

**HB**

**1 10**

<TARGET><BILL>HB 110</BILL><SUBJECT>HB  
110</SUBJECT><COMM>HL&C30</COMM></TARGET>



# Representative Sam Kito

## Alaska State Legislature

### House District 33

#### Downtown Juneau

Douglas  
Haines  
Klukwan  
Skagway  
Gustavus

Excursion Inlet

#### Chair

House Labor &  
Commerce

#### Chair

Legislative Council

#### Member

House Health &  
Social Services

#### Member

House Rules

### Contact

Rep. Sam Kito  
Alaska State Capitol 403  
120 4<sup>th</sup> St  
Juneau, AK 99801

907-465-4766

Rep.Sam.Kito@akleg.gov

### House Bill 110

#### Sponsor Statement

*"An Act relating to the practice of massage therapy; relating to the Board of Massage Therapists; and providing for an effective date."*

The Board of Massage Therapists has requested several changes to their statutes to allow for the better protection of Alaskans.

House Bill 110 seeks to add language for the board to adopt regulations governing massage therapy establishments; increases the number of hours of in-class supervised instruction and clinical work from an approved massage school from 500 hours to 625 hours; reduces the number of hours of safety education covering blood-borne pathogens from four hours to two hours; and allows the board to issue an exemption from the licensure requirements of this chapter to persons who submit an application, pay a registration fee, and submits proof that the person meet the requirements. Exemptions authorized under this section are valid for 10 years or until the person's scope of practice changes. Exemptions may be renewed.

The Board was contacted by the FBI and the Municipality of Anchorage in the first year of licensing concerning Human/Sex Trafficking in the state of Alaska. In Anchorage in 2015 alone, 29 establishments were identified as posing as Massage Establishments where illicit business was being conducted. The board has moved to create statute changes that target these type of businesses and to close loopholes.

Exemption registrations are being created in order to combat the ability for business owners to avoid being contacted by state investigations and federal agencies. With the tightening of the statute, it gives the investigation agencies the increased ability to enter a business and require the owner to show paperwork proving the licensing of each therapist or exemption. The statute changes will help clarify board intent and assist state and federal agencies in their pursuit of decreasing Human Trafficking.

I urge your support of House Bill 110 to strengthen our laws to protect Alaskans.

**CS FOR HOUSE BILL NO. 110(L&C)**

IN THE LEGISLATURE OF THE STATE OF ALASKA

THIRTIETH LEGISLATURE - SECOND SESSION

BY THE HOUSE LABOR AND COMMERCE COMMITTEE

Offered:  
Referred:

Sponsor(s): REPRESENTATIVE KITO

**A BILL**

**FOR AN ACT ENTITLED**

1 **"An Act relating to the Board of Massage Therapists; relating to the practice of massage**  
2 **therapy; relating to massage therapy establishments; relating to the Department of**  
3 **Commerce, Community, and Economic Development; and providing for an effective**  
4 **date."**

5 **BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:**

6 \* **Section 1.** AS 08.61.010 is amended to read:

7 **Sec. 08.61.010. Board established.** The Board of Massage Therapists is  
8 established in the department. The board consists of five members appointed by the  
9 governor as follows:

10 (1) four licensed massage therapists who have been engaged in the  
11 practice of massage therapy in the state for the three years immediately preceding  
12 appointment and who shall remain actively engaged in the practice of massage therapy  
13 while serving on the board; not more than one member appointed under this paragraph  
14 may have an ownership or partnership interest in a massage school; and

1 (2) one public member; the governor may not appoint as a public  
2 member

3 (A) a licensed health care provider;

4 (B) an employee of the state; or

5 (C) a current [OR FORMER] member of another occupational  
6 licensing board established under AS 08.

7 \* **Sec. 2.** AS 08.61.020 is amended to read:

8 **Sec. 08.61.020. Duties and powers of board.** In addition to the duties  
9 specified in AS 08.01, the board shall

10 (1) provide for the examination of applicants by the board or through a  
11 nationally recognized competency examination approved by the board and issue  
12 licenses to applicants the board finds qualified;

13 (2) adopt regulations governing

14 (A) licensing of massage therapists; [AND]

15 (B) the practice of massage therapy; **and**

16 **(C) massage therapy establishments;**

17 (3) establish standards of professional competence and ethical conduct  
18 for massage therapists;

19 (4) establish standards for continuing education for massage therapists;  
20 standards adopted by the board under this paragraph must allow for approval of  
21 Internet-based continuing education courses;

22 (5) make available to the public a list of massage therapists licensed  
23 under this chapter;

24 (6) determine which states have educational and licensing  
25 requirements equivalent to the requirements of this state;

26 (7) enforce the provisions of this chapter and adopt and enforce  
27 regulations necessary to implement this chapter; and

28 (8) approve one or more nationally recognized competency  
29 examinations and publish and periodically update the list of approved examinations.

30 \* **Sec. 3.** AS 08.61.030 is amended to read:

31 **Sec. 08.61.030. Qualifications for license.** The board shall issue a license to

1 practice massage therapy to a person who

2 (1) applies on a form provided by the department;

3 (2) pays the fees established under AS 08.61.090;

4 (3) furnishes evidence satisfactory to the board that the person has  
5 completed a

6 (A) course of study of at least 625 [500] hours of in-class  
7 supervised instruction and clinical work from an approved massage school; or

8 (B) board-approved apprenticeship program;

9 (4) is 18 years of age or older;

10 (5) has been fingerprinted and has provided the fees required by the  
11 Department of Public Safety under AS 12.62.160 for criminal justice information and  
12 a national criminal history record check; the fingerprints and fees shall be forwarded  
13 to the Department of Public Safety to obtain a report of criminal justice information  
14 under AS 12.62 and a national criminal history record check under AS 12.62.400;

15 (6) has a current cardiopulmonary resuscitation certification;

16 (7) has received at least two [FOUR] hours of safety education  
17 covering bloodborne pathogens and universal precautions in the two years preceding  
18 the application for the license; in this paragraph, "bloodborne pathogens" has the  
19 meaning given in AS 18.15.450;

20 (8) has successfully completed a nationally recognized competency  
21 examination approved by the board; and

22 (9) has not been convicted of, or pled guilty or no contest to, a crime  
23 involving moral turpitude, or who has been convicted of, or pled guilty or no contest  
24 to, a crime involving moral turpitude if the board finds that the conviction does not  
25 affect the person's ability to practice competently and safely.

26 \* **Sec. 4.** AS 08.61.050 is amended to read:

27 **Sec. 08.61.050. Standards for license renewal.** The board shall renew a  
28 license issued under this chapter to a licensee who

29 (1) pays the required fee;

30 (2) meets the continuing education requirements established by the  
31 board;

1 (3) has not been convicted of, or pled guilty or no contest to, a crime  
2 involving moral turpitude, or has been convicted of, or pled guilty to or no contest to,  
3 a crime involving moral turpitude if the board finds that the conviction does not affect  
4 the person's ability to practice competently and safely;

5 (4) has a current cardiopulmonary resuscitation certification; and

6 (5) has been fingerprinted and has provided the fees required by the  
7 Department of Public Safety under AS 12.62.160 for criminal justice information and  
8 a national criminal history record check at least once every six years; the fingerprints  
9 and fees shall be forwarded to the Department of Public Safety to obtain a report of  
10 criminal justice information under AS 12.62 and a national criminal history record  
11 check under AS 12.62.400.

12 \* **Sec. 5.** The uncodified law of the State of Alaska is amended by adding a new section to  
13 read:

14 **TRANSITION: REGULATIONS.** The Department of Commerce, Community, and  
15 Economic Development and the Board of Massage Therapists may adopt regulations  
16 necessary to implement the changes made by this Act. The regulations take effect under  
17 AS 44.62 (Administrative Procedure Act), but not before the effective date of the law  
18 implemented by the regulation.

19 \* **Sec. 6.** Sections 4 and 5 of this Act take effect immediately under AS 01.10.070(c).

20 \* **Sec. 7.** Except as provided in sec. 6 of this Act, this Act takes effect July 1, 2019.



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### House Bill 110 Sectional Analysis

*"An Act relating to the practice of massage therapy; relating to the Board of Massage Therapists; and providing for an effective date."*

**Section 1: Amends AS 08.61.010. Board established.** Eases the restrictions for those who wish to be public members of the board.

**Section 2: Amends AS 08.61.020. Duties and powers of board.** Includes language allowing the board to adopt regulations governing massage therapy establishments.

**Section 3: Amends AS 08.61.030. Qualifications for license.** Increases the number of hours of in-class supervised instruction and clinical work from an approved massage school from 500 hours to 625 hours and reduces the number of hours of safety education covering bloodborne pathogens from four hours to two hours.

**Section 4: Amends 08.61.050. Standards for license renewal.** Changes the annual fingerprint requirement to every six (6) years

**Section 5:** Amends uncodified law to allow for the Board to adopt regulations necessary to implement this Act. Regulations under this provision take effect on or after the effective date of the bill.

**Section 6:** Establishes an immediate effective date for adopting regulations and the fingerprint requirement.

**Section 7:** Establishes a July 1, 2019 effective date.



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### House Bill 110 Sectional Analysis

*"An Act relating to the practice of massage therapy; relating to the Board of Massage Therapists; and providing for an effective date."*

**Section 1: Amends AS 08.61.020. Duties and powers of board.** Includes language allowing the board to adopt regulations governing massage therapy establishments.

**Section 2: Amends AS 08.61.030. Qualifications for license.** Increases the number of hours of in-class supervised instruction and clinical work from an approved massage school from 500 hours to 625 hours and reduces the number of hours of safety education covering bloodborne pathogens from four hours to two hours.

**Section 3: Amends AS 08.61 to include a new section AS 08.61.085. Application for an exemption.** Allows the board to issue an exemption from the licensure requirements of this chapter to persons who submit an application, pay a registration fee, and submits proof that the person meet the requirements. Exemptions authorized under this section are valid for 10 years or until the person's scope of practice changes. Exemptions may be renewed.

