand that other health care providers are licensed but many of them can practice 30 to 40 hours a week and charge at least twice as much as I can doing massage. I am on my 17th year doing massage and can only do so many massages in a week whi...[See More](#)
[Like](#) · [Reply](#) · [4](#) · [February 2 at 7:28am](#)

[Ed Toal](#) Acupuncturists don't have a board. They are licensed through the Alaska State Division of Corporations, Business, and Professional Licensing. The Department of Commerce, Community, and Economic Development adopts regulations to carry out laws governing...[See More](#)
[Like](#) · [Reply](#) · [3](#) · [February 2 at](#)

[Amanda Vogus](#) Expensive.....to say the least. Inefficient and not what was promised. Very unhappy with the process and feeling very "used" by the state and board.
[Like](#) · [Reply](#) · [5](#) · [February 2 at 6:16am](#)

[George E. Elmore](#) This whole thing is a clusterf**k...I am being forced to get re-licensed and my job is at stake...Noone has given me any clear answers on what hoops to hurdle and I am now seriously considering going to an attorney...This is a comic strip at best...
[Like](#) · [Reply](#) · [2](#) · [February 2 at 7:34am](#)

[Ed Toal](#) The carrot that was held out by proponents of the licensing law was that MTs would be able to bill insurance directly. Anybody having any luck with that?
[Like](#) · [Reply](#) · [1](#) · [February 2 at 8:07am](#)

[Tammy Gifford](#) Following
My biller says NO at this point
[Like](#) · [Reply](#) · [1](#) · [February 2 at 9:07am](#)

[Ed Toal](#) [Tammy Gifford](#) can you elaborate? Your biller says you can't bill insurance at all?
[Like](#) · [Reply](#) ·

[Christy O'Brien](#) As a recent massage school grad - my experience to get licensed was not easy and I have watched a number of people have great difficulty getting licensed as well. I don't think that having a license is a bad thing at all - I guess I am just bitter about it because I am going to have to go through the whole process again this year and it was an expensive nightmare last time.
[Like](#) · [Reply](#) · [4](#) · [February 2 at 8:42am](#)

[George E. Elmore](#) I was supposed to be "grand-fathered" in...What a joke...I'm seriously thinking about moving out of state so I might continue our profession in a more accesive environment...To help people...That's what we do...
[Like](#) · [Reply](#) · [4](#) · [February 2 at 8:54am](#)

[]

[Tammy Gifford](#) I've been looking around because my partner and I would like to be licensed in multiple states. And Alaska is by far the most expensive state to be licensed in. I know that we all complain about how much this costs us and when you compare it to other m...[See More](#)
[Like](#) · [Reply](#) · [2](#) · [February 2 at 9:09am](#)

[Ed Toal](#) Midwives pay more now because of investigation costs and legal expenses. Same could happen to massage therapists. If someone brings legal action against the board, we all pay the bill.
[Like](#) · [Reply](#) · [2](#) · [February 2 at 9:15am](#)

[Tammy Gifford](#) Technically yes. But the board has also sat on some investigations for years and investigate things that don't need investigation- it sucks because there are some "professionals" in the valley that have a vendetta against the midwives.

Anyway, there are better ways to pay for things. Other states are doing well while charging less in licensing fees

[Like](#) · [Reply](#) · [2](#) · [February 2 at 9:19am](#)

[Christy O'Brien](#) I was told recently that if I want my license on time this year when our licenses all expire September 30, that I will need to re-submit everything in June. Fingerprinting, proof of blood borne pathogens & CPR, notarized signature, application, etc. ...[See More](#)

[Unlike](#) · [Reply](#) · [6](#) · [February 2 at 9:23am](#)

[Ed Toal](#) You are right to be distrustful.

[Like](#) · [Reply](#) · [1](#) · [February 2 at 9:27am](#)

[Tammy Gifford](#) Wow

Thank you for your diligence

[Like](#) · [Reply](#) · [1](#) · [February 2 at 9:33am](#)

[Amanda Vogus](#) I went through the almost same experience with the state. Very frustrating.

[Like](#) · [Reply](#) · [February 2 at 9:30am](#)

[Ben James Smith](#) Considering everything is regulated these days I'm not completely opposed to that, I like the ceu requirements because most people never study after school, and the 40 credits or so over 4 years I think is fair, but I think we are way way overcharged ...[See More](#)

[Like](#) · [Reply](#) · [2](#) · [February 2 at 9:51am](#) · [Edited](#)

[Ed Toal](#) I am just asking if people are successfully billing insurance outside a doctor's office. Of course the client/patient would need a doctor's referral in any case.

[Like](#) · [Reply](#) · [1](#) · [February 2 at 9:33am](#)

[Ben James Smith](#) In that case, yes I have been successful with Blue Cross, I started billing last December, but it took I think BC 8 months before I was approved, I am sure it still wouldve worked with out that, but I believe it delays payment another few weeks

[Like](#) · [Reply](#) · [1](#) · [February 2 at 9:41am](#)

[Michelle Latham](#) I think is is just another revenue stream for the government. Another way to tax the working. That said, I think continuing ed is great for some massage therapist who work in clinical/therapeutic settings and who's work is billed for coverage by insurance, but for those working in spa settings, I don't think they should be forced to take them.

[Like](#) · [Reply](#) · [2](#) · [February 2 at 9:55am](#)

[Judy Macnak](#) I felt it was a bad idea when it was first proposed and still feel that way. I feel it is especially hardship-inducing on those who only work part-time, which I suspect is the case with most therapists in the state. I am wondering about the experience of those who live in remote areas of the state.

[Like](#) · [Reply](#) · [3](#) · [February 2 at 10:22am](#)

[Arli Wynn](#) The laws they have passed made massage therapy licenses prohibitively expensive. This whole thing was a mess from the beginning. It cost our AMTA members 10,000 in consulting fees alone! I said it from the beginning, this was a horrible idea...

[Like](#) · [Reply](#) · [5](#) · [February 2 at 10:28am](#)

[Rhema Smith](#) Its very expensive, especially if you are a part time therapist. Between insurance annual license and other fees and CE . Most states are \$150 a year or two years. I hope this can come down in cost. This is a very seasonal state still.

[Like](#) · [Reply](#) · [3](#) · [February 2 at 10:45am](#)

[Jasmine Nickell](#) Yes people can bill directly

[Like](#) · [Reply](#) · [2](#) · [February 2 at 10:47am](#)

[Ed Toal](#) Do you bill directly yourself?

[Like](#) · [Reply](#) · [February 2 at 10:50am](#)

[Jasmine Nickell](#) No but I know people here in Fairbanks doing it- they become premier preferred providers, but Aetna and other companies don't require that – clients need to bring in a prescription but it can be from a chiropractor or any doctor etc- The rate is \$120- 140 an hour that's accepted by insurance, but much better when not giving a large percentage to whomever we're working for!

[Like](#) · [Reply](#) · [February 2 at 10:52am](#) · [Edited](#)

[View more replies](#)

[]Write a reply...

[Elizabeth Block Haus](#) It's a joke! The same "Asian therapeutic massage" places are still in business and still have massage in the name. I don't see any benefit to me whatsoever except I get to fork out \$\$ and \$\$ and then some \$\$ for ceu's so I can give the state some more \$\$\$.

[Like](#) · [Reply](#) · [6](#) · [February 2 at 10:51am](#)

[Elizabeth Block Haus](#) If I were working out of my home I would drop out of the whole licensing scam but I work out in public so I'm compelled to keep it.

