

3203

From: Phil & Beth Fisher
To: ST. Regulatory Counsel
Subject: Regulation #16A-724 (IRRC #3203)
Date: Tuesday, July 3, 2018 10:01:21 AM



Jacqueline A. Wolfgang, Assistant Counsel
Department of State
P.O. Box 69523
Harrisburg, PA 17106-9523

Dear Members of the PA Board of Massage Therapy,

I have read through the proposal for Regulation #16A-724 and I understand the need to increase revenue to balance expenditures. However, I also agree with the AMTA PA's opinion that the increase in the biennial renewal fee may cause a hardship for some massage therapists. In my opinion, this hardship pertains not only to those who practice part-time, but also to LMTs in rural areas where salaries are low, employment opportunities are limited, and continuing education usually involves extensive travel that results in lost income due to travel expenses and forfeited work hours. May I suggest a possible action that could mitigate the economic impact of the increased fees on the LMT while maintaining the revenue for the State Board of Massage Therapy? My suggestion is to amend the CE policy to allow more credits from professional online courses to be utilized to meet the required 24 CE hours.

Currently, 16 hours of the required 24 hours of Continuing Education per reporting period must be in a hands-on format. Reducing the hands-on requirement would have little effect on your revenue since, as stated in the proposal to the IRRC, the projected revenue during the 2019 biennial registration is expected to be \$1,094,250 from license fees; \$35,000 from initial applications; but only \$650 from CE provider applications. However, a more lenient allowance for non-hands-on education would have the potential to significantly reduce the financial burden for individual LMTs, and could offset the cost of the license fee increase. Most of the independently employed LMTs of my acquaintance obtain their liability insurance through one of the massage professional organizations. In addition to insurance, one of the benefits of professional membership is free, online, continuing education. Although I can only count 8 hours toward my required 24, I have taken many more hours of courses offered through ABMP because the courses are interesting, informative, and timely. The educational quality is top-notch. I can say this with some authority because I am an NBCTMB Approved provider, I have a Masters degree in Adult Education from Penn State, and am a Registered Nurse and an American College of Sports Medicine Certified Exercise Physiologist.

The hands-on requirement has been especially expensive for LMTs in the northern counties of the state because, other than the few courses I offer, there are almost no CE opportunities within driving distance for a one-day

commitment. Massage therapists on the NY-Penn border used to be able to attend courses in Ithaca, Rochester, and Syracuse, NY but New York State CE courses are now open only to participants who hold NYS licenses, and formal CE workshops and classes in Pennsylvania are offered primarily in the populated, southern areas of the state.

Of the 8,754 LMT registrations that you expect to receive in 2019, I know that less than 2% of them will likely come from the northern counties of Pennsylvania, but accepting more CE hours from online courses would benefit all Pennsylvania LMTs by offering them an opportunity to balance their business expenditures while at the same time, maintaining the increased revenue to the licensing Board. Massage is a hands-on profession, and as such, I understand the priority for continuing education presented in the same format. As an educator, though, I am completely confident that licensed professionals can safely and effectively learn through the online platform. I encourage participants in my workshops to take full advantage of the courses offered through their professional memberships. Learning styles vary and online programs are not ideal for everyone. Even those problems can be bridged, though; for example, colleagues can get together to take some courses cooperatively thus adding a hands-on practicum. While I feel it is appropriate for the Board to express a preference for hands-on CE courses, I encourage you to accept more pre-approved, online courses, too. The PA State Boards for Medicine and Nursing place no limits on the number of online credits that are accepted to meet CE requirements; I urge the Board of Massage Therapy to similarly value non-traditional education. As a first step, I propose that the hands-on requirement be reduced to 8 hours, allowing LMTs to earn 8 more CEs online. Based on an estimated cost of at least \$160 for an 8 CE hands-on class, plus travel expenses and income forfeited to lost work hours, this amendment to the CE policy potentially more than negates the economic hardship created by the \$125 increase in the license renewal fee.

I appreciate the opportunity to add my input. Thank you for considering my suggestion.

Sincerely,

Beth Fisher

(M.) Beth Ryan Fisher, RN, LMT
PA # MSG000034

"Beth Ryan Fisher is approved by the National Certification Board for Therapeutic Massage & Bodywork (NCBTMB) as a continuing education Approved Provider and is also sponsored by NCBTMB to teach New York LMTs continuing education that is accepted by the state of New York for license renewal." Approved Provider # 451913-