



## Washington State Board of Massage

Special Meeting Agenda

April 12, 2024 | 8:00 a.m.

[Join the meeting](#)

**Or call in (audio only)** Phone number: +12532050468

Phone Conference ID: 856 6988 9836

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### Board Members

Lynna Fuller, LMT, Vice- Chair

Sherise Gueck, LMT, Massage Educator

Whitney Smith, LMT

### Program Contact

Devin Brooks, Program Manager

[massage.therapy@doh.wa.gov](mailto:massage.therapy@doh.wa.gov)

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The Board of Massage has scheduled a special meeting via **Zoom** on April 12, 2024. Notice was provided in accordance with the Open Public Meetings Act and agenda was made available online at least 24 hours prior to the start time of the meeting pursuant to [RCW 42.30.077](#).

For more information, please see the last page of this agenda.

**Please note:** Comments from the public in attendance may be solicited after each agenda item.

### Open Session

#### 1. Call to Order – Lynna Fuller, Vice- Chair

- 1.1. Introduction of board members, program staff, and guests
- 1.2. Meeting Ground Rules
- 1.3. Approval of agenda

## **2. Public Forum**

The purpose of the open forum is to provide the public an opportunity to address the board on issues of significance to or affecting massage and that are not related to topics for which a rules hearing was or will be scheduled.

Members of the public who indicate an interest in speaking may share comments at this time. The board may limit the speaker's time based on the number of people interested in speaking.

## **3. Education and Training**

3.1. The board will discuss their decision on increasing the education hours required for licensure.

## **4. Education hours received by the applicant vs education hours required by the initial state for licensure.**

4.1. The board will discuss their decision on if an applicant's education is deemed substantially equivalent if they have exceeded the hours of education required for Washington State licensure.

## **Times and Order**

Times are approximate. The meeting will continue until all agenda items are complete. This agenda schedule may change, and items may not be taken in order of the agenda.

## **Open Public Meetings Act**

This meeting is being held as a hybrid meeting in accordance with [RCW 42.30.030](#) in which the public has the option to observe and participate in the meetings of governing bodies through either real-time remote access or physical attendance at a set location.

## **Accessibility**

This meeting is accessible to persons with disabilities. Special aids and services can be made available upon advanced request. Advance requests for special aid and services must be made no later than one week before the meeting. To make such a request, you may leave a message with your request at 1-800-525-0127. If necessary, to make this call, you may access Telecommunication Device for the Deaf (TDD) TDD by calling the TDD relay service at 1-800- 833-6388 or 711. If you need assistance due to a speech disability, Speech-to-Speech provides

human voices for people with difficulty being understood. The Washington Speech-to-Speech toll free access number is 1-877-833-6341.

For future agendas and minutes, please visit the [Board of Massage webpage](#).

**Next scheduled meeting**

Date: May 3, 2024

Time: 9:00 AM

Location: Tumwater



State	Initial licensure requirement	0	500	550	570	600	625	650	700	750	1000	Not Reg
Maryland	750									1		
Massachusetts	650							1				
Michigan	500		1									
Minnesota	Not regulated											1
Mississippi	700								1			
Missouri	500		1									
Montana	500		1									
Nebraska	1000										1	
Nevada	550			1								
New Hampshire	750									1		
New Jersey	500		1									
New Mexico	650							1				
New York	1000										1	
North Carolina	500		1									
North Dakota	750									1		
Ohio	600					1						
Oklahoma	500		1									
Oregon	625						1					
Pennsylvania	600					1						
Puerto Rico	1000										1	
Rhode Island	650							1				
South Carolina	650							1				