[Like](#) · [Reply](#) · [February 2 at 11:07am](#)

[Vickie Baker](#) The cops know where those questionable "massage" places are. They have "table shampoo" right there on the windows, on the doors, on Craigslist list, and they don't bust them. Why? I can give you a few guesses.... and it has nothing to do with them not knowing.

[Like](#) · [Reply](#) · [February 4 at 1:55pm](#)

[Elizabeth Block Haus](#) Also, I think if they did anything at all to promote massage or make certain mt's were getting a standard minimum wage per hour then maybe it would be worth it. How much does Massage Envy pay? How much do chiropractors make off of their LMTs? Just a thought.

[Like](#) · [Reply](#) · [7](#) · [February 2 at 11:01am](#)

[Tammy Gifford](#) \$18 an hour or per massage

I think -

[Like](#) · [Reply](#) · [February 2 at 12:44pm](#)

[]Write a reply..

[Jasmine Nickell](#) However, we do need to keep raising our standards here in Alaska even if it's not completely cleaned up right away, it's only been a small amount of time since the licensing in effect- but hopefully the fees will go down – massage therapy is a respected and lucrative career if done right, I've been doing it for 13 years – it's also one of the top 10 growing careers in the state of Alaska now

[Like](#) · [Reply](#) · [1](#) · [February 2 at 11:05am](#)

[Ed Toal](#) So you are pro-licensure? So far the only one on this thread.

[Like](#) · [Reply](#) · [February 2 at 11:06am](#)

[Jasmine Nickell](#) Yes, but I think that the fee is way too high and there should be penalties for people that do not follow through and keep the standard for the rest of us

[Like](#) · [Reply](#) · [February 2 at 11:07am](#)

[Kara Hawley](#) I'm not seeing benefits for myself. If clients like to see some kind of certification, I was already nationally certified. This is just an added huge expense on top of all the other fees I have to keep up with. It's too much.

[Like](#) · [Reply](#) · [3](#) · [February 2 at 11:41am](#)

[Lisa Hunt](#) Agreed!

[Like](#) · [Reply](#) · [2](#) · [February 2 at 1:04](#)

[Gayle Mcmurtery](#) For those of you looking to get licensed in other states, I will tell you what I am currently going through..

I'm moving to Bellingham, WA this year. Last summer, WA state passed a law that states if you did not go to massage school in the state of WA...[See More](#)

[Like](#) · [Reply](#) · [3](#) · [February 2 at 12:46pm](#)

[Tammy Gifford](#) Yes

I saw that

They also have this same law for midwives there 😞☹️ ...[See More](#)

[Like](#) · [Reply](#) · [February 2 at 12:47pm](#)

[Kara Hawley](#) Yuck! I used to practice in Bellingham and being Nationally certified was good enough for licensing...not to mention licensing was \$10/year!

[Like](#) · [Reply](#) · [February 2 at 12:47pm](#)

[Arli Wynn](#) I am currently going through the process of licensing in Oregon. It is cheaper and easier to be licensed here in Oregon than it is in my home state of Alaska. After practicing in AK for 13 years, I decided to move to avoid this licensure fiasco.

Orego...[See More](#)

[Like](#) · [Reply](#) · [4](#) · [February 2 at 3:03pm](#) · [Edited](#)

[Jessi Dullinger](#) I see absolutely no benefits. Expensive hoop to jump through.

[Like](#) · [Reply](#) · [2](#) · [February 2 at 3:15pm](#)

[Jessi Dullinger](#) Maybe if insurance started covering massage as preventative care.

[Like](#) · [Reply](#) · [2](#) · [February 2 at 3:20pm](#)

[Erik Schreier](#) I have seen no benefit nor has anyone ever inquired about it. Very expensive and disorganized.

[Like](#) · [Reply](#) · [February 2 at 3:23pm](#)

[Jasmine Nickell](#) Well yes it is several hundred a year that averages out, but our liability is extreme low, I'm paying \$200 a year! Even though the rates are high, massage therapy is an excellent and lucrative field, and it has been gratifying and awesome to work in!!!!...[See More](#)

[Like](#) · [Reply](#) · [2](#) · [February 2 at 3:31pm](#)

[Michelle Latham](#) You get tax write offs without actually needing to spend the money. The standard deduction is greater than the licensing fee+liability (FYI)

[Like](#) · [Reply](#) · [1](#) · [February 3 at 1:56pm](#)

[Jasmine Nickell](#) I'd support a petition to the state if someone stated one, asking to lower fees and possible ceu-

[Like](#) · [Reply](#) · [4](#) · [February 2 at 3:35pm](#)

[Cassandra Lidin](#) As a provider in a sister profession, I hope Alaska massage therapists identify the many benefits of a professional license, and figure out how to have constructive professional conversation with your board. My impression of the move toward licensure w...[See More](#)

[Like](#) · [Reply](#) · [4](#) · [February 2 at 6:59pm](#)

[Christo Ferrell](#) Hoops!

[Like](#) · [Reply](#) · [1](#) · [February 2 at 8:44pm](#)

[Yael Martin Hickok](#) I have found no benefit in being state licensed. It's expensive, confusing, and adds extra work for me to make sure my team members were all current in their licenses as well. The public in general do not know the difference between a licensed or unlic...[See More](#)

[Unlike](#) · [Reply](#) · [9](#) · [February 2 at 10:20pm](#)

[Elizabeth Block Haus](#) Did any of the authors of this fiasco think to include a clause that abolishes it in case it doesn't work out?

[Like](#) · [Reply](#) · [4](#) · [February 2 at 10:39pm](#)

[Arli Wynn](#) While I was fighting the enactment of this misguided law I remember having a conversation with the authors regarding a clause similar to that. That if this law was not benefiting the people, it could be repealed within two years. I haven't see the statue recently. I couldn't say if that was edited out in the end.

[Like](#) · [Reply](#) · [1](#) · [February 3 at 7:28am](#)

[Ed Toal](#) The self destruct button was not included in the language. There is still a lot of bad blood in Juneau against the law though.

[Like](#) · [Reply](#) · [1](#) · [February 3 at 7:31am](#)

[Arli Wynn](#) Dang. That's ok, we can still have this thing repealed, it'll just take more work.

[Like](#) · [Reply](#) · [February 3 at 7:52am](#)

[Lynx Mullen](#) I think that having a state wide license is good. But the way it is done is just cumbersome. Why can it not be easy? I think that making us prove we are innocent instead of just making it part of a court function that if someone is convicted of an in...[See More](#)
[Like](#) · [Reply](#) · [4](#) · [February 3 at 12:58pm](#)

[Melanie Willert](#) Expensive hoops.
[Like](#) · [Reply](#) · [2](#) · [February 3 at 1:31pm](#)

[Tammy Gifford](#) I feel like if the state is not going to enforce the regulations then why bother?
I just heard today of a "student" therapist charging clients \$40 for a 2 hour massage and taking a couple clients a day to "get their hours in" ...[See More](#)
[Like](#) · [Reply](#) · [1](#) · [February 3 at 4:27pm](#) · [Edited](#)

[Melissa Anne Mitchell MassageTherapist](#) So they went to school or they are just saying they are a student and they have no training?
[Like](#) · [Reply](#) · [1](#) · [February 3 at 6:56pm](#)

[Tammy Gifford](#) They said they were trying to become a massage therapist and trying to get their hours in so they were taking clients at home ... I don't know
I couldn't even formulate a coherent comment
[Like](#) · [Reply](#) · [February 3 at 8:00pm](#)

[Michelle Latham](#) I completely agree that it is fishy for a school to be able to charge money for a massage from an unlicensed therapist. Fishy indeed.
[Like](#) · [Reply](#) · [February 3 at 2:27pm](#)

[Arli Wynn](#) Charging money for student massage therapy is common.