**Section 4: Amends 08.61.090. Fees.** Allows the department to set fees for the application for an exemption or exemption renewal as set out by Section 3.

**Section 5:** Repeals statute language now contained in Section 3.

**Section 6:** Amends uncodified law to allow for the Board to adopt regulations necessary to implement this Act. Regulations under this provision take effect on or after the effective date of the bill.

**Section 7:** Establishes an immediate effective date for adopting regulations

**Section 8:** Establishes a July 1, 2019 effective date.



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### Explanation of Changes House Bill 110 Massage Therapy Licensing Version A to Version U

Version U includes the following changes to HB 110 version A:

- Page 1: New Section 1 – Modifies the language regarding the qualifications for a public member by removing the restriction of being a former member of another occupational licensing board. This change is required to address the Division of Legislative Audit's audit recommendation. According to Boards and Commissions staff, stringent requirements make it difficult to find interested applicants.
- Removes all language regarding an application for exemption for those who are currently in the exception category under AS 08.61.080.
- Page 3-4: New Section 4 – Amends the Standards for License Renewal by changing the annual fingerprint requirement from every renewal cycle to at least once every six years, or every 3 licensing renewals.

# Fiscal Note

State of Alaska  
2017 Legislative Session

Bill Version: HB 110  
Fiscal Note Number: \_\_\_\_\_  
( ) Publish Date: \_\_\_\_\_

Identifier: HB110-DCCED-CBPL-02-10-17  
Title: MESSAGE THERAPY LICENSING; EXEMPTIONS  
Sponsor: KITO  
Requester: (H) LAC

Department: Department of Commerce, Community and  
Economic Development  
Appropriation: Corporations, Business and Professional  
Licensing  
Allocation: Corporations, Business and Professional  
Licensing  
OMB Component Number: 2360

## Expenditures/Revenues

Note: Amounts do not include inflation unless otherwise noted below. (Thousands of Dollars)

	FY2018 Appropriation Requested	Included in Governor's FY2018 Request	Out-Year Cost Estimates					
			FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
<b>OPERATING EXPENDITURES</b>								
Personal Services								
Travel			4.6	4.6	4.6	4.6	4.6	4.6
Services	10.8							
Commodities								
Capital Outlay								
Grants & Benefits								
Miscellaneous								
<b>Total Operating</b>	<b>10.8</b>	<b>0.0</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>

## Fund Source (Operating Only)

1156 Rcpt Svcs (DGF)	10.8		4.6	4.6	4.6	4.6	4.6	4.6
<b>Total</b>	<b>10.8</b>	<b>0.0</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>

## Positions

Full-time								
Part-time								
Temporary								

## Change in Revenues

1156 Rcpt Svcs (DGF)	10.8		4.6	4.6	4.6	4.6	4.6	4.6
<b>Total</b>	<b>10.8</b>	<b>0.0</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>

**Estimated SUPPLEMENTAL (FY2017) cost:** 0.0 (separate supplemental appropriation required)  
(discuss reasons and fund source(s) in analysis section)

**Estimated CAPITAL (FY2018) cost:** 0.0 (separate capital appropriation required)  
(discuss reasons and fund source(s) in analysis section)

## ASSOCIATED REGULATIONS

Does the bill direct, or will the bill result in, regulation changes adopted by your agency? Yes  
If yes, by what date are the regulations to be adopted, amended or repealed? 07/01/19

## Why this fiscal note differs from previous version:

Not applicable, initial version.

Prepared By: Janey Hovenden, Director Phone: (907)465-2538  
Division: Corporations, Business and Professional Licensing Date: 02/10/2017 03:50 PM  
Approved By: Catherine Reardon, Director Date: 02/10/17  
Agency: Division of Administrative Services, DCCED

FISCAL NOTE ANALYSIS

STATE OF ALASKA  
2017 LEGISLATIVE SESSION

BILL NO. HB 110

**Analysis**

HB 110 provides authority for the Board of Massage Therapy to establish a license for massage therapy establishments and to develop regulation for licensing requirements. Regulating massage therapy establishments is intended to facilitate protection to the public from businesses that engage in prostitution, sex trafficking, and the employment of unlicensed persons performing massage therapy type activities.

This bill amends the qualifications for initial licensure to increase the required hours of supervised instruction and clinical work and reduce the number of hours required in safety education covering bloodborne pathogens and universal precautions.

This bill allows the board to issue an 'exemption' from licensure in the same process as it would a license.

If the bill passes the following expenses will be incurred:

Travel: \$4.6 (two trips per year to conduct onsite investigative inspections in out years)

Services: \$10.8 (costs to amend regulations, legal, printing, and postage in the first year)

The potential number of establishments affected by this bill are unknown at this time. Future costs for legal and hearing service expenses in out years are unknown.

Professional licensing programs within the Division of Corporations, Business and Professional Licensing are funded by Receipt Supported Services, fund source 1156 Rcpt Svcs (DGF). Licensing fees for each occupation are set per AS 08.01.065 so the total amount of revenue collected approximately equals the occupation's actual regulatory costs.

# Fiscal Note

State of Alaska  
2018 Legislative Session

Bill Version: HB 110  
Fiscal Note Number: \_\_\_\_\_  
( ) Publish Date: \_\_\_\_\_

Identifier: HB110-DCCED-CBPL-02-09-18  
Title: MESSAGE THERAPY LICENSING; EXEMPTIONS  
Sponsor: KITO  
Requester: (H) Labor & Commerce

Department: Department of Commerce, Community and  
Economic Development  
Appropriation: Corporations, Business and Professional  
Licensing  
Allocation: Corporations, Business and Professional  
Licensing  
OMB Component Number: 2360

**Expenditures/Revenues**

Note: Amounts do not include inflation unless otherwise noted below. (Thousands of Dollars)

	FY2019	Included in	Out-Year Cost Estimates				
	Appropriation Requested	Governor's FY2019 Request	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>OPERATING EXPENDITURES</b>	<b>FY 2019</b>	<b>FY 2019</b>	<b>FY 2020</b>	<b>FY 2021</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
Personal Services							
Travel			4.6	4.6	4.6	4.6	4.6
Services	10.8						
Commodities							
Capital Outlay							
Grants & Benefits							
Miscellaneous							
<b>Total Operating</b>	<b>10.8</b>	<b>0.0</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>

**Fund Source (Operating Only)**

1156 Rcpt Svcs (DGF)	10.8		4.6	4.6	4.6	4.6	4.6
<b>Total</b>	<b>10.8</b>	<b>0.0</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>

**Positions**

Full-time							
Part-time							
Temporary							

**Change in Revenues**

1156 Rcpt Svcs (DGF)	10.8		4.6	4.6	4.6	4.6	4.6
<b>Total</b>	<b>10.8</b>	<b>0.0</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>	<b>4.6</b>

**Estimated SUPPLEMENTAL (FY2018) cost:** 0.0 *(separate supplemental appropriation required)*  
*(discuss reasons and fund source(s) in analysis section)*

**Estimated CAPITAL (FY2019) cost:** 0.0 *(separate capital appropriation required)*  
*(discuss reasons and fund source(s) in analysis section)*

**ASSOCIATED REGULATIONS**

Does the bill direct, or will the bill result in, regulation changes adopted by your agency? Yes  
If yes, by what date are the regulations to be adopted, amended or repealed? 07/01/19

**Why this fiscal note differs from previous version/comments:**

Updated to 2018 form.

Prepared By: <u>Janey McCullough, Director</u>	Phone: <u>(907)465-2538</u>
Division: <u>Corporations, Business and Professional Licensing</u>	Date: <u>02/09/2018</u>
Approved By: <u>Catherine Reardon, Director</u>	Date: <u>02/09/18</u>
Agency: <u>Division of Administrative Services, DCCED</u>	

## FISCAL NOTE ANALYSIS

STATE OF ALASKA  
2018 LEGISLATIVE SESSION

BILL NO. HB 110

### Analysis

HB 110 provides authority for the Board of Massage Therapy to establish a license for massage therapy establishments and to develop regulations for licensing requirements. Regulating massage therapy establishments is intended to facilitate protection of the public from businesses that engage in prostitution, sex trafficking, and the employment of unlicensed persons performing massage-therapy type activities.

This bill amends the qualifications for initial licensure to increase the required hours of supervised instruction and clinical work and reduce the number of hours required in safety education covering bloodborne pathogens and universal precautions.

This bill allows the board to issue an 'exemption' from licensure in response to an application from a person who provides proof their work falls into specific, limited categories.

If the bill passes the following expenses will be incurred:

Travel: \$4.6 (two trips per year to conduct onsite investigative inspections in out years)

Services: \$10.8 (costs to amend regulations including legal, printing and postage in the first year)

The potential number of establishments affected by this bill is unknown at this time. Future costs for legal and hearing service expenses in out years are unknown.

Professional licensing programs within the Division of Corporations, Business and Professional Licensing are funded by Receipt Supported Services, fund source 1156 Rcpt Svcs (DGF). Licensing fees for each occupation are set per AS 08.01.065 so the total amount of revenue collected approximately equals the occupation's actual regulatory costs.



Associated Bodywork & Massage Professionals

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800-458-2267  
fax 800-667-8260  
www.abmp.com

February 14, 2017

TO: Labor and Commerce and Finance Committees  
House of Representatives, State of Alaska

Speaker of the House Edgmon and Honorable Representatives Kito, Wool, Josephson, Stutes, Birch, Knopp, Sullivan-Leonard, Chenault, Edgmon, Foster, Seaton, Gara, Grenn, Guttenberg, Kawasaki, Ortiz, Pruitt, Thompson, Wilson, and Tilton

Associated Bodywork & Massage Professionals (ABMP) is the largest professional association for massage therapists in the country. We provide professional liability insurance, business resources, professional publications, and legislative and regulatory advocacy for our more than 80,000 members nationwide; including more than 300 massage therapy and bodywork members in Alaska.

