

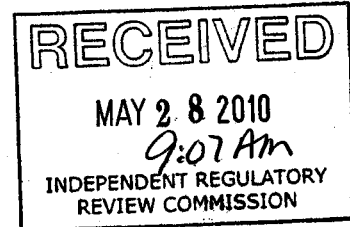


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May 15, 2010

Judy Harner, Board Administrator,  
State Board of Massage Therapy  
PO Box 2649  
Harrisburg PA, 17105-2649



RE: 49PA. Code CH 20- Public Comments

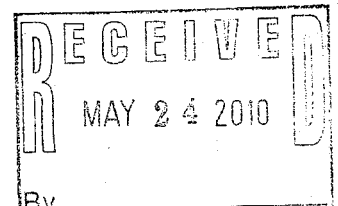
Dear Ms. Harner:

First, I would like to commend the board for your proposed rule regarding continuing education. There is a growing acknowledgement throughout the United States of how important continuing education is for a licensee.

However, I would like to express a few concerns with the Board and share some of our experiences in helping licensees fulfill their requirements in other states. We agree with you that some hours in the profession of Massage Therapy should be hands on, but believe you should consider allowing at least one half (12 Hours) to be completed by correspondence. Attached is table showing the required hours currently required in other states and the method in which licensees may complete hours. As you can see a vast majority of states with existing massage therapy continuing education rules allow the licensees to complete at least half their hours by correspondence.

Even at half the hours we found the following issues in other states you may want to consider:

- 1) Classroom hours are very expensive, so you may be placing an additional financial burden on licensees during a time when most are struggling financially. Correspondence is much more economical.
- 2) It is human nature to complete your continuing education at the very last minute. We have found in larger states like Florida that licensees wait until the last 3 months and then discover it is difficult to find classes necessary to fulfill their hours in this time-frame.
- 3) For licensees who reside outside the state, but want to keep their license active it is also difficult to find classes without expensive and, often extensive travel.



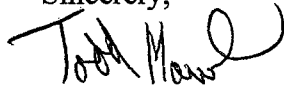
- 4) Licensees have shared with us many cases of personal hardship such as caring for ill family members or fighting cancer. For most, it is virtually impossible for them to travel and attend a 3 day class, so many choose not to renew license. Through correspondence, they would have the ability to complete hours in the comfort of their own home.
- 5) Compliance by the use of audits can be troublesome. If the sampling set prescribed is too small, it can place an unfair burden on the licensees that have spent the money and followed the rules. The board may want to consider a company like CEbroker ([www.cebroke.com](http://www.cebroke.com)). The company does not charge a fee to the board, but keeps track of CE hours. The board could then require all providers to report licensee hours to CEbroker. This would allow the Board to do 100% audit of all the licensees who have not had hours reported. The Florida Department of Health has contracted with them for nearly 10 years and the system works well.

Finally, I have attached an article regarding a study completed by the United States Department of Education, which indicates that students actually learn more from distance courses than classroom.

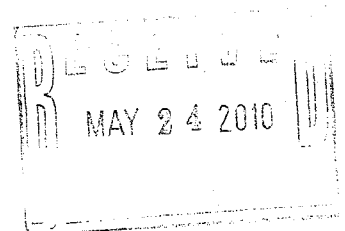
Our company offers both correspondence and classroom education throughout the United States and we look forward to helping your licensees fulfill their required hours. We hope that you will consider the concerns that licensees in the massage therapy profession have relayed to us and perhaps consider amending the rule.

Please feel free to contact me should you have any questions.

Sincerely,



Todd Mowl  
CEO



<i>Massage State CE requirements</i>		
<i>2009/2010</i>	<i>hours/exp date</i>	<i>hours allowed</i>
<i>State</i>	<i>how often</i>	<i>to be online</i>
Alabama	16 hrs / 2 yrs	16
Arkansas	6 / yrly	0
Arizona	25 / 2 yrs	12
Connecticut	24 / 4 yrs	6
Delaware	LMT 24 / 2 yrs CMT 12 / 2 yrs	3
Florida	24 + HIV / 2yrs	12 + HIV
Georgia	24 hrs / 2 yrs	12
Illinois	24 hrs / 2 yrs	12
Iowa	24 hrs / 2 yrs	6
Kentucky	24hrs/2yrs	24
Louisiana	12 / yearly	12
Maryland	24 hrs / 2 yrs	24
Mississippi	12 + CPR / yrly	3
Missouri	12 hrs/2 years	12
NCBTMB	48 hrs /4 years	48
Nebraska	24 / 2 yrs	10
Nevada	12/yrly	12
New Hampshire	12 hrs/2 yrs	12
New Mexico	16 hrs / 2 yrs	16
North Carolina	24 / 2 yrs	12
North Dakota	18 / yrly	6
Oregon	25 + CPR / 2 yrs	13
Pennsylvania	24 hrs	?
S Carolina	12 hrs / 2 yrs	12
S Dakota	8 hrs / 2yrs	4
Tennessee	25 hrs / 2 yrs	25 (2 hrs TN statutes)
Texas	12 hrs / 2 yrs	12
Virginia	25 hrs / 2 yrs	25
Washington	16 hrs / 2 yrs	0
Washington DC	12 hrs / 2 yrs	6
W Virginia	24hrs/2yrs	24

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MAY 24 2010

August 19, 2009, 1:08 pm

## Study Finds That Online Education Beats the Classroom

By *STEVE LOHR* - Bits

*Update | 11:08 p.m. Read an article by Steve Lohr on keeping abreast of innovation in the Continuing Education special section.*

A recent 93-page report on online education, conducted by SRI International for the Department of Education, has a starchy academic title, but a most intriguing conclusion: “On average, students in online learning conditions performed better than those receiving face-to-face instruction.”

The report examined the comparative research on online versus traditional classroom teaching from 1996 to 2008. Some of it was in K-12 settings, but most of the comparative studies were done in colleges and adult continuing-education programs of various kinds, from medical training to the military.

Over the 12-year span, the report found 99 studies in which there were quantitative comparisons of online and classroom performance for the same courses. The analysis for the Department of Education found that, on average, students doing some or all of the course online would rank in the 59th percentile in tested performance, compared with the average classroom student scoring in the 50th percentile. That is a modest but statistically meaningful difference.

“The study’s major significance lies in demonstrating that online learning today is not just better than nothing — it actually tends to be better than conventional instruction,” said Barbara Means, the study’s lead author and an educational psychologist at SRI International.

This hardly means that we’ll be saying good-bye to classrooms. But the report does suggest that online education could be set to expand sharply over the next few years, as evidence mounts of its value.

Until fairly recently, online education amounted to little more than electronic versions of the old-line correspondence courses. That has really changed with arrival of Web-based video, instant messaging and collaboration tools.

The real promise of online education, experts say, is providing learning experiences that are more tailored to individual students than is possible in classrooms. That enables more “learning by doing,” which many students find more engaging and useful.

“We are at an inflection point in online education,” said Philip R. Regier, the dean of Arizona State University’s Online and Extended Campus program.

The biggest near-term growth, Mr. Regier predicts, will be in continuing education programs. Today, Arizona State has 5,000 students in its continuing education programs, both through in-person classes and online. In three to five years, he estimates, that number could triple, with nearly all the growth coming online.