Many schools run "massage clinics" in order to assist students in receiving "real world" training. All students should be insured by the company of their choice of course. ...[See More](#)
[Like](#) · [Reply](#) · [5](#) · [February 3 at 3:48pm](#) · [Edited](#)

[Ed Toal](#) It is written into statute anyway. It is legal.
[Like](#) · [Reply](#) · [February 3 at 3:56pm](#)

[Kara Hawley](#) Yep! My school did it.
[Like](#) · [Reply](#) · [February 3 at 4:23pm](#)

[Melissa Anne Mitchell MassageTherapist](#) I think the fee is high, but realistically it cost us \$6.25 a week. If you save that every week and put it in a bank account you won't have to come up with \$650 when it's time to renew. I do agree that the fingerprinting every year is quite ridiculous...[See More](#)
[Like](#) · [Reply](#) · [2](#) · [February 3 at 7:34pm](#) · [Edited](#)

[Christi Day Maher](#) Wait I need clarification on the renewal fee. I thought it said on the website \$250

[Like](#) · [Reply](#) · [February 3 at 10:37pm](#)

[Melissa Anne Mitchell MassageTherapist](#) I dont know I haven't looked at it yet. I was just breaking it down from the 650.00

[Like](#) · [Reply](#) · [February 3 at 10:55pm](#)

[View more replies](#)

[Arien Reed](#) I respect being licensed but it's way too expensive here. They say that it has to be a financially self-supported board, but then the head of the board told me himself that way more therapists applied than they thought would...so then reduce the fee!! ...[See More](#)

[Like](#) · [Reply](#) · [11](#) · [February 4 at 6:45pm](#) · [Edited](#)

[Charmine Mallipudi](#) I haven't gotten anything from it except an expensive piece of paper saying I'm state licensed

[Like](#) · [Reply](#) · [3](#) · [February 4 at 7:45pm](#)

[Karen Renee Groce](#) Not happy at all with the licensing requirements and especially the outlandish fees. There's no way to prorate the fees, which is totally unfair. The entire health licensing procedure should be overhauled.

[Like](#) · [Reply](#) · [4](#) · [February 5 at 11:51am](#)

[Jennifer Andrulli](#) I have experienced no benefits,

[Like](#) · [Reply](#) · [3](#) · [February 7 at 2:47pm](#)

[Christo Ferrell](#) I am kinda to the point of wanting to leave the country....with the state and obamacare added together makes it very difficult to do this job anymore, I'm tired of new things popping up finding excuses to take my money lol

[Like](#) · [Reply](#) · [3](#) · [February 7 at 3:21pm](#)

[Stefanie Immediato Gambino](#) I'm licensed in 3 states total and AK is the most expensive and ridiculous. It's hard to find any real info on the website about renewal and having to get fingerprinted every year is insane. I used to think licensing was a good idea, but now I see its...[See More](#)

[Like](#) · [Reply](#) · [4](#) · [February 7 at 9:46pm](#)

[Kirk Wilson](#) Still really interested in the development of the apprenticeship part of initial licensure application acceptance.

[Like](#) · [Reply](#) · [1](#) · [February 7 at 10:43pm](#)

[Vanessa Campbell](#) I find it way too expensive, I personally haven't seen a benefit. The fingerprinting each time I renew is unnecessary and costly.

[Like](#) · [Reply](#) · [2](#) · [February 8 at 6:35am](#)

[]

Write a comment...

Crystal Koeneman

From: Ron Gibbs <healingharbor@icloud.com>
Sent: Monday, February 13, 2017 11:13 AM
To: Rep. Sam Kito; Rep. Adam Wool; Rep. Andy Josephson; Rep. Louise Stutes; Rep. Chris Birch; Rep. Gary Knopp; Rep. Colleen Sullivan-Leonard; Rep. Mike Chenault; Rep. Bryce Edgmon
Subject: HB110

Dear Committee members:

My name is Ron Gibbs. I am and have been a massage therapist in Kodiak for the past 13 years. While I serve as member of the State Board of Massage therapy, I am writing you with my concerns as an individual therapist. I am writing in support of HB110.

I am particularly concerned about the proposed change to the exemption section of this bill.

In the passage of the original bill (HB328) the Rolfers and Structural Integrationists lobbied hard for an exemption claiming that they were not massage therapists even though the definition definition of massage therapy, in **Sec. 08.61.100 Definitions**, encompasses the scope of their practice.

(5) "practice of massage therapy" means the provision, for compensation, of a service involving the systematic manipulation and treatment of the soft tissues, including the muscular and connective tissues of the human body, to enhance the functions of those tissues and promote relaxation and well-being; in this paragraph, "manipulation and treatment"

The result of this lobbying campaign was the following language in the bill:

(10) person engaged only in the practice of structural integration for restoring postural balance and functional ease by integrating the body in gravity using a system of fascial manipulation and awareness who has graduated from a program or is a **current member** of an organization recognized by the International Association of Structural Integrators, including the Rolf Institute of Structural Integration;

I believe that people who practice structural integration are simply specializing in a modality that falls under the general category of massage therapy. I attended the Utah College of massage therapy, which is part of the Steiner Education group. This group has 30 massage schools located in 13 different states. Part of my curriculum included two quarters of coursework in Structural Integration and one quarter in Reflexology. I recently completed coursework for advanced certification in myofascial techniques from an organization that is founded and taught by former instructors from the Rolf Institute. While trademark prevents using the term Rolfing, the techniques used are identical to those taught in those programs. While these practitioners may be specialized in those modalities, they are not so unique as to be exempt from the regulations all of us are required to follow. They are providing *for compensation, a service involving the systematic manipulation and treatment of the soft tissues, including the muscular and connective tissues of the human body, to enhance the functions of those tissues*. How is that different from what massage therapy. There are many modalities in our profession, some therapists use combinations of them as tools to meet the needs of their clients, others move to specialize their skill set and use only one modality.

The Alaskan Rolfers and Structural integrationists approached the board of massage therapy and expressed their intent to pursue their own licensure. They argued that the requirements for massage therapy such as the

MBLEX exam was not relevant to their area of specialization. They asked for patience from the Alaska Board while they pursue this. HB110 goes a long way toward helping them in their cause. By requiring that in order to have an exemption they must prove they are not just **members** of an organization but **professionally certified** by that organization, it levels the playing field and provides the public with a guarantee that they meet the same standards of professionalism that apply to the 900+ massage therapists now licensed in Alaska. Professional certification means that these therapists have passed a national exam, paid dues, are required to fulfill continuing ed requirements and adhere to a code of ethics. This is a valid compromise, in my opinion, and registering for this exemption is the only way we can be assured that these practitioners are what they claim to be. The International Association of Structural Integrators do not have regulatory authority. That authority rests with the State of Alaska and specifically, the Board of Massage Therapists. By meeting the requirements outlined in HB110 the structural integrationers are moving closer to their stated goal of obtaining a unique licensure for their domain.

Thank you for your consideration.

Ron Gibbs

February 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I am a Certified Advanced Rolfer here in Anchorage and in 1982, myself and Rolfer, Linda Jordan have established the fine reputation that our profession has held. I have owned and operated my sole proprietor business since that time. Now, I am one of roughly 55 Rolfers/Structural Integrators practicing in the state. Our group of professionals is in consensus that the current language that was in the original HB 328 relating to our exemption should remain intact.