State	Initial licensure requirement	0	500	550	570	600	625	650	700	750	1000	Not Reg
South Dakota	500		1									
Tennessee	500		1									
Texas	500		1									
Utah	600					1						
Vermont (registration required)	0	1										
Virginia	500		1									
Washington	625						1					
West Virginia	500		1									
Wisconsin	600					1						
Wyoming	Not regulated											1
	<b>Total</b>	<b>1</b>	<b>22</b>	<b>1</b>	<b>1</b>	<b>7</b>	<b>4</b>	<b>5</b>	<b>1</b>	<b>4</b>	<b>3</b>	<b>3</b>

## Overview of education/ subject hours.

### Accredited schools

Subject	A&P (90)	Kinesiology (60)	Pathology (70)	Theory & Practice (260)	Student Clinic (50)	Clinical/ Business practices (55)	Professional Ethics (40)	Other
Avg.# of Hours	104	67	72	297	84	67	40	63

\*Total average for accredited schools' education hours = 731

\*Note, "other" hours are not an average value. 2 out of 5 had "other" hours for a total of 63.

### Schools

Subject	A&P (90)	Kinesiology (60)	Pathology (70)	Theory & Practice (260)	Student Clinic (50)	Clinical/ Business practices (55)	Professional Ethics (40)	Other
Avg.# of Hours	105	77	79	282	62	63	41	197

\*Total average number of education hours = 709 (not including other hours)

\*8 out of 21 schools had "other" education hours.

\*Note, values do not include pending schools.

## **2024 Massage Programs in Washington State (From Workforce)**

<b><u>Accredited Schools</u></b>	<b><u>Hours</u></b>
American Institute of Clinical Massage	750
Arlington School of Massage	720
Elite Cosmetology, Barber & Spa Academy	750
Victoria's Academy of Cosmetology - 2	750
Zorganics Institute Beauty and Wellness	750

<b><u>Schools</u></b>	<b><u>Hours</u></b>
Advanced Bodywork Education Massage School	801
Alexandar School of Natural Therapeutics	677
Ancient Arts Massage School and Clinic	750
Basin Massage and Integrative Studies	655
Body mechanics School of Myotherapy and Massage - Tumwater	648/700
Body mechanics School of Myotherapy and Massage - Vancouver	648/700
Coeur D'Alene Massage School	650
Columbia River Institute, LLC	750
Day Spa Academy	750
Discovery point School of Massage	750
Northwest Academy for the Healing Arts - Bellingham	661/644
Northwest Academy for the Healing Arts - Seattle	661/644
Northwest Academy for the Healing Arts - Tacoma	661/644
Northwest School of Massage	650
Pacific Northwest Massage Academy	725
Port Townsend School of Massage - 2	669
Sage Academy of Massage and Bodyworks- 3	775
Seattle Clinical Massage School	705
Spectrum Center School of Massage LLC	840
Washington Spa Academy	660
West by Northwest School of Massage	915

<b><u>Pending Schools</u></b>	<b><u>Hours</u></b>
8+1 Massage Therapy Institute	780
Ambiance School of Massage	
Carrington College	765
Classic Institute of Massage	700
Therapeutic Connections School of Massage	750
Twin Rivers Therapeutic Massage Academy	930



**Accredited schools-** Meets standards set by an accrediting organization that is dedicated to ensuring academic excellence.

<https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2020-2021/vol2/ch1-institutional-eligibility>

**Pending Schools-** Schools that need re-approval.


# Workforce Board

## Private Career School Licensing Program

March 15, 2024

Darlene Bartlett  
Consumer Protection Manager


Andy Hall  
Shawna Koch  
Program Specialists



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## Negotiated Rulemaking

- In October 2023, the Department of Education passed negotiated rulemaking.
- The administration looked to enhance consumer protection for student borrowers and taxpayers from the negative effects of sudden college closures.
- Emailed schools on January 23, 2024



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## What's covered



- Financial responsibility
- Administrative capability
- Certification procedures
- Ability to benefit

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## Reduction in maximum hours

- Included in these new regulations, is a reduction in the maximum allowable hours, which used to be 150% of state minimum.
- Accredited schools currently over 625 state-minimum must update their hours to align to continue eligibility for Federal Financial Aid.
- Takes effect July 1, 2024
- Most approved massage programs exceed the 625 state-minimum.