We are responding to House Bill 110 regarding amendments to the Massage Practice Act. Across the nation, many states are looking at ways to attack human trafficking. Many times we find this effort runs through the Massage Practice Act and legislation regarding alternative modalities. In our opinion, human trafficking should not be targeted at law abiding massage therapists who have complied with all of the requirements to get a license. We encourage states to address human trafficking through their criminal codes, to increase the penalties for pimps and traffickers, and to get help for those engaged in prostitution. We believe that local authorities should have the ability to inspect all businesses to make sure that those who are supposed to have licenses do so. This shouldn't be limited to the massage therapy community. We do applaud your efforts to address human trafficking. We are opposed, however to a few items in House Bill 110.

With regards to requiring the Board to regulate massage therapy establishments in Sec 08.61.020 we believe that the police and local governments should have the authority to inspect all businesses, not just massage therapy businesses, to ensure that all activity at the business is lawful. Establishment licensing creates an added financial and logistical burden on licensed massage therapists who have gone through every requirement of licensure—from obtaining the appropriate amount of education, going through a background check, confirming they have not committed any crimes of moral turpitude, and passing a licensing examination. These individuals are not the criminal elements that the bill purports to address. Having to pay for an additional license to practice massage therapy is an added burden to massage therapists that nationally, on average, make approximately \$25,000 per year.

Amendments to Section 08.61.030 modify licensure requirements for practicing massage therapists in Alaska. The new requirement would require 625 hours of education in order to obtain licensure. We are in favor of the 625 hour education standard. HB 110 however, does not address what other areas of the massage practice act are affected by this move to 625 hours. We strongly encourage you to consider adding some grandfathering language for all who received or applied for their licenses in advance of the potential effective date of the bill. People who met the requirements in advance of this amendment should be able to continue to practice. No grandfathering would create an additional financial burden on practitioners who have already been practicing legally.

In addition, amendments to Section 08.61.030 to modify the education requirement to 625 hours could also have an effect on those individuals who see licensure through credentialing. Sec 08.061.040(9)(A) provides that massage therapists moving into Alaska can in part obtain a license by being "licensed to practice massage therapy in another state or country that has licensing requirements that are substantially equal to or greater than the requirements of this state." A majority (twenty eight) of regulated states use a 500-hour requirement of education for licensure. In addition, eight states require between 500 and 625 hours, two states require voluntary certification and four other states are unregulated.

We ask that you consider removing Sec. 08.061.040(9)(A) from the statute and allow people to move to Alaska and practice so long as they meet the requirements in their original jurisdiction, are in good standing, and have passed a

criminal background check. Absent moving in this direction, we ask that you establish a capacity for regulators to accept a combination of “substantially equivalent” education and work experience as a means to obtaining licensing in Alaska. This will aid current and future Alaska residents in qualifying to practice.

There is also a typographical error at Sec 08.61.030(7). The bill says two hours of safety education, but the number after two is (Four).

Finally, the requirement that exempt modalities would be required to register as exempt in Sec. 08.61.085 is baffling. It is confusing to require individuals to pay to register to not get a license. It is akin to having a person register and pay to not have a driver’s license. If a practice is not regulated, those practitioners should not be required to register and pay an arbitrary fee to not have a license. To require a person to apply, pay fees and submit proof “satisfactory to the board” is subjective and opens the process up to potential abuse targeted at various individuals. Furthermore, the modalities identified in (3) don’t cover all bodywork modalities, so the registry would be incomplete.

In most regulated states, bodywork professionals are not required to obtain a license to practice their profession—a position that most of these professionals support. We believe they will also be opposed to having to pay for a registry to not be licensed. We urge you to talk with the national organizations about their positions, and to hear your bodywork constituents. Not all professions need to be licensed. There are a lot of conversations in the regulatory arena about not over-regulating professions. We know there are bad actors that usurp the names of bodywork professions. That said, trying to root out those individuals by requiring licensing of bodywork professionals is not, in our opinion, the way to get at these actors. We strongly advocate for separating massage and bodywork laws from human trafficking laws. Addressing these issues through the criminal code is how to get to these individuals. Strengthen criminal codes, authorize local governments through the criminal or other governmental codes to investigate when they suspect criminal activity.

The registry is a unique attempt to legislate prostitution and human trafficking through the massage practice act. The board does not have police power to arrest or press charges against an individual engaging in human trafficking. The best a board can do is to issue cease and desist orders for the unlicensed practice of law. Criminal entities will disregard a cease and desist order. If they are engaged in criminal activity a cease and desist order will not deter them.

We strongly encourage the Alaska legislature to remove Sec. 08.61.085, reconsider raising the education requirement for licensure to 625 without reasonable grandfathering and consideration of endorsement candidates and have a deeper conversation about the merits of registering unregulated individuals. Thank you for your consideration. If you have any questions or comments, please contact me at [laura@abmp.com](mailto:laura@abmp.com) or 303 679-7645. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura B. Embleton". The signature is written in black ink and is positioned above the typed name.

Laura B. Embleton, Government Relations Director

**From:** [Siene Allen](#)  
**To:** [Rep. Sam Kito](#)  
**Subject:** House Bill 110 Public Comment  
**Date:** Wednesday, February 15, 2017 3:58:36 AM

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2017 February 14

Dear House Committee Members:

My name is Siene Allen. I graduated from the Florida School of Massage in 2009, passed my boards and became licensed in FL that same year; have been a certified member of the NCBTMB since 2009; and am currently practicing massage therapy in Kodiak with licenses held in MT and AK. My specialty is in orthopedic massage therapy with an emphasis on myofascial balancing.

I write you today because I am concerned that the exemptions proposed in House Bill No. 110 (Sec. 3 AS 08.61.085.) with regards to the practice of structural integration fall outside the legal definition of "practice of massage therapy". Practitioners that specifically "manipulate soft tissues, to enhance the functions of those tissues and promote relaxation and well-being" are defined by House Bill 328 (Sec. 08.61.100.) as massage therapists.

The International Association of Structural Integrators [IASI] defines their practice this way: Structural Integration is a type of bodywork that focuses on the connective tissue, or fascia, of the body. Fascia surrounds muscles, groups of muscles, blood vessels, organs, and nerves, binding some structures together while permitting others to slide smoothly over each other . . . Structural Integration works to lengthen, stretch, and soften this tissue to restore postural balance, ease of movement, and a feeling of being more at home in your own body (IASI, n.d.).

According to their own words, they are practicing massage under House Bill 328 (Sec. 08.61.100.). As such, they should have to follow the same licensure requirements as the rest of us. As a massage therapist who focuses primarily on the myofascial system in my own work, I find it difficult to see how they could qualify for an exemption.

The massage therapy profession is similar to that of a medical provider in that there are many modalities/specialties. A neurologist is not privileged to deliver babies, but their professional license is the same. Structural integration is a specialty massage modality that focuses on how the fascia effects the body as an interconnected system; it is not its own profession no matter how much money is put into lobbying.

Most certification boards (including the NCBTMB, ARCB and IASI) require a renewal every 2-4 years to maintain certification. A 10-year exemption seems excessive by these standards; monitoring changes in status of exempt individuals would likely require a fair amount of administrative work. At the very minimum, anyone who is allowed exemption under the law should be required to reapply for exemption on the same 2-year cycle that massage therapists in the State are required to follow.

I support massage therapy licensure as it establishes scope of practice, provides legal means to enforce professional standards and safeguard the public, and helps prevent illegal activity such as prostitution and human trafficking. Professional licensure also supports the acceptance of and reimbursement for massage therapy services when offered within integrated health care systems as a way to increase value, expand wellness services, and provide better outcomes for patients while managing rising costs. If specialty modalities like structural integration, rolfing, craniosacral therapy, reflexology, etc. want to be included in the integrated health care system it stands to reason that a single professional license for massage therapy and bodywork would be the most logical approach towards recognition and appropriate regulation.

I honestly believe that massage therapy and other complementary services are going to play a

significant role in helping to promote the health and wellness of Alaskans as we continue to reform health care. The comprehensive paper The Value and Efficacy of Massage Therapy in Integrated Health Care (AMTA, 2014) made this statement: "Including massage therapy as part of an integrated care model can help ensure that patients get the appropriate care to manage both the causes and symptoms of poor health, with the goal of improving outcomes" (p. 9). With House Bill 110 (Sec. 3 AS 08.61.085.) before you, your decisions today will have an impact on what the future of health care looks like moving forward for those of us who practice massage and bodywork. I hope that you consider my arguments regarding the need for structural integrators to apply for a massage license like the rest of us, and limit other license exemptions to 2 years.

Thank your for your consideration,

Siene Allen

#### References

- American Massage Therapy Association. (2014). The value and efficacy of massage therapy in integrated health care. Retrieved from [https://www.amtamassage.org/uploads/cms/documents/aca\\_book\\_final.pdf](https://www.amtamassage.org/uploads/cms/documents/aca_book_final.pdf).
- Craniosacral Therapy Alliance. (n.d.) Retrieved from <http://www.cstalliance.com/Curriculum/Certification.html>
- International Association of Structural Integrators [IASI]. (n.d.) New to structural integration? Retrieved from <http://www.theiasi.net/what-is-structural-integration->

Sincerely,

Siene Allen, LMT, IMAPT  
[siene.allen@gmail.com](mailto:siene.allen@gmail.com)

**From:** Deb McCusker  
**To:** Rep. Sam Kito  
**Cc:** representative.Louise.Statutes@alleged.gov  
**Subject:** Massage exemption  
**Date:** Tuesday, February 14, 2017 3:58:09 PM

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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 Rolwing, Structural Integration, and Massage Therapy. According to the definition in the Alaska Massage laws they appear to be related. Rolwing 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 Rolwing 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

## Support for HB110A

My name is Traci Gilmour. I am a Licensed Massage Therapist in Juneau, Alaska and currently hold a seat on the Alaska State Board of Massage.

The State Board of Massage has worked since the Massage Licensing Statute passed in April, 2014 to create regulations, Standards of Practice and approve over 1000 applicants to licensing and study statutes for loopholes and changes that may be needed.

This work has resulted in the Bill before the legislature. We are asking for a few changes that will strengthen the law.