In 2013-14, many Rolfers worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with the national associations, American Massage Therapist Association (AMTA) and the Alaska Body Massage Professionals (ABMP) – the primary advocates for massage licensing legislation. HB328 passed in 2014 with the support of Rolfers. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

1. It is important to clarify that Rolwing is a distinctly different profession from massage therapy. And it is not massage therapy. Clients that seek the services of Rolwing®, also known as Structural Integration, do so because they have generally been referred to us by other medical specialists such as osteopaths, physical therapists, surgeons, sport trainers, etc. Personal referrals by friends and colleagues are quite common. Specific problems in movement, gait, scar tissue, assymetrical alignment and much more, bring people into our offices. Structural Integration is based on the work of Dr. Ida P. Rolf. Dr. Rolf specialized in the study of collagen in the early 1920's. Collagen is the protein that is basis of the connective tissue matrix and can be mechanically manipulate. She created a system of manual therapy and movement education designed to improve biomechanical function and postural alignment based on her scientific understanding of elasticity of fascia. Results are achieved by combining of manual assessment and manipulation of the connective tissue matrix, as well as visual assessment of postural and movement patterns. Structural Integration is highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction. Clients are well aware that Rolwing and massage are different modalities and choose accordingly. As a practitioner of 35 years, I feel my life's work has made a tremendous impact on the well being of my clients. Frankly as I near retirement, I am disheartened by these attempts of regulate my profession.

Barbara A. Maier

Certified Advanced Rolfer ®

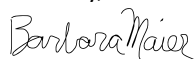
2. The intent of HB110 is not clear as it relates to exemptions in current statute. Rolfers participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Rolfig or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve. I would say that the intent of HB110 is bureaucratic over reach and discriminatory to our profession that has led the way in the manual therapy field in Alaska.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.
4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists. Additionally, being forced to register on this site without explanation is an affront. Also, Rolfers have no voice in future requirements, fees, policy changes, etc.

Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of myself and my colleagues, is that we do not wish to participate in Alaska's regulatory framework for Massage Therapists. Simply said, we are not massage therapists. We are Rolfers and Structural Integrators. We need to be consistent with the nationally agreed upon exemption for Rolfig (and other Structural Integration professionals) between members of the The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations, which have existed since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks. Because of our growth, we will now be able to pursue our own professional license and already have been working on a draft. I believe HB110 is a rush to legislate, based on unclear reasons, regulatory overreach and more.

I look forward to speaking on the upcoming conference call on 2/15/17. I am more than willing to have any member of Labor and Commerce Committee, contact me at my office number 907 562-0926.

Sincerely,



Barbara Maier

Certified Advanced Rolfer®

Cc: House Labor and Commerce Committee, House Finance Committee

Barbara A. Maier

Certified Advanced Rolfer®

February 12, 2017

To Whom This May Concern:

I am a Certified Advanced Rolfer and have been Roling in the Anchorage community for 29 years. We are presently legally exempt from the Alaska Massage License. We want to remain exempt. Roling is very different from massage. We have different training and our goals are not the same. It does not make any sense to require us to have a license that has nothing to do with our work. I do not understand why the massage community is now trying to take our exemption away.

Barbara Kavanagh
Certified Advanced Rolfer
3340 Arctic Blvd Ste 204
Anchorage, AK 99503
[907-563-0865](tel:907-563-0865)

Chery Van Der Horn
PO Box 16164
Two Rivers, AK 99716

February 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I practice Rolfing, structural integration in Fairbanks AK. I am one of roughly 55 Rolfers/Structural Integrators practicing in the state. Our group of professionals is in consensus that the current statutory language relating to our exemption should remain intact.

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with national associations American Massage Therapist Association (AMTA) and the Alaska Body Massage Professionals (ABMP) – the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

1. It is important to clarify that Rolfing is a distinctly different profession and is not massage therapy. Rolfing®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual assessment of the connective tissue matrix as well as visual assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction.
2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Rolfing or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.

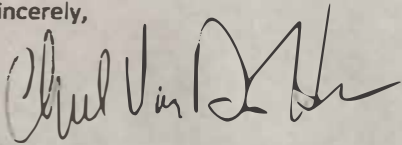
4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists.

Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of the The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at 907-750-0022

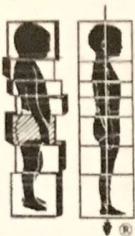
Sincerely,



Cheryl Van Der Horn

2/12/17

Cc: House Labor and Commerce Committee, House Finance Committee



Edward Toal
Certified Rolfer®
880 H St. # 206
Anchorage, AK 99501
(907) 279-9444

February 12, 2017
Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I am a certified Rolfer and have been in private practice for 20 years, 18 of them in Anchorage. I am one of roughly 55 Rolfers/ Structural Integrators practicing in the state. Our group of professionals is in consensus that the current statutory language relating to our exemption should remain intact. The changes proposed in HB110 take the radical step of repealing our exemption in statute and placing it in regulations under the Alaska Board of Massage Therapists.

This is a far cry from what we were told was a simple registration to verify credentials. What it does is take away our status currently protected by law and place us under the board's authority, essentially regulating us. The board would gain the power to alter the language around definitions of qualification for exemption with a simple vote. I am sure you understand why we cannot tolerate this loss of protection. Even if we could count on the good intentions of the current board, we have no idea how future boards might treat us. It is simply unacceptable especially considering that there is no evidence that any of the exempt professions have been implicated in prostitution or human trafficking, which is the stated purpose of the proposed changes. Unless a compromise can be reached in which our exemption language remains in statute and not in regulations, we will have no choice but to oppose passage of HB110 in its entirety. Part of that compromise would be changing the word "may" to "shall" on page 3, line 10 of HB110 which currently reads **Sec. 08.61.085. Application for an exemption. (a) The board may issue.**

Additionally, what is touted as a simple registration process would potentially put practitioners out of work while they scramble to meet new requirements. The language is changed from
HB328 section 08.61.080 (10) person engaged only in the practice of structural integration for
1 restoring postural balance and functional ease by integrating the body in gravity using
2 a system of fascial manipulation and awareness who has graduated from a program or
3 is a current member of an organization recognized by the International Association of
4 Structural Integrators, including the Rolf Institute of Structural Integration

to the new definition under **HB110 Section 08.61.085 (3)(B) (B) is engaged only in the practice of structural integration and**
19 holds a current certified professional membership from the International
20 Association of Structural Integrators or is certified by the Rolf Institute of
21 Structural Integration;

This change may seem minor until closely examined. What it does is force Structural Integration practitioners who are not graduates of the Rolf Institute, some with decades of service to Alaskans, to join the International Association of Structural Integrators (IASI) in order to qualify for exemption. This is no easy task for some. Legacy practitioners deserve to be honored and protected, not pushed into noncompliance.

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with national associations American Massage Therapist Association (AMTA) and the Associated Bodywork and Massage Professionals (ABMP) – the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

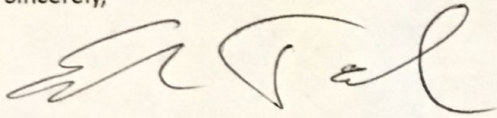
1. It is important to clarify that Rolfing is a distinctly different profession and is not massage therapy. Rolfing®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual assessment of the connective tissue matrix as well as visual assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction.
2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Rolfing or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.
4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists.

Thank you for your consideration of these important issues as you move forward with your committee process. The official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations (Federation MBS) since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at 907.244-8404.

Sincerely,

A handwritten signature in black ink, appearing to read 'E Toal', with a stylized, flowing script.