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## Impacted Massage Schools

- American Institute of Clinical Massage – Post Falls, ID  
750 hours
- Arlington School of Massage – Arlington, WA  
720 hours
- Carrington College – Spokane, WA  
765 hours
- Elite Cosmetology, Barber & Spa Academy – Yakima, WA  
750 hours
- Victoria's Academy of Cosmetology, Kennewick, WA  
750 hours
- Zorganics Institute of Beauty and Wellness – Bellingham, WA  
750 hours

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## Staff Contact Information

<p><b>Darlene Bartlett</b> Consumer Protection Manager 360-709-4605 <a href="mailto:Darlene.bartlett@wtb.wa.gov">Darlene.bartlett@wtb.wa.gov</a></p>	
<p><b>Andy Hall</b> Program Specialist 564-200-4327 <a href="mailto:Andy.hall@wtb.wa.gov">Andy.hall@wtb.wa.gov</a></p>	<p><b>Shawna Koch</b> Program Specialist 360-870-7066 <a href="mailto:Shawna.koch@wtb.wa.gov">Shawna.koch@wtb.wa.gov</a></p>
<p><b>Hannah Bartlett</b> Administrative Assistant 360-709-4600 <a href="mailto:Hannah.bartlett@wtb.wa.gov">Hannah.bartlett@wtb.wa.gov</a></p>	

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## ADVOCATE FOR MASSAGE THERAPY AS A RECOGNIZED AND RESPECTED HEALTHCARE PROFESSION

November 14, 2017

**To:** Reynaldo Guajardo, LMP, Chair, and Members of the Board of Massage

**From:** Comments Submitted by the WSMTA Clinical Practices Program as approved by the WSMTA Board of Directors

**Re:** WSMTA Suggestions and comments on Chapter 246-830-430 Education

The Washington State Massage Therapy Association (WSMTA) recommends that:

- Washington State should mirror its massage education and training programs to the ELAP recommendations in both hours and program content (as recommended by AMTA-WA), with an additional 125 hours for a total of 750 hours.
- The additional 125 hours shall be in support of additional evaluation, clinical reasoning and treatment of patients/clients with common chronic conditions and injuries, the content is provided on pages 2-3.

### **Why WSMTA is Promoting More Hours Than ELAP:**

As stated in their final report, the ELAP objective was to:

identify and gain agreement on what should be core elements of entry-level massage therapy instructional programs – the knowledge and skills an entrant to the profession should possess to be ready to work safely and competently with clients.

WSMTA has great respect for this project and what it accomplished and we support the ELAP findings to be the base minimum we would want for Washington state massage education requirements if we were not regarded as healthcare providers in our state. Since massage therapists in Washington state are both healthcare providers and afforded the opportunity to work as providers of health insurance plans through the "Every Category of Provider" law, WSMTA believes that our state education standards should include a component over and above ELAP that educates students in the evaluation, clinical reasoning and treatment of patients/clients with common chronic conditions and injuries, but with the components of ELAP as the foundation of any massage education.

In formulating a position, WSMTA looked at what program hours current massage schools in Washington state were providing as well as the number of months they were giving students to complete them in. The table, "WA State Massage School Licensing Programs", lists the massage schools in WA state and sorts them by number of program hours. We also compiled a chart to see what other states had for minimum massage licensing requirements. Please see the table, "State Massage Licensing Requirements" for a listing of states and their minimum hours of massage education for licensure.

## The Breakdown of Washington State Massage School Hours and National Minimums

The "WA State Massage School Licensing Programs" table shows that:

- 15 of the 27 massage schools (55.6%) offer 750-hour or higher programs and would only have to conform their content
- 5 of the 27 massage schools, (18.5%) are below the 625-hour ELAP requirement
- 7 of the 27 massage schools (25.9%) are between 625 hours and 749 hours and would have to add not more than 125 hours of content (one school would only need to add 10 hours so it is a wide mix).