An increase in required hours for students graduating from Massage School will provide future massage therapists with a more complete education to better serve patients and clients. The board has been researching and working with other states and organizations. The board recognizes the trend is moving toward 600-700 education hours for a requirement for licensing. As of 2015 there were 19 of 45 states requiring 600+ hours of education and more moving in that direction.

We have identified a need for reduced Bloodborne Pathogens CE requirements for the fact that there are few, if any, 4 hour classes available to therapists for renewal.

We are asking for the ability to create regulations governing Massage Therapy Establishments. State Investigations and the FBI in 2015 identified 29 illicit establishments in Anchorage alone and up to 130 throughout the state. The Municipality of Anchorage set forth to create their own Massage Establishment Licensing recognizing the statute didn't go far enough to reduce illegal massage parlors, citing a concern for Sex and Human Trafficking. The Board took up this task to ensure it had widespread reach.

Sex and Human Trafficking are pervasive in our state and society. Unfortunately, massage therapy is a haven for illicit activity. Fighting to protect our industry from people who seek to take advantage of others in the underground world of Human Trafficking will continue to be a focus for the State Board of Massage. The FBI notes that establishments can be entered for investigation, but the front desk staff and managers do not have to bear responsibility for what happens behind closed doors. In fact, according to the FBI, some of these establishments keep women on premises 24/7. They are forced to sleep, eat and work in seclusion. The Massage Therapy Establishment portion of the bill recognizes the need to add teeth to the statute and regulations would require establishments have a manager and lead therapist registered with the state that are held accountable for what happens onsite.

In regard to the concern for Sex and Human Trafficking, the Board has identified areas of law that may become a loophole for avoiding licensure. We request that bodyworkers falling under the exemption language register with the state and receive a 10 year exemption, specifically those that lay hands on the body. This would be a simple form filed with Professional Licensing.

None of these changes in the law negatively affect current licensees or applicants coming up for renewal in July. All three schools in the state of Alaska are 750+ hour schools.

We are committed to ensuring and providing a healthy, safe environment for therapists and their clients practicing and receiving Massage Therapy and bodywork. Thank you for your time and consideration.

Please see the attached PDF copies of the current Statute and Regulations and Code of Ethics and Standards of Practice.

# **Alaska Board of Massage Therapists**

## ***Code of Ethics and Standards of Practice***

***June 2015***



DEPARTMENT OF COMMERCE, COMMUNITY,  
AND ECONOMIC DEVELOPMENT

***DIVISION OF CORPORATIONS, BUSINESS  
AND PROFESSIONAL LICENSING***

**ALASKA BOARD OF MASSAGE THERAPISTS CODE OF ETHICS  
AND STANDARDS OF PRACTICE  
JUNE 2015**

In order to maintain a high standard of integrity in the profession and to safeguard the health and welfare of the public, massage therapists licensed in this state must adhere to the Alaska Board of Massage Therapists Code of Ethics and Standards of Practice:

**CODE OF ETHICS**

- 1) I will represent my qualifications honestly including education, certifications and professional affiliations and accurately inform clients, health care professionals and the public of the scope and limitations of my discipline. I will provide only those services I am qualified to perform.
- 2) I will provide treatment only where there is a reasonable expectation that it will be advantageous to the client and will acknowledge the limitations of and contraindications for massage therapy and refer clients to appropriate health care professionals when indicated.
- 3) I will not discriminate against clients and/or healthcare professionals.
- 4) I will abide by the Federal guidelines of the Health Insurance Privacy and Portability Act (HIPPA).
- 5) I will respect the client's right to refuse, modify or terminate treatment at will regardless of prior consent given.
- 6) I will exercise my right to refuse to treat any person or part of the body for just and reasonable cause.
- 7) I will respect the client's autonomy by providing draping and treatment in a way that ensures the safety, comfort and privacy of the client.
- 8) I will not, in any circumstance, initiate or engage in sexual conduct, activities, or sexualizing behavior involving a client, even if the client attempts to sexualize the relationship.
- 9) I will refuse any gifts or benefits that are intended to influence a referral, decision or treatment or those that are purely for personal gain and I will avoid any interest, activity or influence which may conflict with my obligation as a massage therapist to act in the best interest of my client or the profession.
- 10) I will refrain from practicing under the influence of alcohol, drugs or any illegal substances, with the exception of a prescribed dosage of prescription medication which does not impair my ability to practice safely.
- 11) I will report in accordance to AS 41.17.070 (a)(1) any suspected child abuse or neglect.

## STANDARDS OF PRACTICE

- 1) Obey all applicable local, state and federal laws when pertaining to massage therapy.
- 2) Maintain a record of daily clientele including name and date of service and adequate progress notes when applicable.
- 3) Provide a setting that is safe and meets all applicable legal requirements for health, safety, sanitation, hygiene, universal and standard precautions, in accordance with local, state and federal regulatory bodies including guidelines set by the Centers for Disease Control and Prevention (CDC), the National Institute of Health (NIH), and the Occupational Safety and Health Administration (OSHA).
- 4) Therapists shall prominently display the State of Alaska massage license in his or her place of business. Therapists will make available proof of licensure while practicing off site.
- 5) Therapists shall display or discuss a schedule of fees in advance of the session that is clearly understood by the client.

# ***Statutes and Regulations*** **Massage Therapists**

***July 2016***

*(Centralized Statutes and Regulations not included)*



DEPARTMENT OF COMMERCE, COMMUNITY,  
AND ECONOMIC DEVELOPMENT

***DIVISION OF CORPORATIONS, BUSINESS  
AND PROFESSIONAL LICENSING***

NOTE: The official version of the statutes in this document is printed in the Alaska Statutes, copyrighted by the State of Alaska. The official version of the regulations in this document is published in the Alaska Administrative Code, copyrighted by the State of Alaska. If any discrepancies are found between this document and the official versions, the official versions will apply.

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**CHAPTER 61.  
MASSAGE THERAPISTS.**

**Section**

- 10. Board established**
- 20. Duties and powers of board**
- 30. Qualifications for license**
- 40. Licensure by credentials**
- 50. Standards for license renewal**
- 60. Grounds for imposition of disciplinary sanctions**
- 70. Practice of massage therapy without license prohibited**
- 80. Exceptions to application of chapter**
- 90. Fees**
- 100. Definitions**

**Sec. 08.61.010. Board established.** The Board of Massage Therapists is established in the department. The board consists of five members appointed by the governor as follows:

(1) four licensed massage therapists who have been engaged in the practice of massage therapy in the state for the three years immediately preceding appointment and who shall remain actively engaged in the practice of massage therapy while serving on the board; not more than one member appointed under this paragraph may have an ownership or partnership interest in a massage school; and

(2) one public member; the governor may not appoint as a public member

(A) a licensed health care provider;

(B) an employee of the state; or

(C) a current or former member of another occupational licensing board established under AS 08.

**Sec. 08.61.020. Duties and powers of board.** In addition to the duties specified in AS 08.01, the board shall

(1) provide for the examination of applicants by the board or through a nationally recognized competency examination approved by the board and issue licenses to applicants the board finds qualified;

(2) adopt regulations governing

(A) licensing of massage therapists; and

(B) the practice of massage therapy;

(3) establish standards of professional competence and ethical conduct for massage therapists;

(4) establish standards for continuing education for massage therapists; standards adopted by the board under this paragraph must allow for approval of Internet-based continuing education courses;

(5) make available to the public a list of massage therapists licensed under this chapter;

(6) determine which states have educational and licensing requirements equivalent to the requirements of this state;

(7) enforce the provisions of this chapter and adopt and enforce regulations necessary to implement this chapter; and

(8) approve one or more nationally recognized competency examinations and publish and periodically update the list of approved examinations.

**Sec. 08.61.030. Qualifications for license.** The board shall issue a license to practice massage therapy to a person who

(1) applies on a form provided by the department;

(2) pays the fees established under AS 08.61.090;

(3) furnishes evidence satisfactory to the board that the person has completed a

(A) course of study of at least 500 hours of in-class supervised instruction and clinical work from an approved massage school; or

(B) board-approved apprenticeship program;

(4) is 18 years of age or older;

(5) has been fingerprinted and has provided the fees required by the Department of Public Safety under AS 12.62.16 for criminal justice information and a national criminal history record check; the fingerprints and fees shall be forwarded to the Department of Public Safety to obtain a report of criminal justice information under AS 12.62 and a national criminal history record check under AS 12.62.400;

(6) has a current cardiopulmonary resuscitation certification;

(7) has received at least four hours of safety education covering bloodborne pathogens and universal precautions in the two years preceding the application for the license; in this paragraph, "bloodborne pathogens" has the meaning given in AS 18.15.450;

(8) has successfully completed a nationally recognized competency examination approved by the board; and

(9) has not been convicted of, or pled guilty or no contest to, a crime involving moral turpitude, or who has been convicted of, or pled guilty or no contest to, a crime involving moral turpitude if the board finds that the conviction does not affect the person's ability to practice competently and safely.

**Sec. 08.61.040. Licensure by credentials.** The board shall issue a license to practice massage therapy to a person who

- (1) is 18 years of age or older;
- (2) applies on a form provided by the department;
- (3) pays the fees established under AS 08.61.090;
- (4) has submitted the person's fingerprints and the fees required by the Department of Public Safety under AS 12.62.160 for criminal justice information and a national criminal history record check; the fingerprints and fees shall be forwarded to the Department of Public Safety to obtain a report of criminal justice information under AS 12.62 and a national criminal history record check under AS 12.62.400;
- (5) is not the subject of an unresolved complaint or disciplinary action before a regulatory authority in this state or another jurisdiction;
- (6) has not had a certificate or license to practice massage therapy revoked, suspended, or voluntarily surrendered in this state or another jurisdiction;
- (7) has not been convicted of, or pled guilty or no contest to, a crime involving moral turpitude, or has been convicted of, or pled guilty or no contest to, a crime involving moral turpitude if the board finds that the conviction does not affect the person's ability to practice competently and safely;
- (8) has a current cardiopulmonary resuscitation certification; and
- (9) is currently
  - (A) licensed to practice massage therapy in another state or country that has licensing requirements that are substantially equal to or greater than the requirements of this state; or
  - (B) certified by a certification entity approved by the board.