Edward Toal, Certified Rolfer

Cc: House Labor and Commerce Committee, House Finance Committee

Feb. 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,
Re: House Bill 110

I practice Rolfing Structural Integration in Naknek, Alaska. I am one of about 55 practitioners in this state, and I hope that the current statutory language relating to our exemption will remain. HB110 removes our exemption and puts us at the mercy of the Board of Massage Therapists who can change their regulations at any time. This type of regulation has made it very difficult for SI people to practice in states like New York where SI practitioners with extensive training and experience are required to take lengthy trainings at their massage schools if they wish to practice.

I live in bush Alaska. It took me 9 years and lots of money and airline tickets to complete the Basic Training, Continuing Education, and Advanced Training required by the Rolf Institute. Please let us have our exemption written in law.

Rolfing is not massage therapy. It is not about relaxation, circulation, and oils. It is based on Osteopathic manipulation and Dr. Rolf's to help us relate better to gravity. Assessment of movement and structure guide us to help our clients find the blueprint they were born with, regain the adaptability they lose with modern living, and find permanent change and body awareness.

The Rolf Institute sues massage therapists who say they are Rolfers. If our exemption is removed, what happens to Rolfers who do not agree to register as a massage therapist?

Sincerely, Ann Shankle 907-246-7003

C.c. House Labor and Commerce Committee, House Finance Committee

February 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508



Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I practice Roling Structural Integration in Anchorage Alaska and I am also the owner of Studio One Inc and Spine and Joint Rehabilitation Associates of Alaska. I employ 6 Rolfers and I am one of roughly 55 Rolfers/ Structural Integrators practicing in the state. Our group of professionals is in consensus that the current statutory language relating to our exemption should remain intact.

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with national associations American Massage Therapist Association (AMTA) and the Association of Bodywork and Massage Professionals. Professionals (ABMP) - the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

1. It is important to clarify that Roling is a distinctly different profession and is not massage therapy. Roling®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual assessment of the connective tissue matrix as well as visual assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction.
2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Roling or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.
4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It

appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists.

Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of the The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at 907-230-4645

Sincerely, .

A handwritten signature in black ink, appearing to read "Paul Van Alstine", with a long horizontal line extending to the right.

Paul Van Alstine

Cc: House Labor and Commerce Committee, House Finance Committee

February 12, 2017

Dear Senator Kito,

I'm an Advanced Certified Rolfer with 20 plus years of experience. You will find many letters coming to you from Rolfers with at least that many years in the profession. I am citing this fact because you will not find this same level of longevity in the massage profession. The typical career span for a massage therapist is five years. For Rolfers it's 20 years plus...

This is one of the few ways that I can point out without many hours of discussion about how our work is different. It's difficult to tell the difference between a poet, a legislator, or a university professor. They all sit at a desk & type or write... this is the problem with this proposed legislation...

Structural Integration & Rolfing are very different from massage. They are as different as legal writing is from poetry. Structural integration should not be regulated in any way by massage therapists.

Thanks -

Paul Van Alstine



February 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I practice Rolfing Structural Integration in Anchorage Alaska at Studio One Pilates. I am one of roughly 55 Rolfers/Structural Integrators practicing in the state. Our group of professionals is in consensus that the current statutory language relating to our exemption should remain intact.

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with national associations American Massage Therapist Association (AMTA) and the Association of Bodywork and Massage Professionals. Professionals (ABMP) - the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

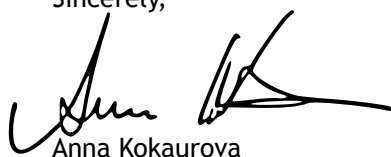
1. It is important to clarify that Rolfing is a distinctly different profession and is not massage therapy. Rolfing®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual assessment of the connective tissue matrix as well as visual assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction.
2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Rolfing or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.
4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists.

Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of the The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at 907-230-1863

Sincerely,

A handwritten signature in black ink, appearing to read 'Anna Kokaurova', with a stylized flourish extending to the right.

Cc: House Labor and Commerce Committee, House Finance Committee

February 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I am currently attending the Rolf School of Structural Integration in Boulder, CO and will graduate with my certification this coming July. My plan is to set up a practice in the Kenai/Soldotna area following my graduation this summer. I am one of roughly 55 Rolfers/Structural Integrators practicing in the state. Our group of professionals is in consensus that the current statutory language relating to our exemption should remain intact.

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with national associations American Massage Therapist Association (AMTA) and the Alaska Body Massage Professionals (ABMP) – the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

1. It is important to clarify that Rolfing is a distinctly different profession and is not massage therapy. Rolfing®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual assessment of the connective tissue matrix as well as visual assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction.
2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Rolfing or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.
4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have

concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists.

Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of the The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at (907-953-9901).

Sincerely,

Ryan Rice

Cc: House Labor and Commerce Committee, House Finance Committee

Linda C. Jordan, M.Sc.

CERTIFIED ADVANCED ROLFER®

February 12/17

Representative Sam Kito,
State Capitol Room 403,
Juneau, AK, 99508

I am writing to express my deep concerns with HB110. I have had a Rolwing® Structural Integration practice in Anchorage AK for 35 years, during which time the Structural Integration profession has grown rapidly across the state.

In 2014 HB328 was passed, specifically exempting Structural Integration practitioners, and those of several other alternative health care specialties, from regulation by the state massage board. Many individuals from varied fields and national organizations worked long and hard crafting that bill because they recognized that Structural Integration is a completely different therapeutic technique than massage (as is reflexology etc). I attended a year long massage therapy program as one prerequisite for admission to Rolwing® Structural Integration training, so I am quite familiar with both professions; nor is there any confusion in the minds of our clients as to the distinct differences and uses thereof.

Unfortunately HB110 is confusing in its apparent proposal to remove only certain professional exemptions, but not others, from massage board regulation; and this with no reason given nor any specifics about implementation. I understand that the massage profession and the FBI have had some worry about sex trafficking under the guise of massage, however Structural Integration has never been implicated. If the massage board has a specific problem that they are trying to address by removing certain exemptions, it has certainly not been communicated to us, despite many requests for information and attempts to understand.

I fail to see how removing particular professional legal exemptions serves the public interest. It is also excessive and unnecessary bureaucracy that will place unfair burdens on some professions (but not others) by putting them under the unspecified control of a board who worked to establish their legal exemptions in the first place.

By poll, the majority of the near 60 Structural Integration practitioners across Alaska also share this viewpoint and objection to HB110.

Thank you,
Linda Jordan



anchoragerolfer.info

P. O. Box 240352
Anchorage, Alaska 99524
(907) 272-6147

HUTTON ROLFING, Inc.

Certified Advanced Rolfing/Structural Integration & Advanced Laser Therapy

MARK I. HUTTON

35021 Kenai Spur Hwy (clinic location)

36765 Jim Dahler Road (mailing address)

Soldotna, AK 99669

907-260-1914

www.markhuttonrolfing.com

February 12, 2017

Representative Sam Kito
State Capital, Room 403
Juneau, Alaska 99508

Dear Representative Kito:

RE: House Bill 110

My name is Mark Hutton and I am writing this letter to identify concerns with the current version of HB110. I have had a Rolfing/Structural Integration practice in Soldotna (Hutton Rolfing, Inc.) for the past twenty years. I am one of roughly 55 Rolfers/Structural Integrators practicing in the state and one of ten that practice on the Kenai Peninsula—which represents the most number of Rolfers per capita of any place in the world. **Our collective group of professionals is in consensus that the current statutory language relating to our exemption should remain intact.**

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy of these were based on agreements with two national associations: the American Massage Therapist Association (AMTA) and the Association of Bodywork & Massage Professionals (ABMP)—the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you consider the legislation.