The "State Massage Licensing Requirements" table, shows that there are currently only 6 states that have a minimum of 750 hours or higher out of 50. On the other hand there are only 11 states that have 625 hours or higher out of 50. So whether Washington state has a minimum of 625 hours or 750 hours, the impact on portability will be about the same as most states have a 500 hour minimum requirement.

### Why WSMTA is Advocating 750 hours:

*WSMTA advocates that 125 hours is the bare minimum, over ELAP's 625 hours, to produce massage therapists who can treat patients/clients with common chronic conditions and injuries and do no harm on the general public in a healthcare environment.* This is not ideal, it is minimal. The content of the 125 hours was created and reviewed by members and non-members of the WSMTA involved in education with decades of experience in creating curriculum.

The quantity of 125 hours as a minimal number was deemed to be:

- the minimum education required to learn evaluation, clinical reasoning and treatment skills over and above a minimum massage skill level provided by the most base education to treat the clients/patients without doing harm -- **note: approximately 81% of Washington state massage schools are already at a base minimum of ELAP's 625 hours when the state minimum is currently only 500 hours.** This says something about the current minimum of education hours if the vast majority of schools voluntarily offer more than the minimum required. And,
- the least financially burdensome to DOH, schools and potential students as 55.6% of schools are already at or above 750 hours, and it would also increase the amount of federal financial aid available to students to cover the tuition of students at the school with 751-1000 hour programs (currently with a 500 hour minimum, students can only obtain federal financial aid for 750 hours).

### WSMTA's Breakdown of the Additional 125 Hours:

WSMTA supports AMTA-WA's adaptation of the 625 hours that they provided in their proposed WAC rewrites for the September 7 Spokane BOM Meeting. Their wording modifies ELAP to fit the state's requirement of clinic hours. From this base, we added 125 hours and added minimums in each section that equals this 125 hours to ensure that the integrity of the 125 hours is maintained and used for the purpose intended instead of being co-opted into other programs.

This 125 hours is for massage school students to learn the assessment, clinical reasoning and treatment of common musculoskeletal pathologies, including but not limited to tendinopathies, strains, sprains and impingement syndromes throughout the body. The 125 hours includes:

- Anatomy and Physiology: 20 hours – regional anatomy, nervous system physiology (general senses, pain), inflammatory process.
- Kinesiology: 15 hours – location and palpation of bony structures, muscles/ligaments and tendons as well as ranges of motion and analysis of function.
- Pathology: 20 hours – common pathologies, contra-indications, cautions, clinical reasoning, relevant research.

- Theory Principles and Practice of Massage: 70 hours – overview of treatment methodology, evaluation techniques, clinical reasoning, technique practice, charting, hydrotherapy.

Note: the items listed in each category is only a suggestion of what could be included in the gross breakdown of hours into 4 main categories. We do not recommend that these items be included in any WAC language.

### WSMTA's WAC 246-830-430 Recommended Language Changes:

- The Original WAC is in Blue
- AMTA-WA suggested changes and deletions are in Green and underlined
- WSMTA's changes and deletions are in Red and italicized and bolded

Wherever AMTA-WA's changes/deletions/comments remain, WSMTA supports them and left them in the wording instead of sticking to the original WAC text. The base 625 hour breakdown provided by AMTA-WA remains the same without change, we have simply added our breakdown of 125 hours by category to the AMTA-WA breakdown. To reiterate what was stated in the prior section, we used the minimum hour language to insure that the 125 hours were used for the purpose intended instead of being co-opted into other programs.

