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May 21, 2008

Delaware Board of Massage and Bodywork
c/o Nancy Fields
861 Silver Lake Boulevard
Dover, DE 19904

Dear Members of the Board:

Associated Bodywork & Massage Professionals (ABMP) is a professional membership association founded in 1987 to provide massage and bodywork practitioners with professional services, information, and public and regulatory advocacy. ABMP's current membership totals more than 64,000, including more than 270 members in Delaware.

ABMP has reviewed the proposed regulations being considered by the board and has identified a few areas of concern. We have specific concerns regarding the exam designated by the board, along with the approval of continuing education courses.

Examination language

According to Delaware law, the board has the responsibility (§ 5306. Powers and duties (3)) to designate a written exam to be used as a tool to determine entry-level competency for licensure. The board currently recognizes only the exams provided by the National Certification Board for Therapeutic Massage and Bodywork (NCBTMB).

As of October 2007, the massage profession now has an additional examination that states may utilize in their licensing process. The Massage & Bodywork Licensing Examination (MBLEx), offered by the Federation of State Massage Therapy Boards (FSMTB), gives state massage boards direct control over the design and administration of the competency exam that is specified as a requirement for licensure. Currently, sixteen states already recognize passage of the MBLEx as qualification for licensure; the Florida Massage Therapy Board has voted to use the MBLEx exclusively beginning in May 2009. ABMP encourages Delaware to consider recognizing it as well. The MBLEx is the first licensing examination designed for the massage profession, and is administered by the state massage boards through FSMTB.

Many schools across the country have contacted ABMP to relay concerns with the examination process conducted by NCBTMB. The NCBMTB candidate approval process has been chronically slow since its inception in 1992, but more recently educators have registered concern with NCBTMB's November 2007 decision to accept up to 300 hours of distance learning as part of the 500 hours required for national certification, as well as the delays caused by a switch to a new exam provider.

During the transition period before this date, NCBTMB did not send the previous testing service eligibility information, making applicants wait more than a month until the new testing company took over the contract, in order to be processed and assigned an exam date. This directly and negatively impacted massage therapy students in Delaware and other states, as those who graduated at the end of November or in December were delayed sitting for any exam because the Delaware Board recognizes only NCBTMB exams.

We encourage the Board to thoughtfully consider following the lead of Florida, Arkansas, and Oregon by establishing the MBLEx as the preferred examination for licensure candidates in Delaware; absent that decision, at a minimum the board should allow candidates a choice to sit for either the MBLEx or the NCBTMB exam(s).

Continuing Education Requirements

ABMP is also concerned with the number of continuing education hours and the proposed language attempting to distinguish between core courses and elective courses. The purpose of continuing education should be continued competency for the protection of the public, not professional development. Much of massage therapy continuing education that is offered is technique based. Should massage therapists keep up with contraindications of massage and review intake and health history information? Yes. Do all massage therapists need to be mandated to learn new massage techniques? No.

ABMP recommends decreasing the continuing education mandate by half; we believe adequately ensuring professional competence can be achieved in half the currently mandated hours. We encourage you to establish a 12 hour requirement for a massage therapist per biennial renewal period, and a 6 hour requirement for massage technicians per biennial renewal period.

In Section 7.4.1, NCBTMB and the American Massage Therapy Association (AMTA) approved CE courses are automatically approved for content. We would like to request that programs approved by ABMP should also be recognized under 7.4.1 in the proposed rules.

Thank you for your consideration of ABMP's views. If you have any questions please do not hesitate to contact me at jean@abmp.com or 800-458-2267 extension 645.

Sincerely,

Jean Robinson
Government Relations Director