1. It is important to clarify that Rolfing is a distinctly different profession and is not massage therapy. Rolfing®, also known as Structural Integration, is sometimes mistakenly confused with massage therapy, but it is entirely different. Structural Integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual and orthopaedic assessment of the soft tissue/connective tissue matrix strain and malalignment patterns, the neurophysiology (neurologic command and control) of systems regulation as well as osteopathic visceral manipulation, low level cold laser therapy, and visual and kinetic assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. For example I have a Master's and Bachelor's degree from Oregon State University plus five years of post-graduate studies. The existing statutory language recognizes the importance of this distinction.

2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have attended the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create, through legislation, a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in strong opposition to any changes in the current statute and regulations regarding our exemption language. There is no evidence of Rolfing or Structural Integration establishments ever used as a front for sex trafficking as perceived in massage therapy. We would like to understand how the repeal of the current statute of regulations is relevant to a problem that does not exist.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.
4. There are serious questions about proposed enforcement of the repeal of the exemption. It goes against every legal and business principle to appoint one industry to have regulatory authority over another industry. We are concerned because Rolfers and Structural Integrators are not massage therapists. There are no circumstances where a separate industry should be granted oversight and regulatory authority over a separate and distinct profession.

Thank you for your consideration of these important issues as you move forward with your committee process. Please know that in the strongest possible language the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of the Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaska students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at 907-252-4621.

Sincerely,

Mark Hutton
Certified Advanced Rolfer

Cc: House Labor and Commerce Committee, House Finance Committee

Signature: Mark Hutton
Mark Hutton (Feb 13, 2017)

Email: denali@ddaalaska.com

Signature:

Email: chelsea@ddaalaska.com

Shawn DeFord
PO Box 111433
Anchorage
Alaska 99511

February 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I am currently a student at the Rolf Institute of Structural Integration in Colorado. I will be graduating from the school in June 2017 and will be working in Anchorage Alaska as a Rolfer. Our group of professionals is in consensus that the current statutory language relating to our exemption should remain intact.

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with national associations American Massage Therapist Association (AMTA) and the Association of Bodywork and Massage Professionals (ABMP) – the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

1. It is important to clarify that Rolfing is a distinctly different profession and is not massage therapy. Rolfing®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual assessment of the connective tissue matrix as well as visual assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction.
2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Rolfing or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.

4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists.

Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of the The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at (907) 229 6182.

Sincerely,



Shawn DeFord

Cc: House Labor and Commerce Committee, House Finance Committee

Marnie DeFord
1345 W 9th Ave
Suite 202
Anchorage
Alaska 99501

February 12, 2017

Representative Sam Kito
State Capitol Room 403
Juneau, Alaska 99508

Dear Representative Kito,

Re: House Bill 110

I am writing this letter to identify concerns with the current version of HB110. I have my own Rolfing/Structural Integration practice in Anchorage: DeFord Rolfing, 1345 W 9th Ave, Suite 202, Anchorage, Alaska, 99501. I am one of roughly 55 Rolfers/Structural Integrators practicing in the state. Our group of professionals is in consensus that the current statutory language relating to our exemption should remain intact.

In 2013-14, many of us worked diligently with key stakeholders and bill sponsors to agree on this language, most noteworthy these were based on agreements with national associations American Massage Therapist Association (AMTA) and the Association of Bodywork and Massage Professionals (ABMP) – the primary advocates for massage licensing legislation, HB328 which passed in 2014. In review of the first draft of HB110, the language appears to reverse these agreements, and I offer the following points to consider as you move forward with the legislation.

1. It is important to clarify that Rolfing is a distinctly different profession and is not massage therapy. Rolfing®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a system of manual therapy and movement education designed to improve biomechanical function. This is achieved by a combination of manual assessment of the connective tissue matrix as well as visual assessment of postural and movement patterns. It is a highly effective approach that encourages each individual client's body to become more efficient, resilient and optimally balanced. The underlying theories are unique, and practitioners require extensive education and practice in order to produce sustainable structural change. The existing statutory language recognizes the importance of this distinction.
2. The intent of HB110 is not clear as it relates to exemptions in current statute. We have participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments as a way to pursue sex trafficking establishments. We do not understand why our exemption language has become a focus, and what problem revisiting this language attempts to solve. We have provided testimony throughout the process in opposition of revisiting our exemption language. There is no evidence of Rolfing or Structural Integration establishments ever used as a front for sex trafficking. We would like clarification on the problem revisiting our exemption attempts to solve.
3. It does not appear that all exemptions are being revisited. We would like more information about the reasoning behind revisiting some exemptions over others. We support maintaining our exemption, and while we cannot speak for other groups, after working together in establishing exemption language leading up to passage of HB328, we suspect others would want to retain their exemption as well.

4. There are questions about how enforcement would be implemented with the existing language. What would the consequences be if a Rolfer or Structural Integrator did not register? It appears the State Board of Massage Therapists would oversee the enforcement, however it isn't clear how this would be implemented. We have concerns about enforcement of our profession by another profession. Rolfers and Structural Integrators are not massage therapists.

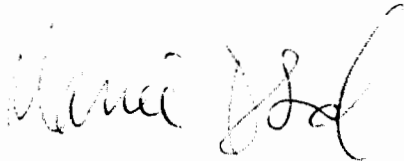
Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory framework for Massage Therapists, because they are not massage therapists, they are Rolfers and Structural Integrators. This continues to be consistent with the nationally agreed upon exemption for Rolfing (and other Structural Integration professionals) between members of the The Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations since 1991.

There are presently approximately 55 Structural Integration practitioners in Alaska including Certified Rolfers and there are 7 Alaskan students at various stages of study at the Rolf Institute in Colorado who will soon join our ranks.

Any questions can be directed to me at (907) 229 4422.

Sincerely,

Marnie DeFord



Cc: House Labor and Commerce Committee, House Finance Committee

February 15, 2017

Re: HB 110

Dear Chair Sito and Members of the House Labor and Commerce Committee:

We are writing on behalf of the Feldenkrais Guild of North America (FGNA) in opposition to HB 110 as currently written. We request that HB 110 be amended to preserve the exceptions currently in statute at AS 08.61.080(11).

The Feldenkrais Guild has developed and enforced accreditation and certification standards for the Feldenkrais Method® profession since 1977. Feldenkrais teachers must graduate from accredited Feldenkrais training programs, be certified by FGNA, fulfill requirements for annual certification renewal, and adhere to FGNA Code of Professional Conduct and Standards of Practice. As defined in the Feldenkrais Method Standards of Practice, the Feldenkrais Method is an educational system and is not massage. Please see Appendix 1 for further information.

Feldenkrais® teachers are now exempt from massage therapy licensing requirements in Alaska. If HB 110 became law, the massage board would have the authority to establish standards and requirements for Feldenkrais teachers applying for an exemption. However, massage board members do not have the knowledge or expertise to make such determinations.

In order to protect the right of Feldenkrais teachers to practice the profession in which they are trained, and to assure public access to their services, the exemption requirements for Feldenkrais teachers should be included in the statute itself, where they cannot be changed without due process.

It is essential that stakeholders be consulted and involved in development of regulations that will affect their right to practice their profession and earn their livelihood. Unfortunately, none of our members were informed of the proposed changes during the development of this bill.

We strongly recommend that HB 110 be amended by striking the proposed addition of AS 08.61.085, and revising AS 08.61.080 by replacing subsections (7), (10), and (11) as shown below. We also support exemption language that has been endorsed by members of the Federation of Therapeutic Massage, Bodywork and Somatic Practice Organizations, which you will find in Appendix 2.