#### **WAC 246-830-430 Education and Training.**

(1) A massage school, massage program or apprenticeship program ~~education and training~~ must have a curriculum and system of education and training consistent with its particular area of practice. The education and training in massage therapy will consist of a minimum of ~~five~~ **seven** hundred ~~and fifty~~ hours. An hour of education and training is defined as fifty minutes of actual instructional time. Certification in American Red Cross first aid and American Heart Association CPR or the equivalent is required. CPR training must be in person. This requirement is in addition to the ~~five~~ **seven** hundred ~~and fifty~~ hours of education and training in massage therapy. These ~~five~~ **seven** hundred ~~and fifty~~ hours are not to be completed in less than ~~six~~ **nine** months and must consist of the following:

(a) ~~One hundred thirty~~ **Eighty One** hundred hours of anatomy; ~~and physiology;~~ to include orientation to the human body, and the integumentary, skeletal, fascial, muscular, nervous, cardiovascular and other body systems. and kinesiology including palpation, range of motion, and physics of joint function. There must be a minimum of forty hours of kinesiology. **A minimum of 20 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(b) ~~Seventy Eighty five~~ hours of kinesiology to include muscle identification and palpation, location and attachment(s), actions, identifications and palpation, actions, range of motion, and joint classification and function. **A minimum of 15 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(bc) ~~Fifty~~ **Seventy Ninety** hours of pathology ~~including to include~~ indications, cautions, and contraindications common pathologies and the impact of massage on those pathologies. consistent with the particular area of practice. (AMTA-WA Note: The word "cautions" is used in the definition of "evaluation." It has a different meaning than "contraindications" and we recommend including it in the rules in several places for consistency. We emphasize this point, because the Board rejected our suggestion during previous rule-making.) **A minimum of 20 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(ed) ~~Two hundred fifty~~ ~~sixty five~~ **Three hundred twenty five** hours of theory, principles, and practice of massage to include ~~techniques, remedial movements~~ history of massage, benefits and effects, techniques and strokes, body mechanics of the therapist, application methods and styles, concepts of basic research, session planning and the impact adaptation of techniques, stages of healing, common pathologies, and considerations relevant to special populations on pathologies. A maximum of fifty of these hours may include time spent in a student clinic. Hydrotherapy must be included when consistent with the particular area of practice. **A minimum of 70 hours must be used as part of a program for the evaluation, clinical reasoning of treatment of common injuries and chronic conditions.**

(e) Fifty hours of mandatory student clinic to be directly supervised as defined in WAC 246-830-005(9), with a ratio of no more than one instructor to six students administering massage. For those education and training programs beyond 625 hours, in no case may the number of student clinic hours exceed 100.

(AMTA-WA Note: We included this language on the limitation on student clinic hours for the protection of students.)

(ef) ~~Fifty-Five~~ Sixty hours of clinical/business practices, at a minimum to include hygiene, sanitation, draping, recordkeeping, billing and insurance concepts, medical terminology, professional ethics, business models and management, human behavior, client or patient interaction, and state and local laws relevant to massage and massage businesses.

(g) Forty hours of professional ethics to include the therapeutic relationship of the massage therapist and client or patient, human behavior, communication skills, professional boundaries, standards of ethical practice, and state laws and rules related to massage and health care ethics.

(2) To receive credit in an apprenticeship program for previous education and training, this education and training must have been completed within the five-year period prior to enrollment in the apprenticeship program.


~~(3) A student attending a massage school, massage program, transfer program or apprenticeship program outside the state of Washington must pass a jurisprudence exam. (AMTA-WA Note: This is a confusing and unnecessary subsection. The bottom line is that passage of a jurisprudence exam is required for all applicants for licensure.)~~

(4) A massage school, massage program, transfer program or apprenticeship program may exempt a student from curriculum requirements and grant credit or clock hours when the student's successful performance on an examination that the massage school, massage program, transfer program or apprenticeship program administers demonstrates that the student has attained competency in that subject area as a result of prior postsecondary learning or training. Any credits or clock hours granted pursuant to this subsection must be retained in the students record.