**Sec. 08.61.050. Standards for license renewal.** The board shall renew a license issued under this chapter to a licensee who

- (1) pays the required fee;
- (2) meets the continuing education requirements established by the board;
- (3) has not been convicted of, or pled guilty or no contest to, a crime involving moral turpitude, or has been convicted of, or pled guilty or no contest to, a crime involving moral turpitude if the board finds that the conviction does not affect the person's ability to practice competently and safely;
- (4) has a current cardiopulmonary resuscitation certification; and
- (5) has been fingerprinted and has provided the fees required by the Department of Public Safety under AS 12.62.160 for criminal justice information and a national criminal history record check; the fingerprints and fees shall be forwarded to the Department of Public Safety to obtain a report of criminal justice information under AS 12.62 and a national criminal history record check under AS 12.62.400.

**Sec. 08.61.060. Grounds for imposition of disciplinary sanctions.** After a hearing, the board may impose a disciplinary sanction under AS 08.01.075 on a person licensed under this chapter if the board finds that the person

- (1) secured a license through deceit, fraud, or intentional misrepresentation;
  - (2) engaged in deceit, fraud, or intentional misrepresentation in the course of providing massage therapy services or engaging in massage therapy;
  - (3) advertised massage therapy services in a false or misleading manner;
  - (4) has been convicted of a felony or another crime that affects the licensee's ability to continue to practice competently and safely;
  - (5) intentionally or negligently engaged in, or permitted a person under the licensed massage therapist's supervision to engage in, client care that did not conform to minimum professional standards, whether or not actual injury to the client occurred;
  - (6) failed to comply with a provision of this chapter, a regulation adopted under this chapter, or an order of the board;
  - (7) continued to practice after becoming unfit because of
    - (A) professional incompetence; or
    - (B) addiction or severe dependency on alcohol or another drug that impairs the ability to practice safely;
- or
- (8) engaged in unethical conduct or sexual misconduct in connection with the delivery of massage therapy services to a client.

**Sec. 08.61.070. Practice of massage therapy without license prohibited.** (a) A person may not practice massage therapy or represent that the person is a massage therapist unless the person holds a valid license under this chapter. In this subsection, a person represents that the person is a massage therapist when the person adopts or uses a title or description of services that incorporates one or more of the following terms or designations: massage, massage practitioner, massage therapist, massage therapy, therapeutic massage, massage technician, massage technology, massagist, masseur, masseuse, myotherapist, myotherapy, or another term describing a traditional European or contemporary western massage method, or a derivation of a term that implies a massage technique or method.

- (b) A person who knowingly violates (a) of this section is guilty of a class B misdemeanor.

**Sec. 08.61.080. Exceptions to application of chapter.** This chapter does not apply to a

- (1) person licensed in the state under a statute outside this chapter who performs massage therapy within the scope of practice for which the person's license was issued;
- (2) person who, while acting in an official capacity as an employee of the United States government, performs massage therapy;
- (3) person who is licensed, registered, or certified in another state, territory, the District of Columbia, or a foreign country while the person is temporarily
  - (A) practicing massage therapy in this state in connection with teaching a course related to massage therapy; or
  - (B) consulting with a person licensed under this chapter;
- (4) student enrolled in an approved massage school or course of study who is completing a clinical requirement for graduation under the general supervision of a person licensed under this chapter if the student is clearly identified as a student while performing massage therapy services on members of the public and is not compensated for the massage therapy services;
- (5) person only performing massage therapy on members of the person's family;
- (6) person only performing techniques that do not involve contact with the body of another person;
- (7) person only performing techniques that involve resting the hands on the surface of the body of another person without delivering pressure to or manipulating the person's soft tissues;
- (8) person only performing services such as herbal body wraps, skin exfoliation treatments, or the topical application of products to the skin for beautification purposes when the services do not involve direct manipulation of the soft tissues of the body;
- (9) person only performing massage therapy for the athletic department of an institution maintained by public funds of the state or a political subdivision of the state or only practicing massage therapy for the athletic department of a school or college approved by the board using recognized national professional standards;
- (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;
- (11) person 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;
- (12) person performing only the traditional practices of Native American traditional healers;
- (13) person practicing only the manipulation of the soft tissues of the hands, feet, or ears and not holding out to be a massage therapist.

**Sec. 08.61.090. Fees.** The department shall set fees under AS 08.01.065 for application, license issuance, license renewal, and investigation under this chapter.

**Sec. 08.61.100. Definitions.** In this chapter,

- (1) "approved massage school" means a massage therapy school or program that
  - (A) has an authorization to operate from the Alaska Commission on Postsecondary Education or a similar entity in another state; or
  - (B) is accredited by a nationally recognized accrediting agency;
- (2) "board" means the Board of Massage Therapists;
- (3) "department" means the Department of Commerce, Community, and Economic Development;
- (4) "massage therapist" means a person licensed under this chapter;
- (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"
  - (A) includes manual techniques applied with the intent to physically affect local soft tissues, such as pressure, friction, stroking, percussion, kneading, vibration, muscular assessment by palpation, range of motion for purposes of demonstrating muscle exertion for muscle flexibility, nonspecific stretching, and application of superficial heat, cold, water, lubricants, or salts;
  - (B) does not include diagnosis, the prescription of drugs or medicines, the practice of physical therapy, attempts to manipulate any articulation of the body or spine, or mobilization of these articulations by use of a thrusting force.

**CHAPTER 79.  
MESSAGE THERAPISTS.**

**Article**

1. **Licensing (12 AAC 79.100 – 12 AAC 79.130)**
2. **License Renewal and Continuing Education (12 AAC 79.200 – 12 AAC 79.220)**
3. **General Provisions (12 AAC 79.900 – 12 AAC 79.990)**

**ARTICLE 1.  
LICENSING.**

**Section**

100. **Application for licensure by examination**
110. **Application for licensure by credentials**
120. **Application for transitional license**
130. **Criminal justice information**

**12 AAC 79.100. APPLICATION FOR LICENSURE BY EXAMINATION.** (a) The board will issue a license by examination to practice massage therapy to an applicant who meets the requirements of AS 08.61.030 and this section.

(b) An applicant for licensure by examination under this section must submit

- (1) a completed application, on a form provided by the department; the completed application must include
  - (A) the personal identification information requested on the form;
  - (B) information related to the grounds of disciplinary sanctions under AS 08.61.060;
  - (C) the applicant's fingerprint information described in 12 AAC 79.130; and
  - (D) the application fee, fingerprint processing fee, and license fee specified in 12 AAC 02.396;
- (2) verification of massage therapy education; verification must consist of
  - (A) an official school transcript evidencing completion of a course of study of at least 500 hours of in-class supervised instruction and clinical work from a massage therapy school or program that
    - (i) has authorization to operate from the Alaska Commission on Postsecondary Education under AS 14.48 or from a similar agency of another state; or
    - (ii) is accredited by a nationally recognized accrediting agency; or
  - (B) satisfactory evidence of completion of a board-approved apprenticeship program;
- (3) verification of having passed
  - (A) the Massage and Bodywork Licensing Examination administered by the Federation of State Massage Therapy Boards; or
  - (B) the National Certification Examination for Therapeutic Massage or the National Certification Examination for Therapeutic Massage and Bodywork, each administered by the National Certification Board for Therapeutic Massage and Bodywork, if the applicant took the examination before February 1, 2015;
- (4) a current certification in cardiopulmonary resuscitation from the American Red Cross, American Heart Association, American Safety and Health Institute, or an equivalent organization; and
- (5) verification of having completed at least four hours of safety education in bloodborne pathogens and universal precautions in the two years preceding the application.

**Authority:** AS 08.61.020 AS 08.61.030 AS 08.61.090

**12 AAC 79.110. APPLICATION FOR LICENSURE BY CREDENTIALS.** (a) The board will issue a license by credentials to practice massage therapy to an applicant who meets the requirements of AS 08.61.040 and this section.

(b) An applicant for licensure by credentials under this section must submit

- (1) a completed application, on a form provided by the department; the completed application must include
  - (A) the personal identification information requested on the form;
  - (B) information related to the grounds of disciplinary sanctions under AS 08.61.060;
  - (C) the applicant's fingerprint information described in 12 AAC 79.130; and
  - (D) the application fee, fingerprint processing fee, and license fee specified in 12 AAC 02.396;
- (2) verification that the applicant
  - (A) holds a current license to practice massage therapy in another state, jurisdiction, or country where licensing requirements are substantially equal to or greater than the requirements of this state; or
  - (B) certified by the American Massage Therapy Association, the National Certification Board for Therapeutic Massage and Bodywork, or other board-approved credentialing entity; and
- (3) current certification in cardiopulmonary resuscitation through the American Red Cross, American Heart Association, American Safety and Health Institute, or an equivalent organization.

**Authority:** AS 08.61.020 AS 08.61.040 AS 08.61.090  
AS 08.61.030

**12 AAC 79.120. APPLICATION FOR TRANSITIONAL LICENSE.** (a) The board will issue a license under this section to an applicant who applies for licensure before July 1, 2017, and who meets the requirements of AS 08.61.030(1), (2), (4) – (6), and (9) and this section.