Proposed revision to AS 08.61.080:

This chapter does not apply to a person who (____.1):

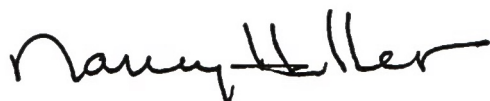
- (A) Does not claim expressly or implicitly to be a massage therapist;
- (B) Limits their work to one or more of the following practices:

- (i) Using touch, words and directed movement to deepen awareness of existing patterns of movement and suggest new possibilities of movement;
 - (ii) Using minimal touch over specific points on the body to facilitate balance in the nervous system;
 - (iii) Using touch to affect the energy systems or channels of energy of the body; or
 - (iv) Using touch to effect change in the structure of the body while engaged in the practice of Structural Integration
- (C) Is recognized by a professional organization or credentialing agency that:
- (i) Requires a minimum level of training, demonstration of competence and adherence to an approved scope of practice and ethical standards; and
 - (ii) Maintains disciplinary procedures to ensure adherence to the requirements of the organization or agency; and
- (D) Provides contact information in the person's place of business for any organization or agency that has recognized the practitioner.
- (__.2) The Board of Massage Therapists has the authority to verify that a practitioner claiming to be exempt from application of AS 08.61 under subsection (10) of this section is certified by a professional organization or credentialing agency as required by subsection (__.1)(C) of this section.

In this document we have included further information about the Feldenkrais Method, and information about states where the practice of the Feldenkrais Method is exempt from massage therapy statutes.

Thank you for considering our request that HB 110 be amended, and that it not be passed in its current form.

Sincerely,



Nancy Haller, FGNA President
fgnapres@gmail.com



Andrea Wiener, FGNA Government Relations Administrator
andrea.wiener@feldenkraigslist.com
781.557.8276

Attached:

- Appendix 1: About the Feldenkrais Method of somatic education
- Appendix 2: Additional sample exemption language
- Appendix 3: Regulatory status of the Feldenkrais Method® of somatic education

APPENDIX 1: About the Feldenkrais Method® of somatic education

The Feldenkrais Method is a learning process that has been shown to have therapeutic benefits, and is not a massage or bodywork technique.

The Feldenkrais Method uses movement and attention to bring about increased awareness and improved functioning through learning. Feldenkrais® teachers help their students become aware of existing patterns of action, and guide the discovery of additional possibilities for action. The Feldenkrais Method facilitates recovery of movement, improves skills for athletes, dancers and musicians, and enhances the ability to learn.

When used in a Feldenkrais lesson, touch is one element of the learning process. Many Feldenkrais lessons do not involve touch at all. In lessons that do involve touch, the student is clothed and the intent of the touch is to promote learning. Like many forms of instruction that include some element of touch—for example, golf or music instruction—the touch is gentle, non-invasive, and non-corrective.

Certified Feldenkrais® teachers complete 800 hours of specialized training over a 3 to 4 year period. Training programs must be accredited by FGNA, and staff must be certified by FGNA.

The Feldenkrais Guild has developed and enforced accreditation and certification standards for the Feldenkrais Method profession since 1977. In the US and Canada, Feldenkrais teachers must graduate from accredited Feldenkrais training programs, be certified by FGNA, fulfill requirements for annual certification renewal, and adhere to FGNA Code of Professional Conduct and Standards of Practice.

APPENDIX 2: Additional sample exemption language

The following suggested exemptions are from the Federation of Therapeutic Massage, Bodywork, and Somatic Practice Organizations legislative packet: <http://federationmbs.org/LegPak-12-2010.pdf>

Suggested Movement Practices Exemption

Nothing in this Article shall be construed to prevent or restrict the practice of any person in this state who uses touch, words and directed movement to deepen awareness of existing patterns of movement in the body as well as to suggest new possibilities of movement while engaged within the scope of practice of a profession with established standards and ethics, provided that their services are not designated or implied to be massage or massage therapy.

Such practices include, but are not limited to the Feldenkrais Method of somatic education, the Rolf Institute's Rolf Movement Integration, the Trager Approach to movement education, and Body-Mind Centering. **Practitioners must be recognized by or meet the established standards of either a professional organization or credentialing agency that represents or certifies the respective practice based on a minimal level of training, demonstration of competency, and adherence to ethical standards.** [emphasis added]

Additional options offered by Feldenkrais Guild of North America:

In Oregon, at the request of the Oregon Board of Massage Therapists, the exemptions also include:

1. Requirement that exempt practitioners provide contact information in the practitioner's place of business for any organization or agency that has certified the practitioner; and
2. Provision that the State Board of Massage Therapists have the authority to verify that a practitioner claiming to be exempt from application of Section [XX] of this Act is certified by a professional organization or credentialing agency as required by subsection [XX] of this section.

FGNA also supports exemptions for professions represented by other Federation MBS members:

Suggested Energy Practices Exemption

Nothing in this Article shall be construed to prevent or restrict the practice of any person in this state who uses touch to affect the energy systems, acupoints or Qi meridians (channels of energy) of the human body while engaged within the scope of practice of a profession with established standards and ethics, provided that their services are not designated or implied to be massage or massage therapy.

Such practices include, but are not limited to Acupressure, Asian Bodywork Therapy, Jin Shin Do® Bodymind Acupressure®, Polarity, Polarity Therapy, and Polarity Therapy Bodywork, Qigong, Reiki, Shiatsu and Tuina. **Practitioners must be recognized by or meet the established standards of either a professional organization or credentialing body that represents or certifies the respective practice based on a minimal level of training, demonstration of competency, and adherence to ethical standards.** [emphasis added] If the terms Bodywork, Bodyworker or Bodywork Therapist are to be protected titles under a proposed law, then the following statement must be added to the

exemption clause: “These exempt practitioners are also allowed to use the terms ‘Bodywork,’ ‘Bodyworker’ and ‘Bodywork Therapist’ in their promotional materials.”

Suggested Structural Integration Exemption:

1. Nothing in this [article/ordinance/bill/regulation – as appropriate] shall be construed to prevent, limit or restrict the practice of any person who uses touch to effect change in the structure of the body while engaged in the practice of Structural Integration, provided that:
 - a. the person’s services are not designated as or implied to be massage or massage therapy; and
 - b. **the person is recognized by or meets the established standards of either a professional organization or credentialing body that acknowledges or certifies practitioners of Structural Integration based on a minimum level of training, demonstration of competence, and adherence to established ethical standards.**[emphasis added]
2. Exempt persons under [section] 1 include, but are not limited to, practitioners of Rolfing® Structural Integration, the Rolf Method of Structural Integration and Hellerwork®.

APPENDIX 3: Regulatory status of the Feldenkrais Method® of somatic education

Below is a list of some states where the Feldenkrais Method has been exempted or excluded from massage therapy licensing requirements. The Feldenkrais Method is not explicitly included in massage therapy or bodywork licensing requirements in any state, except in reference to exclusion or exemption.