Thank you for your consideration,



Robbin Blake, LMP WSMTA Clinical Practices Program Member



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

**Table A: Washington State Massage School Programs**  
as of 10/29/17

#	Massage School	Location	Hours	Months	Notes
1	Cortiva Institute	Seattle & Federal Way	1000	10-17	
			750	7.5-12	
2	Renton Technical College Massage Program*	Renton	990	9	
3	Sage Academy of Massage and Bodyworks	Moses Lake	900		
			740	7	
4	Victoria's Academy of Cosmetology	Kennewick	945	10	
5	Whatcom Community College*	Bellingham	858	8	
6	Carrington College – Spokane*	Spokane	786		
7	Alterius formerly Everest College	Everett & Tacoma	780/750	9	
8	Altura College	Tacoma	750	9	
9	Ancient Arts Massage School Clinic	Richland	750	7.5?	
10	Columbia River Institute of Massage Therapy	Wenatchee	750	10	
11	Day Spa Academy	Yakima	750		
12	Discoverypoint School of Massage	Seattle	750	12	
13	Elite Cosmetology Barber and Spa Academy	Yakima	750	6	
			650	10	
14	Inland Massage Institute, Inc.	Spokane	750	12	
15	Soma Institute of Neuromuscular Integration	Buckley	750		
16	Spectrum Center School of Massage	Lake Stevens	740	10	
17	Alexandar School of Natural Therapeutics	Tacoma	706	11	
18	Denton Massage Program	Marysville	700	10.5	
19	Clover Park Technical College*	Lakewood	660	6	Swedish AA Degree Clinical (in addition to Swedish)
	Note: Clover Park has 3 programs in massage but only CEUs were provided, not hours.				
20	Bellevue Massage School	Bellevue	651	7	
21	Port Townsend School of Massage	Port Townsend	650	9	
			525	14	
22	Northwest Academy for the Healing Arts	Seattle, Tacoma & Bellingham	644	7	
			590	9	
			574	12	
23	Bodymechanics School of Myotherapy and Massage	Tumwater & Vancouver	600	8/12	
24	Tri-City School Of Massage	Kennewick	572		
25	Wellness Education Center	Spokane	608	9	
26	Ananda Massage Training	Mountlake Terrace	510	6	
27	Rainier Massage Academy	Seattle	500		

Note: The information gathered for this report is primarily from school websites and online catalogs. Not all schools displayed their program hours or length of program in their online documentation. In those instances, where online information was unavailable, information was taken from the DOH's website section for massage therapy, where approved schools and their program hours were listed.

\* The community colleges had their programs listed in CEUs. 1 CEU of class time generally equals 20 clock hours but unfortunately, hands on technique does not, so it is impossible to tell what their actual hours were unless they also provided clock hours on their website which a several did. Hours not gathered from community college websites, came from DOH's approved massage school listings.

The link for the DOH's approved massage school webpage is:

<https://www.doh.wa.gov/LicensesPermitsandCertificates/ProfessionsNewReneworUpdate/MassageTherapist/EducationRequirements/ApprovedSchools>

**Table B: State Massage Licensing Requirements**  
as of 10/29/17

State	Min Lic'g Hrs	Notes	State	Min Lic'g Hrs	Notes
Maryland****	600hrs + 60CE	LMP	Delaware	500	MT
or,	600	RMP	or,	200	CMT
Nebraska	1000		Florida	500	
New York	1000		Georgia	500	
New Hampshire**	750		Idaho	500	
North Dakota*	750		Indiana	500	
Ohio	750		Louisiana	500	
Arizona	740		Maine	500	
Mississippi**	700		Michigan	500	
Alabama	650		Missouri	500	
Massachusetts	650		Montana	500	
New Mexico	650		Nevada	500	
Oregon	625		New Jersey	500	
Illinois	600		North Carolina	500	
Iowa	600		Oklahoma	500	
Kentucky	600		Rhode Island**	500	
Pennsylvania	600		South Carolina	500	
Utah	600		South Dakota	500	
Wisconsin	600		Tennessee	500	
Hawaii	570		Texas	500	
Alaska*	500		Virginia	500	
Arkansas	500		Washington	500	
California	500		West Virginia	500	
Colorado	500		Kansas	None	
Connecticut	500		Minnesota	None	
DC	500		Vermont***	None	
			Wyoming	None	