(b) An applicant for licensure under this section must submit

- (1) a completed application, on a form provided by the department; the completed application must include
  - (A) the personal identification information requested on the form;
  - (B) information related to the grounds of disciplinary sanctions under AS 08.61.060;
  - (C) the applicant's fingerprint information described in 12 AAC 79.130; and
  - (D) the application fee, fingerprint processing fee, and license fee specified in 12 AAC 02.396;
- (2) a current certification in cardiopulmonary resuscitation through the American Red Cross, American Heart Association, American Safety and Health Institute, or an equivalent organization; and
- (3) verification that the applicant owned, operated, or worked for a massage therapy business and performed the practice of massage therapy before July 1, 2015, by submitting
  - (A) a copy of the applicant's signed federal tax income tax returns for one of the five years immediately preceding July 1, 2015, listing the person's occupation as massage therapist in this state;
  - (B) copies of the applicant's signed schedule C federal income tax returns for one of the five years immediately preceding July 1, 2015, demonstrating that the person has reported income from the practice of massage therapy in this state;
  - (C) a sworn statement from the applicant's employer in this state attesting that the applicant has practiced massage therapy within the five years immediately preceding July 1, 2015, a copy of the business license of the applicant's employer, and a copy of the applicant's Form W-2 or Form 1099-MISC from the same employer;
  - (D) a copy of the municipal occupational license that was current on the day before July 1, 2015, from a municipality in this state, stating the applicant's occupation as a massage therapist;
  - (E) documentation that the person has, for at least one year immediately preceding July 1, 2015, been an active member, as a massage therapist, in a national professional massage therapy association that was established before January 1, 2000, offers professional liability insurance as a benefit of membership, and has an established code of professional ethics; or
  - (F) other documentation satisfactory to the board.

**Authority:** AS 08.61.020 AS 08.61.090 Sec. 10, ch. 114, SLA 2014  
AS 08.61.030

**12 AAC 79.130. CRIMINAL JUSTICE INFORMATION.** (a) An applicant for licensure under 12 AAC 79.100, 12 AAC 79.110, or 12 AAC 79.120 must submit with the application the applicant's fingerprints and other information required by the Department of Public Safety to obtain state and national criminal justice information under AS 12.62 and AS 12.64.

(b) The board will submit the fingerprints received under this section to the Department of Public Safety and request the Department of Public Safety to

- (1) submit the fingerprints to the Federal Bureau of Investigation for a report on national criminal justice information;
- (2) perform a check for state criminal justice information; and
- (3) report to the board the results of the criminal justice information checks under (1) and (2) of this subsection.

(c) The request under (b) of this section for a criminal justice information report does not delay consideration of the applicant's license application. If criminal justice information that raises questions about an applicant's qualifications for licensure is received after a license has been issued to the applicant, the department and the board will take action under AS 08.61 and AS 44.62 as appropriate.

**Authority:** AS 08.61.020 AS 08.61.030 AS 08.61.040

## ARTICLE 2. LICENSE RENEWAL AND CONTINUING EDUCATION.

### Section

#### 200. License renewal

#### 210. Continuing education requirements

#### 220. Audit and documentation

**12 AAC 79.200. LICENSE RENEWAL.** (a) A massage therapy license must be renewed biennially on or before September 30 of odd-numbered years. A renewal reminder document will be mailed to each currently licensed massage therapist at least 30 days before the renewal date. Failure to receive a renewal notice does not

relieve a licensee from the responsibility of renewing a license on time.

(b) An applicant for renewal of a massage therapy license must meet the requirements of AS 08.61.050 and this section. A massage therapist applying for license renewal must submit

- (1) a completed renewal application on a form provided by the department;
- (2) the applicant's fingerprint information described in 12 AAC 79.130;
- (3) the fingerprint processing fee and the license renewal fee specified in 12 AAC 02.396;
- (4) a current certification in cardiopulmonary resuscitation through the American Red Cross, American Heart Association, American Safety and Health Institute, or an equivalent organization; and
- (5) documentation that the massage therapist satisfied the continuing education requirements in 12 AAC 79.210.

**Authority:** AS 08.61.020 AS 08.61.050

**12 AAC 79.210. CONTINUING EDUCATION REQUIREMENTS.** (a) An applicant for renewal of a massage therapy license,

(1) for a biennial licensing period that begins on or after July 1, 2015, must document at least six continuing education credits, all of which may be met through Internet-based continuing education courses;

(2) for a biennial licensing period that begins on or after July 1, 2017, must document at least 16 continuing education credits, all of which may be met through Internet-based continuing education courses.

(b) An applicant for renewal under (a)(2) of this section may receive two hours of continuing education credit for completion of hands-on cardiopulmonary resuscitation through the American Red Cross, American Heart Association, American Safety and Health Institute, or an equivalent organization.

(c) An applicant for renewal under (a)(2) of this section may receive four hours of continuing education credit for completion of a bloodborne pathogens and universal precautions course once every six years.

(d) Continuing education must be completed through a

(1) board-approved massage therapy or bodywork therapy school or training program;

(2) regionally or nationally accredited institution of higher education; a course, seminar, workshop, or other program through that institution must be approved by the board as directly related to the skills and knowledge required for the practice of massage therapy, and includes a bloodborne pathogens and universal precautions course under (c) of this section; or

(3) local, state, or national professional organization that serves the massage therapy profession, including

(A) Associated Bodywork and Massage Professionals;

(B) the American Massage Therapy Association;

(C) the Federation of State Massage Therapy Boards; and

(D) the National Certification Board for Therapeutic Massage and Bodywork.

(e) For the purposes of this section,

(1) one continuing education credit equals one hour of classroom instruction between instructor and participant;

(2) one academic semester credit equals 15 contact hours; and

(3) one academic quarter credit equals 10 contact hours.

(f) An applicant for renewal is responsible for maintaining adequate and detailed records of all continuing education hours claimed and shall make the records available to the board upon request under 12 AAC 79.220. Records must be retained for four years from the date the contact hours were obtained.

**Authority:** AS 08.61.020 AS 08.61.030 AS 08.61.050

**12 AAC 79.220. AUDIT AND DOCUMENTATION.** A licensee shall comply with all applicable requirements of 12 AAC 02.960 and 12 AAC 02.965. If selected for an audit of continuing education activities, the licensee shall cooperate with the department and shall submit all requested verifications of continuing education activities claimed by the licensee.

**Authority:** AS 08.61.020 AS 08.61.050

### ARTICLE 3. GENERAL PROVISIONS.

#### Section

**900. Code of ethics and standards of practice**

**910. "Moral turpitude" defined**

**990. Definitions**

**12 AAC 79.900. CODE OF ETHICS AND STANDARDS OF PRACTICE.** The *Alaska Board of Massage Therapists Code of Ethics and Standards of Practice*, dated June 2015, is adopted by reference as the code of ethics

for massage therapists in the state. In order to maintain a high standard of integrity in the profession and to safeguard the health and welfare of the public, massage therapists licensed in this state shall adhere to the code of ethics.

**Authority:** AS 08.61.020

**Editor's note:** A copy of the *Alaska Board of Massage Therapists Code of Ethics and Standards of Practice*, adopted by reference in 12 AAC 79.900, may be obtained from the Department of Commerce, Community, and Economic Development, Division of Corporations, Business and Professional Licensing, Board of Massage Therapists, State Office Building, 9th Floor, 333 Willoughby Avenue, Juneau, Alaska 99801; phone (907) 465-3811; website at <https://www.commerce.alaska.gov/web/cbpl/ProfessionalLicensing/BoardofMassageTherapists.aspx>.

**12 AAC 79.910. "MORAL TURPITUDE" DEFINED.** Under AS 08.61.030, a crime involving moral turpitude includes

- (1) homicide;
- (2) manslaughter;
- (3) assault;
- (4) stalking;
- (5) kidnapping;
- (6) sexual assault;
- (7) sexual abuse of a minor;
- (8) unlawful exploitation of a minor, including possession or distribution of child pornography;
- (9) indecent exposure;
- (10) unlawful distribution or possession for distribution of a controlled substance;
- (11) prostitution;
- (12) sex trafficking.

**Authority:** AS 08.61.020 AS 08.61.030

**12 AAC 79.990. DEFINITIONS.** (a) In AS 08.61 and this chapter,

(1) "criminal justice information" has the meaning given in AS 12.62.900;

(2) "universal precautions" means the infectious control precautions that are recommended by the United States Department of Health and Human Services, Centers for Disease Control and Prevention, to be used to prevent the transmission of bloodborne germs such as human immunodeficiency virus and hepatitis B virus.

(b) In this chapter, unless the context requires otherwise,

- (1) "board" means the Board of Massage Therapists;
- (2) "department" means the Department of Commerce, Community, and Economic Development;
- (3) "licensee" means a massage therapist licensed under AS 08.61.

**Authority:** AS 08.61.020

## Crystal Koeneman

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**From:** Athenia Large <athenialarge@gmail.com>  
**Sent:** Monday, February 13, 2017 11:44 AM  
**To:** Sen. Pete Kelly; Sen. Peter Micciche; Rep. Sam Kito; Rep. Colleen Sullivan-Leonard; Rep. Chris Birch; Rep. Gary Knopp; Rep. Bryce Edgmon; Rep. Chris Tuck; Louise.Stutes@akleg.gov  
**Subject:** Alaska Massage Board new regulations regarding SI practitioners

Hello and thank you for taking the time to read this.

I believe I have an important voice in this area. I graduated from Massage School in 2010 and became licensed (and still hold my license) in Oregon. I graduated from Structural Integration school in 2013 (KMI) and have maintained my professional board licensure (IASI) since then.

I have also become licensed as a MT in Alaska. I have been working in Alaska full time since 2010 doing both Structural Integration and Massage Therapy. I kept my OR license current because I felt licensure was important, and I was very happy that we have taken steps to license touch in Alaska.

So I feel I should voice my opinion, since I am one of the people who agrees with what the massage board is trying to do.

I believe until SI gets itself organized to have its own regulatory and licensing board, that it would protect every Alaskan to have SI practitioners be required to register for an exemption in order to avoid having to become licensed as a massage therapist. The benefit is they are helping to police for Structural Integration for us. I specifically agree that in order to get the exemption you would have to show you have CURRENT membership in IASI. I know now the MT board is writing the regulations to allow membership to both RISI and IASI to qualify for exemption but I believe that even making it just IASI would be better. RISI membership is only for graduates of one school of SI, IASI is the umbrella organization that does board certification for all qualified schools of SI (including RISI). This could go a long way towards encouraging SI practitioners to become and stay IASI certified, which would help the future of our profession.

