

To assist us in responding as quickly and comprehensively as possible, please include the following information.

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I am the government relations director for Associated Bodywork & Massage Professionals (ABMP), the largest massage therapy association in the country. I've been in touch before regarding previous bills you have authored. I represent more than 80,000 members nationwide, **including more than 1200 who reside in Maryland.**

**I also want to make clear that I am happy to travel to Maryland and participate in any discussions related to the bills that affect our members. I will be putting forth a new concept below and I would look forward to being present and engaged if you decide it is a feasible proposal.** I am also copying the AMTA Maryland Chapter on this email since I firmly believe in transparency and working together.

**HB 1157** ABMP supports the addition of a background checks for new massage therapy applicants, however, we oppose the idea of further complicating the licensing requirements.

Why not take advantage of this motivation to change the licensing requirements to eliminate the 2-tiered regulatory system? Just because it's been done this way for so long doesn't mean it has to continue. I was not present when this initial 2-tiered regulatory system was implemented so I am not aware of why there is an additional 60 hour higher education requirement in order to become licensed as a massage therapist and practice in a health care facility. What I do know, is that there is not currently, nor has there been in the past, a requirement that the 60 additional hours completed in higher education relate to health care or to massage therapy.

Therefore, a person holding the LMT credential does not necessarily possess knowledge that makes them more qualified to work in a health care facility than someone holding the RMT credential. It only means the LMT has the same massage therapy education and some college credits. I don't know how this is serving to "protect" the public. In my opinion, it is actually counterproductive and has wrongly given the public the impression that the types of massage performed in other environments is not a health care service. All massage therapy is health care, regardless of the office setting.

While I appreciate the vision behind HB 1157 attempting to make the 60 hour higher education requirement relevant to some extent, it's still an unnecessary requirement that makes no practical sense. **Instead of further complicating the 60 hour requirement I suggest it be eliminated.**

If Maryland is interested in changing the law regulating massage therapists, I suggest you base those changes on actual research. The Entry-Level Analysis Project (ELAP) is a research project that was initiated by the Coalition of National Massage Therapy Organizations (the seven primary national massage organizations) to address what core, entry-level massage therapy education should be. The primary objective of the project was to come up with a defensible minimum number of hours schools should teach to prepare graduates for safe and competent practice.

**ABMP supports the findings of ELAP and would support a bill changing Maryland's education requirement to 625 hours.** We would **not** support a new tiered regulatory system or additional random higher education hours. I am advocated for one licensed massage therapist credential that requires *new* applicants, to complete a minimum 625 hour massage program. All practitioners currently regulated, regardless of their credential, would automatically become LMT's upon the effective date of the Act. A few other considerations should be made for students currently enrolled in massage programs and for massage therapists moving to the state who may not possess 625 hours from one school but do likely possess at least 625 hours in combination with their core hours, continuing education courses, and professional experience. These are details that can be evaluated and worked out if you are interested in pursuing this idea.

Adopting one credential would serve at least 3 key purposes:

1. It would provide one clear title for the public.
2. It would streamline administrative procedures for the Board staff. They would no longer have to differentiate between two types of applicants.
3. It would increase the entry-level hours. Obviously increasing the hours has become a priority for an organization or person behind this bill. My recommendation would increase the hours in a relevant and defensible way and the law would be streamlined to one credential.

The ELAP recommendation includes content focus and allocation, not just total education hours. ABMP would advocate for those recommendations to be adopted by the Board during the rule process. I am happy to provide more information at your request. Here is a link to the final ELAP report [http://www.elapmassage.org/final\\_report.php](http://www.elapmassage.org/final_report.php)

With regards to **HB 1156**, I am concerned about the intention to require certification from private organizations in order to be exempt from massage licensing. Is the intent to have the Board of Chiropractic and Massage Therapy Examiners verify individual certifications in order for the practitioner to be exempt? Or will the certifications simply be viewed if there is a complaint or problem. I don't understand the intent behind this bill.

Thank you for your consideration of ABMP's concerns. I look forward to hearing from you.

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