\* Require CPR in addition to hours

\*\* Requires CPR/First Aid in addition to hours

\*\*\* Varies by municipality

\*\*\*\* LMP in Maryland is 600 hours of massage School and 60 CE units at college for an associates degree

Note: Most of this information is from the AMTA National website. Several states were missing to include several states with licensing requirements. Information from missing states with licensing requirements was taken from the respective state's board of massage or equivalent.





MASSAGE THERAPY ASSOCIATION

ADVOCATE FOR MASSAGE THERAPY AS A RECOGNIZED AND RESPECTED HEALTHCARE PROFESSION

**Date:** November 8, 2023

**To:** Heidi Williams, LMT, Chair, and Members of the Board of Massage (BOM) and the Massage Therapy Section of the Department of Health

**From:** Robbin Blake, LMT, WSM TA Board Member, Government Relations Director, ([rblake@mywsmta.org](mailto:rblake@mywsmta.org))  
Marybeth Berney, LMT, WSM TA President, Government Relations Member, ([mberney@mywsmta.org](mailto:mberney@mywsmta.org))  
Stephanie Dickey, LMT, WSM TA Board Member, Government Relations Member, ([sdickey@mywsmta.org](mailto:sdickey@mywsmta.org))

**re:** WSM TA Comments -- Licensing by Endorsement – 11/9/23 Board of Massage (BOM) Meeting

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#### Summary of WSM TA's Recommendations on Licensure by Endorsement:

- Which state to choose? RCW 18.108.095 (full language is on page 2) only requires that the applicant's state have equivalent examination and educational requirements to Washington State, but WAC 246-830-035 (1)(a)(i) ties it to the graduation state and makes it about the school. WSM TA believes that either the graduation state or the state of current license could be used if one state but not the other matches Washington's educational requirement. If the applicant graduated from a state requiring a 625-hour minimum but they currently reside and are licensed in a 500-hour state, then the graduation state could be used. Or, if an applicant's current state has a 625-hour minimum educational requirement then that state could be used if they graduated from a 500-hour state. They had to meet the current's state's educational requirements to get licensed so they shouldn't be penalized if Washington state only looks at the graduation state.
- What is substantially equivalent? The Board of Massage has previously determined that an education of at least 500 hours of massage education and training plus 2 years work experience is substantially equivalent to coming from a state that has a 625-hour minimum state requirement. *If this is the case, then why doesn't the board simply make a determination that coming from a state with a 500-hour minimum massage education requirement and actually having a 625 hour or greater massage education and training is also substantially equivalent?* WSM TA strongly recommends that you do so.
- At the end of the memo, we provide a recommendation on how to revise WAC 246-830-035 to streamline the language to make it less likely to be misinterpreted if the Board decides to keep the WAC mostly intact.

The remaining body of this memo provides the details behind our recommendations.

#### Conundrums Created by RCW 18.108.095 "Out-of-state massage therapist applicants"

Regardless of what we might want in our Licensure by Endorsement WAC, there is an RCW that provides guidance on this subject. RCW 18.108.095 "Out-of-state massage therapist applicants" states the following:

*"A massage therapist applicant holding a license in another state or foreign jurisdiction may be granted a Washington license without examination, if, in the opinion of the board, the other state's or foreign jurisdiction's examination and educational requirements are substantially equivalent to Washington's. However, the applicant must demonstrate to the satisfaction of the board a working knowledge of*

Washington law pertaining to the practice of massage. The applicant shall provide proof in a manner approved by the department that the examination and requirements are equivalent to Washington's."

