



Coalition of Massage & Bodywork CE Instructors

August 15, 2015

Rules Review Commission
1711 New Hope Church Rd.
Raleigh, NC 27609

Dear Commission Members,

The *Coalition of Massage & Bodywork CE Instructors* is an informally structured group of massage and bodywork continuing education instructors based in North Carolina. Our primary mission is to keep North Carolina massage & bodywork continuing education instructors informed and influence the standards of continuing education. We have occasional meetings when we see the need, and communicate regularly through email. Representatives of our group attend the NC *Board of Massage & Bodywork Therapy* meetings and we provide input to the Board on issues that we feel are important to the profession.

We would like to express our concerns about the permanent rule change submission regarding the designation of Approved Providers for Continuing Education, specifically 21 NCAC 30 .0702 (7). This rule is scheduled for an RRC hearing September 17, 2015.

The current rule and proposed change is:

"Approved provider. -- ~~One that has been granted the designation of "Approved Provider for Continuing Education" by the National Certification Board for Therapeutic Massage and Bodywork (NCBTMB).~~ One that has been approved by any entity with which the Board has reached a contractual agreement for the approval of continuing education providers and courses."

Our objection is based on the grounds that a substantive change is proposed to the current rule that now makes it more vague and introduces a process that is unspecified.

The rule lacks specificity in that it does not state any standards for what kind of entity or entities the Board would contract with.

The rule should state the procedure for designating that entity and where the contract and the name of that entity can be viewed by the public.

Furthermore, immediate adoption of this rule could result in disruption of services because the Board does not have a contract with any entity at this time. The *National Certification Board for Therapeutic Massage and Bodywork* (NCBTMB), who has provided the approval of Continuing Education Providers in North Carolina since massage licensure began, has offered to contract with the Board but the Board has not yet followed through. At this time all continuing education providers in North Carolina are approved by the NCBTMB, as required by the original rule .0702 (7). If this new permanent rule is adopted on September 17, 2015 without a contract with the current approving agency, NCBTMB, then there will be no approved continuing education providers to give massage and bodywork therapists their required CE hours in time for license renewal on October 31, 2015.

The entity or entities that this rule designates is crucial to the entire continuing education program for licensed massage and bodywork therapists. Changing that entity has a major effect on all teachers of continuing education, as well as licensed therapists. Therefore we trust that the process of designating that entity will be open, orderly, and allow input from the professional community that will be directly affected by any changes.

Thank you for your consideration of the Coalition's concerns.

Sincerely,

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