As it stands, Structural Integration is taught in many massage schools as a modality. Further, regular massage therapists are allowed and encouraged to take continuing education from Structural Integrators and learn techniques of Structural Integration. This creates a very fuzzy and grey middle area. Many MTs do not understand how SI is different. Most people looking for massage/SI don't understand the difference. I don't want to think that practitioners are thinking they can take a class in massage school or do some CE about SI and then claim they do SI and decide to exempt themselves from the \$600 fee for a MT license. This weakens the SI profession as a whole and also dilutes the understanding of what exactly makes us different.

Even within the SI profession it is difficult to say what really constitutes an "SI session" and many SI practitioners do things very differently than they were taught in school. Until SI can clearly state how we are different from massage, and why the difference matters to the average individual, I don't think it is fair for the profession to say that we are vastly different from massage and don't have to be held to the same standards. Also, it is VERY expensive to become licensed in Alaska for Massage Therapy (it cost \$600 in Alaska vs. \$150 in Oregon). I think that having a small fee for exemption could help offset the huge burden MT's here are paying. Legislation and licensing help us get more respect from others in the medical field as well as more compensation from insurance carriers (hopefully) and this will help both MT's and SI's in the future. I think both MT's and SI's should help bear the cost of this. Also, I have noted that most SI practitioners

charge MUCH more for a session than MT's do, so again some of the burden of the cost of licensure should fall to those charging more (sometimes double) to their clients.

In the absence of SI having a regulatory board and licensing in AK, to protect consumers and to prevent prostitution and other unsavory elements, I believe we should welcome the mandatory regulations proposed by the MT board, so that we can rest assured that all those claiming to be SI practitioners in AK have graduated from a good SI school and are professional enough to keep current on their membership in a professional organization, and every practitioner in Alaska that touches a body to help it heal has been vetted and found competent and safe by a regulatory board.

The MT board **IS NOT TRYING TO TAKE AWAY OUR EXEMPTION**, and I resent all the chatter implying that this is the beginning of the end for SI after our hard won battle to get the exemption. The MT board is working with SI, and giving us respect in our desire to push our profession further. They just believe that until that happens we should still register through them. I think this is a very fair compromise. I also think we will lose this respect they are giving us if we fight over every little thing instead of focusing our attention (and money) on furthering our own licensing (and education) goals.

I also think that us fighting them when they are trying to work with us will only hurt us in the future. If we fight them on this, it will hurt our relationship with them and they may try to take away the exemption entirely. I think maintaining the exemption is VERY IMPORTANT if we SI's really do intend to develop our own licensing board in Alaska. Many other states have fought the same fight and lost and are not considered exempt from state licensing for MT. I feel like we should be grateful we get the exemption and happy to have the MT board working with us and policing for us to make sure that people claiming to be SI practitioners actually (and EXCLUSIVELY) do structural integration.

Respectfully,

Athenia Large  
517 Carolyn St.  
Kodiak, AK  
99615

907-539-7660

## Caitlyn Ellis

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**From:** Crystal Koeneman  
**Sent:** Tuesday, February 14, 2017 2:40 PM  
**To:** House Labor and Commerce  
**Subject:** FW: HB110

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

## Support for HB110A

My name is Traci Gilmour. I am a Licensed Massage Therapist in Juneau, Alaska and currently hold a seat on the Alaska State Board of Massage.

The State Board of Massage has worked since the Massage Licensing Statute passed in April, 2014 to create regulations, Standards of Practice and approve over 1000 applicants to licensing and study statutes for loopholes and changes that may be needed.

This work has resulted in the Bill before the legislature. We are asking for a few changes that will strengthen the law.

An increase in required hours for students graduating from Massage School will provide future massage therapists with a more complete education to better serve patients and clients. The board has been researching and working with other states and organizations. The board recognizes the trend is moving toward 600-700 education hours for a requirement for licensing. As of 2015 there were 19 of 45 states requiring 600+ hours of education and more moving in that direction.

We have identified a need for reduced Bloodborne Pathogens CE requirements for the fact that there are few, if any, 4 hour classes available to therapists for renewal.

We are asking for the ability to create regulations governing Massage Therapy Establishments. State Investigations and the FBI in 2015 identified 29 illicit establishments in Anchorage alone and up to 130 throughout the state. The Municipality of Anchorage set forth to create their own Massage Establishment Licensing recognizing the statute didn't go far enough to reduce illegal massage parlors, citing a concern for Sex and Human Trafficking. The Board took up this task to ensure it had widespread reach.

Sex and Human Trafficking are pervasive in our state and society. Unfortunately, massage therapy is a haven for illicit activity. Fighting to protect our industry from people who seek to take advantage of others in the underground world of Human Trafficking will continue to be a focus for the State Board of Massage. The FBI notes that establishments can be entered for investigation, but the front desk staff and managers do not have to bear responsibility for what happens behind closed doors. In fact, according to the FBI, some of these establishments keep women on premises 24/7. They are forced to sleep, eat and work in seclusion. The Massage Therapy Establishment portion of the bill recognizes the need to add teeth to the statute and regulations would require establishments have a manager and lead therapist registered with the state that are held accountable for what happens onsite.

In regard to the concern for Sex and Human Trafficking, the Board has identified areas of law that may become a loophole for avoiding licensure. We request that bodyworkers falling under the exemption language register with the state and receive a 10 year exemption, specifically those that lay hands on the body. This would be a simple form filed with Professional Licensing.

None of these changes in the law negatively affect current licensees or applicants coming up for renewal in July. All three schools in the state of Alaska are 750+ hour schools.

We are committed to ensuring and providing a healthy, safe environment for therapists and their clients practicing and receiving Massage Therapy and bodywork. Thank you for your time and consideration.

Please see the attached PDF copies of the current Statute and Regulations and Code of Ethics and Standards of Practice.

**From:** [Crystal Koeneman](mailto:Crystal.Koeneman)  
**To:** [House Labor and Commerce](mailto:House.Labor.and.Commerce)  
**Subject:** FW: HB110  
**Date:** Tuesday, February 14, 2017 2:39:54 PM

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

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

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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

**From:** [Rep. Sam Kito](#)  
**To:** [House Labor and Commerce](#)  
**Subject:** FW: HB 110  
**Date:** Tuesday, February 13, 2018 10:08:42 AM

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**From:** Christine Issel [mailto:christinec.issel@gmail.com]  
**Sent:** Tuesday, February 13, 2018 9:36 AM  
**To:** Rep. Sam Kito <Rep.Sam.Kito@akleg.gov>  
**Subject:** HB 110

Representative Kito—

The American Reflexology Certification Board ([www.arcb.net](http://www.arcb.net)) approves of the new 'Work Draft' of HB 110 as it stands, as long as there are no changes to the draft that would effect any of the current exemptions in the massage law.

Sincerely,

Christine Issel

ARCB Legislative Consultant



Dear Representative Kito,

Thank you for your continued support of Massage Therapists in Alaska. We have been actively following your efforts with HB 275 and 110 and wanted to offer you our full support for these bills. We believe that the extension of the State Board of Massage Therapy is essential to our profession in Alaska and applaud your efforts to move this bill forward.

We strongly support CS HB 110 (L&C) work draft 30-LS0157\U- that which has removed exemption language from a previous version and also includes the fingerprinting change to once every six years. AMTA Alaska Chapter encourages you to move HB 110 version U forward as it currently is, addressing the issues facing Alaskan Massage Therapists in one, comprehensive piece of legislation.

Again, we deeply appreciate your support and efforts on our behalf.

The Alaska AMTA Chapter Board of Directors

**From:** [Sorcha Hazelton](#)  
**To:** [Crystal Koeneman; Caitlyn Ellis](#)  
**Subject:** FW: HB 110 Work-Draft  
**Date:** Wednesday, February 14, 2018 8:27:38 AM

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**From:** Iris Aharonovich [mailto:[irisaharonovich@reflexology-usa.org](mailto:irisaharonovich@reflexology-usa.org)]  
**Sent:** Tuesday, February 13, 2018 6:38 PM  
**To:** Rep. Sam Kito <[Rep.Sam.Kito@akleg.gov](mailto:Rep.Sam.Kito@akleg.gov)>  
**Subject:** HB 110 Work-Draft

Representative Sam Kito,  
The Reflexology association of America - RAA - want to approves the new "work draft" of HB 110 as it stands. This said when there will not be any changes to this draft that would effect the current exemption for reflexology in the massage law.

Iris Aharonovich  
Director, Reflexology Association of America  
Chair - Legislative Committees  
<http://reflexology-usa.org>  
[facebook.com/ReflexologyAssociationofAmerica](https://www.facebook.com/ReflexologyAssociationofAmerica)

**TLC Massage Therapy  
Traci K Gilmour, LMT  
Juneau, Alaska  
AK License #102012  
907 209 2371**



February 15, 2018

Representative Sam Kito  
State Capitol Room 403  
Juneau, AK 99801

Representative Kito,

Thank you for your support and sponsorship of HB110U. I support this bill's CS as written and encourage its passage through committee.

HB110U will result in a more highly educated licensee by increasing required education hours for new applicants. A highly educated massage therapist is better able to treat and communicate with their clients and patients. Graduates will have increased knowledge of Medical Massage and understand the need for continuing to learn over the course of their careers. More information leads to more informed receivers of massage and a greater ability by the therapist to answer questions and help consumers of massage achieve positive long term results.

Licensed Massage Therapists are experiencing increased credibility in the Medical community and are more widely accepted into jobs in medical settings. This credibility allows for collaboration with medical professionals to create a better course of treatment, increasing the possibility for long term healing and relief from pain.

Massage Establishment Licensing is a step toward decreasing human trafficking in massage industry. Increased expectations from the public of highly trained therapists leads to legitimacy of profession due to increased knowledge about our services. We can reduce the stigma and availability of illicit business by networking with authorities such as FBI, State and local police, as well as national organizations directly related to reducing Human Trafficking in Alaska.

Reducing Continuing Education requirements of Bloodborne Pathogens and the frequency of fingerprinting help licensees with the cost of renewals. While the cost of obtaining a license has been reduced, I believe the suggested changes are another step to helping licensees afford to continue their good work and remain in the business of encouraging wellness for Alaskans.