Which state is being referred to -- the state the applicant graduated from or the current state the license is held in?

### WSMTA's Recommendation – Which State?

WSMTA believes that if a massage therapist graduated from a state with 625 equivalent hours, that the graduation state should be used for evaluation purposes by DOH for Licensing by Endorsement. Or, if a massage therapist graduated from a state of less than 625 hours, but currently resides in a state that requires 625 hours of equivalent hours and holds a license in good standing from that state, the current state should be used for evaluation purposes. The reason for this is if a massage therapist graduated from a state that had less than 625 hours for an educational requirement, but then later moved to a state that had 625 hours, this massage therapist already jumped through hoops to get licensed in the state of 625 hours. If Washington state only looks at the state of original licensure and not also at the state of current licensure, we are then making that massage therapist applicant jump through an additional set of hoops for no particular purpose as they have satisfied the 625-hour educational requirement in another state.

### WSMTA's Recommendation – What is Substantially Equivalent?

The Board of Massage has previously determined that an education of at least 500 hours of massage education and training plus 2 years work experience is substantially equivalent to coming from a state that has a 625-hour minimum state requirement. *If this is the case, then why doesn't the board simply make a determination that coming from a state with a 500-hour minimum massage education requirement and actually having a 625 hour or greater massage education and training is also substantially equivalent?* WSMTA strongly recommends that you do so.

### WSMTA's Recommendation if the BOM Decides to Not Make Any Changes to WAC 246-830-035:

At a minimum, WSMTA feels that the BOM should clean up this WAC to create a clearer understanding of what is required. Here is our proposal if no other changes are made. We did make one material change and that was to the original subsection (1)(a)(i) in consideration of an LMT coming from a state with an equivalent educational requirement.

- (1) A massage therapist applicant holding a massage license in another state or foreign jurisdiction may be granted a Washington massage license if:
  - (a) ~~(2)~~ The license is in good standing as verified by the appropriate jurisdiction.
  - (b) ~~(3)~~ The applicant ~~must have~~ **has** successfully passed one of the following examinations:
    - (i) ~~(a)~~ Federation of State Massage Therapy Boards massage and bodywork licensing examination;
    - (ii) ~~(b)~~ National certification examination for therapeutic massage and bodywork; or
    - (iii) ~~(c)~~ A board-approved examination.
  - (c) ~~(4)~~ The applicant ~~must satisfy~~ **satisfies** the requirements in WAC [246-830-020](#) (1)(a) through (h).
  - (d) ~~(a)~~ The board determines the other state's, territory's, or foreign jurisdiction's education and training requirements are substantially equivalent to Washington's. ~~Substantial equivalency means a course of study at a massage school or massage program that requires:~~ **Substantial equivalency means:**
    - (i) A minimum **state educational requirement of either the state of graduation, or the state currently licensed in,** of six hundred twenty-five hours of education and training **that is substantially equivalent to the education required in WAC 246-830-475,** to be completed in no fewer than twenty-four weeks ~~and approved by the equivalent licensing agency or agencies in the state, territory, or foreign jurisdiction in which it is located at the time of applicant's graduation;~~ or
    - (ii) A minimum of five hundred hours of education and training; and approved by the equivalent licensing agency or agencies in the state, territory, or foreign jurisdiction in which

it is located at the time of applicant's graduation, [with](#) at least two years of experience, and documentation of at least twenty-four hours of continuing education [as required in WAC 246-830-475](#) within two years prior to making application.

(e) ~~(2)(e)~~ If there is a gap in practice of three or more years immediately prior to applying for a license by endorsement, the applicant must provide documentation of twenty-four hours of ~~hands-on~~ continuing education [as required in WAC 246-830-475](#) ~~of massage therapy~~ for the two most recent years prior to making application.

(2) If an applicant does not meet the requirements of this section, then the applicant may fulfill the remaining education and training requirements as outlined in WAC [246-830-037](#).

Thank you for your consideration.