Exemption and Exclusion from State Regulation

Alaska

Alaska exempts persons “using only light touch, words, and directed movement to deepen awareness of existing patterns of movement in the body as well as to suggest new possibilities of movement or to affect the energy systems.” (AS 08.61.080(11))

Delaware

Delaware excludes from regulation “Actions by any person engaged in an occupation which does not require a certificate or certification, including, but not limited to, physical education teachers, athletic coaches, health or recreation directors, instructors at health clubs or spas, martial arts, water safety and dance instructors, or coaches, who is acting within the scope of activity for which such person is trained” (DE Code Ann. tit. 24 § 5307(d)(2))

Georgia

The Georgia statute exempts the Feldenkrais Method as follows: "Nothing in this chapter shall be construed to affect, restrict, or prevent the practice, services, or activities of . . . [a] person who uses touch, words, and directed movement to deepen awareness of existing patterns of movement in the body as well as to suggest new possibilities of movement while engaged within the scope of practice of a profession with established standards and ethics, provided that his or her services are not designated or implied to be massage or massage therapy." (GA Code Ann. § 43-24A-3)

Idaho

The Idaho statute exempts “the practice of any person in this state who uses touch, words and directed movement to deepen awareness of existing patterns of movement in the body as well as to suggest new possibilities of movement while engaged within the scope of practice of a profession, provided that their services are not designated or implied to be massage or massage therapy. Such practices include, but are not limited to, the Feldenkrais method® of somatic education, the Trager approach® to movement education, body-mind centering®, Ortho-Bionomy® and craniosacral therapy. (ID 54:4003(2)(e))

Illinois

The Illinois statute excludes from its definition of massage "those acts of...therapeutic or corrective measures that are outside the scope of massage therapy practice..." (225 IL Comp. Stat. 225/10)

The Feldenkrais Method is expressly exempted: "Nothing in this Act prohibits practitioners that do not involve intentional soft tissue manipulation, including . . . Feldenkrais . . . from practicing." (225 IL Comp. Stat. 225/25(e))

Kentucky

The Kentucky statute exempts the Feldenkrais Method: "Persons who use procedures within the scope of practice of their profession, which has established standards and ethics, provided that their services use touch, words, and directed movement to deepen awareness of existing patterns of movement in the body as well as to suggest new possibilities of movement...but who are not designated or implied to administer massage or to be massage therapists. These practices include...*the Feldenkrais Method*..." (KY Rev. Stat. Ann. § 309.352(5))

Massachusetts

The Massachusetts statute exempts the Feldenkrais Method: Chapter 112 Section 228. (b) exempts...the practice of a person who uses touch, words or directed movement to deepen awareness of patterns of movement in the body..." and goes on to explicitly state what is meant by this phrase by identifying that "Such practices shall include...the Feldenkrais Method..." (MA Gen. Laws Ch. 112 § 228(b))

Missouri

Missouri exempts in statute practitioners "who use touch and words to deepen awareness of existing patterns of movement in the human body as well as to suggest new possibilities of movement." (1998 MO. Laws 324.265.7(3))

New Jersey

The New Jersey statute specifically excludes interpretations which could be "construed to prohibit any person from using touch, words and directed movement to deepen awareness of existing patterns of movement in the body, or to suggest new possibilities of movement provided that these services are not designated or implied to be massage and bodywork therapy and the client is fully clothed." (No. 4455, Pub. L. No. 2007 c. 337, as approved 1/13/2008.)

New Mexico

The New Mexico statute exempts the Feldenkrais Method: "Nothing in the Massage Therapy Practice Act shall be construed to prevent...practitioners of...Feldenkrais method...from practicing those skills." (N.M. Stat. Ann. § 61-12C-5.1(D))

New York

The New York State Board for Massage Therapy and the State Education Department ruling stated that Massage Board, as well as the Board for Physical Therapy, found, after a thorough review, that "*the Feldenkrais Method*, as currently practiced, and demonstrated at the meeting of the Board for Massage Therapy on June 26, 2000, does not fall within the scope of practice of massage therapy."

North Carolina

The North Carolina statute exempts "The practice of movement educators such as dance therapists or teachers, yoga teachers, personal trainers, martial arts instructors, movement repatterning practitioners, and other such professions." (N.C. Gen. Stat. § 90-624(6))

Washington

In statute and rules, Washington exempts individuals "who have completed a somatic education training program approved by the secretary." Requirements for practices to fall under the definition were subsequently defined. Training programs in the Feldenkrais Method meet those requirements. (WA Rev. Code Ann. tit. 18, § 18.108.050)

The Feldenkrais Method is also excluded from massage therapy regulation in Arizona, Colorado, Delaware, Iowa, Maine, Michigan, Minnesota, Montana, New Hampshire, Oklahoma, Oregon, Pennsylvania, Rhode Island, Virginia and Wisconsin. Massage therapy is not regulated in Kansas, Minnesota, Vermont and Wyoming.

Crystal Koeneman

From: Angela Stephi
Sent: Wednesday, February 15, 2017 12:10 PM
To: Crystal Koeneman
Subject: FW: HB 110

From: Christine Issel [mailto:christinec.issel@gmail.com]
Sent: Wednesday, February 15, 2017 8:59 AM
To: Rep. Colleen Sullivan-Leonard <Rep.Colleen.Sullivan-Leonard@akleg.gov>
Subject: HB 110

Dear Representative Sullivan-Leonard:

While it is readily admitted that human trafficking is a problem, changes to the exemption for reflexologists appears to penalize the legitimate reflexology practitioner. I question the change to force registration, allowing the state to set our standards without our input, why registration for 10 years, and is the fee to be set by the state a one time cost or an annual fee? It would help if this is clarified in the proposed bill.

Licensing massage establishments and their owners, and changing tightening zoning laws, which is the approach in most states, appears to assist law enforcement the most efficient way of dealing with the issue of human trafficking.

What is being suggested is a thinly veiled attempt by the massage industry to take over reflexology and other exempted practices by penalizes the legitimate practitioner.

Please vote no on HB 110.

Christine Issel

American Reflexology Certification Board

Legislative Consultant

GARY KNOPP - 907-283-2690
SAM KITO III - 907-465-4748 * COMMITTEE CHAIR

From: AC Anderson rockinga@gci.net

Subject: Fwd: Opposition to HB110 (Please forward to Mike Chennault & Sam Kito)

Date: Feb 15, 2017, 4:56:47 AM

To: AC Anderson rockinga@gci.net

From: AC Anderson <rockinga@gci.net>

Date: February 13, 2017 at 5:36:33 PM AKST

To: ^{blumer}dianne.bloomer@akleg.gov

Cc: AC Anderson <rockinga@gci.net>

Subject: Opposition to HB110 (Please forward to Mike Chennault & Sam Kito)

Hello, my name is Amy Anderson. I'm a resident of Cooper Landing Alaska, District 29.

I'm writing you in regard to HB 110.

I am a consumer of Rolwing and massage and am well aware of the extreme differences in these therapies.

Rolwing and massage are two distinctly different professions.

The bureaucratic over reach of HB 110 is appalling and it is a totally unnecessary regulation.

I am adamantly opposed to HB 110.

PLEASE relay my message ASAP and prior to the HB 110 conference scheduled Wednesday February 15th 2017.

Thank You!

Sent from my iPad

From: AC Anderson rockinga@gci.net
Subject: Fwd: Opposition to HB110 (Please forward to Mike Chennault & Sam Kito)
Date: Feb 15, 2017, 4:55:44 AM
To: AC Anderson rockinga@gci.net

From: AC Anderson <rockinga@gci.net>
Date: February 13, 2017 at 5:39:00 PM AKST
To: dianne.bloomer@akleg.gov
Cc: AC Anderson <rockinga@gci.net>
Subject: Fwd: Opposition to HB110 (Please forward to Mike Chennault & Sam Kito)

Sent from my iPad

Subject: Opposition to HB110 (Please forward to Mike Chennault & Sam Kito)

Hello, my name is Roger Anderson. I'm a resident of Cooper Landing Alaska, District 29.

I'm writing you in regard to HB 110.

I am a consumer of Rolwing and massage and am well aware of the extreme differences in these therapies.

Rolwing and massage are two distinctly different professions.

The bureaucratic over reach of HB 110 is appalling and it is a totally unnecessary regulation.

I am adamantly opposed to HB 110.

PLEASE relay my message ASAP and prior to the HB 110 conference scheduled Wednesday February 15th 2017.

Thank You!