Thank you for your support of the massage industry,

Traci K Gilmour, LMT

**From:** [Edric Carrillo](#)  
**To:** [Caitlyn Ellis](#)  
**Subject:** FW: HB110  
**Date:** Thursday, February 15, 2018 4:44:38 PM

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**From:** Adrienne [mailto:threefaheys@aol.com]  
**Sent:** Thursday, February 15, 2018 1:18 PM  
**To:** Rep. Sam Kito <Rep.Sam.Kito@akleg.gov>  
**Subject:** HB110

Dear Representative Kito:

Since the "Work Draft" of HB110 contains no references to exempted practices and makes no changes whatsoever to the legal status of these practices within the massage law, I have no objection to this current version of the bill and would respectfully request that you vote in favor of it.

Sincerely,

Adrienne L. Fahey  
Nationally Board Certified Reflexologist

## Crystal Koeneman

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**From:** Devron Hellings <hellings.family@gmail.com>  
**Sent:** Wednesday, February 15, 2017 1:01 PM  
**To:** Rep. Sam Kito  
**Subject:** House Bill 110

Honorable Representative Sam Kito,

At a minimum, House Bill 110 must have more discussion and collaboration between the massage board body and the Rolwing, Acupuncture and Reflexology practitioners *before* a final vote on this bill is undertaken. All Alaskans are concerned about human trafficking. I believe there is overwhelming evidence (and plenty of innuendo) that sex trafficking is often occurs under the “massage” mantle. The incidence of sex trafficking in the established professional offices of Rolwing, Acupuncture or Reflexologists (those that touch hands, feet and ears) simply does not occur with any measurable frequency. Illicit Massage “therapists” are moving targets, for they set up shop here and there —it makes sense to want to establish a registry for massage therapists, to increase the training hour requirements.

Rolwing practitioners are vetted in the training application process, undergo rigorous educational and hands-on training, are required to comply with periodic licensure education, and this exceeds what the massage board and its industry seeks. Ultimately, House Bill 110, as submitted by the massage board and industry boils down to a ‘money grab’. It is akin to your car insurance agent demanding that you prove, for a fee, that you passed the eye exam to operate a vehicle. The Department of Motor Vehicles has that responsibility and oversight. National ethics and other professional bodies provide oversight and compliance for Rolwing and Acupuncture practitioners.

House Bill 328 specifically exempted Rolfers and Alaska Native Healers from the grasping reach of the massage board, yet, the massage board is only going after Rolfers and those that touch hands, ears and feet, which is what Acupuncturists and Reflexologists do. Alaska Native Healers do similar work.

House Bill 110 is being rushed through the Labor Committee without full knowledge and participation of practitioners that will be unduly impacted should this porous bill be voted on.

Respectfully Submitted,

Devron Hellings  
Alaska Native Super Voter  
House District 24, Precinct 730  
2920 Hogan Bay Circle  
Anchorage, AK 99515

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.

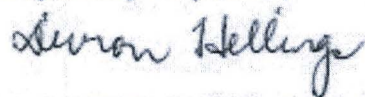
I am and have been a Rolfig client for about 30 years; I am also a regular Acupuncture patient; in addition, I receive therapeutic massage from a licensed therapeutic massage therapist. I am well aware of the different levels of education, training (initial and ongoing), and peer review Certified Rolfers, 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](mailto:Representative.Sam.Kito@akleg.gov)

Vice Chair, Rep. Adam Wool  
[Representative.Adam.Wool@akleg.gov](mailto:Representative.Adam.Wool@akleg.gov)

Rep. Andy Josephson  
[Representative.Andy.Josephson@akleg.gov](mailto:Representative.Andy.Josephson@akleg.gov)

Representative Louise Stutes  
House Majority Whip  
[Representative.Louise.Stutes@akleg.gov](mailto:Representative.Louise.Stutes@akleg.gov)

Representative Chris Birch  
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Representative Colleen Sullivan-Leonard  
[Representative.Colleen.Sullivan-Leonard@akleg.gov](mailto: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](http://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,  
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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/bic/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/NELIS/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 Rolwing, Structural Integration, and Massage Therapy. According to the definition in the Alaska Massage laws they appear to be related. Rolwing 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 Rolwing 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

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**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](#)

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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](#)  
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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 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 premera 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](#)

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[Elizabeth Block Haus](#) It's a joke! The same "Asian therapuetic 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 \$\$\$.

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[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](#)

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[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](#)

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[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](#)

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[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](#)

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[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](#)  
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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](#)

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[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](#)

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[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](#)

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[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 Rolfing is a distinctly different profession from massage therapy. And it is not massage therapy. Clients that seek the services of Rolfing®, 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, asymmetrical 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 Rolfing 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 ®**

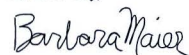
2. The intent of HB110 is not clear as it relates to exemptions in current statute. Rolfers participated in the State Board of Massage Therapists meetings over the past year. We understand based on those proceedings that the FBI requested the state create through legislation a registry of massage establishments 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 Rolfig in the Anchorage community for 29 years. We are presently legally exempt from the Alaska Massage License. We want to remain exempt. Rolfig 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

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.

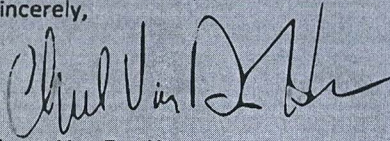
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Thank you for your consideration of these important issues as you move forward with your committee process. Without understanding the above issues, the official position of the Alaska Rolfers is that they do not wish to participate in Alaska's regulatory 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 Rolfig (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

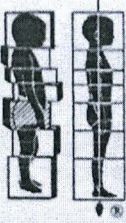
Sincerely,



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.

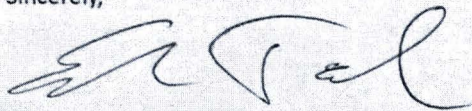
1. It is important to clarify that Rolwing is a distinctly different profession and is not massage therapy. Rolwing®, also known as Structural Integration, is sometimes confused with massage therapy but it is entirely different. Structural integration is based on the work of Dr. Ida P. Rolf. It is a 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 Rolwing 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 Rolfig (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', written in a cursive style.

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 Rolfing 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 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 907-230-4645

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 Roling 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 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.
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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 long horizontal flourish extending to the right.

Anna Kokaurova

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.
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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 ROLF®

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 Rolfing® 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 Rolfing® 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](http://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 Rolwing (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 9<sup>th</sup> 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 9<sup>th</sup> 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

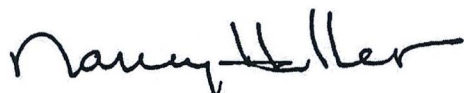
(D) Provides contact information in the person's place of business for any organization or agency that has recognized the practitioner.

(\_\_.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](mailto:fgnapres@gmail.com)



Andrea Wiener, FGNA Government Relations Administrator  
[andrea.wiener@feldenkraisguild.com](mailto:andrea.wiener@feldenkraisguild.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

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

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**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](mailto: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](mailto:rockinga@gci.net)

From: AC Anderson <[rockinga@gci.net](mailto:rockinga@gci.net)>

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

To: <sup>blumer</sup> [dianne.bloomer@akleg.gov](mailto:dianne.bloomer@akleg.gov)

Cc: AC Anderson <[rockinga@gci.net](mailto: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 Rolfing and massage and am well aware of the extreme differences in these therapies.

Rolfing 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](mailto: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](mailto:rockinga@gci.net)

From: AC Anderson <[rockinga@gci.net](mailto:rockinga@gci.net)>  
Date: February 13, 2017 at 5:39:00 PM AKST  
To: [dianne.bloomer@akleg.gov](mailto:dianne.bloomer@akleg.gov)  
Cc: AC Anderson <[rockinga@gci.net](mailto: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 Rolfing and massage and am well aware of the extreme differences in these therapies.

Rolfing and massage are two distinctly different professions.

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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!



# Reflexology Association of America

Administration Office – 14471 81<sup>st</sup> Ave., Dyer, IN 463114

E-mail: [infoRAA@reflexology-usa.org](mailto:infoRAA@reflexology-usa.org) - [www.reflexology-usa.org](http://www.reflexology-usa.org)

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*Director*

Sunday, February 11, 2018

TO: Representative Sam Kito  
FROM: Iris Aharonovich, Reflexology Association of America  
RE: Testimony in Opposition to HB 110

Last year 2017, you saw the huge difference between Massage and reflexology and you understand that reflexology need to Stand by itself or at least be exempt from the massage. The result of that bill HB110 was exemption to reflexology.

On Friday, February 16, 2018, this bill will hear again, and it will be same issue.

Reflexology is NOT massage:

1. Reflexologist have their own Board of certification, ARCB - American reflexology Certification Board, And - RAA - Reflexology Association of America, membership association.
2. Reflexology is a protocol of manual techniques, such as thumb and finger-walking, hook and backup and rotating-on-a-point, applied to specific reflex areas predominantly on the feet and hands. These techniques stimulate the complex neural pathways linking body systems, supporting the body's efforts to function optimally.
3. The effectiveness of reflexology is recognized worldwide by various NIH - National Health Institutions and the public at large as a distinct complementary practice within the holistic health field.
4. Reflexology has: 5 State Law: North-Dakota, Tennessee, New-Hampshire, Washington, Nevada 32 State Exempting: Arizona, California, Colorado, Georgia, Idaho, Illinois, Indiana, Iowa, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Montana, New Jersey, New Mexico, North Carolina, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Dakota, Texas, Utah, Wisconsin.
5. Public Safety - Reflexology applied on client who fully clothes just barefoot. Reflexologist touch feet, hands and outer ear only.
6. Money - The only reason we can see for this at all is not professionalism, but money to help the massage therapists with the licensing fees.

Please vote NO on HB 110.

Iris Aharonovich  
Chair - Legislative Committee

The Reflexology Association of America is the national US membership organization of reflexologists, reflexology schools, and Affiliated State reflexology chapters. Affiliated States include: Alaska, Arizona, Colorado, Georgia, Iowa, Maine, Maryland, Massachusetts, North Carolina, Ohio, Oregon, Rhode Island, Virginia, Wisconsin