

June 24th, 2014

Dear Board Members,

My name is Anita Shannon, and I am a National Provider of CEs for the massage therapy field. I have been teaching for over a few decades, and feel strongly that we educators should have a voice in the upcoming changes and who is regulating us.

As I read through the website of the FSMTB, I find them to be very clear about their agenda. They strive to maintain a certain quality of basic education nationwide, to administer a test to qualify those who will practice, establish a basic guideline for all member boards for license renewal requirements, and regulate CE courses that are required for those renewals.

Since it appears that Professional Development courses will be optional for each state to require, the NCBTMB could maintain control of Professional Development course providers, while the FSMTB regulates and manages providers of the ethics and safety courses they recommend that states require for renewal.

Why not? It actually sounds like a workable idea, and then the FSMTB would not have to deal with the really large number of CE providers outside of the required ethics and safety courses recommended by the Federation. And we providers would not have to go through the terrific "growing pains" all over again as the FSMTB learns to manage such a large group.

When I read the FSMTB recommendations, they make it very clear that they want the states to decide whether they will require professional development CEs for renewal. Their precisely written mission statement is to standardize competency, ethics and safety to ensure public protection. This does not include professional development.

This concept of splitting the regulation of Competency Education providers and the Professional Development providers just seems a simple way to structure things permanently, or it could ease us all through a transition.

The FSMTB has absolutely no experience with providerships, and should not be regulating Professional Development courses and providerships if they leave the choice for PD CE requirements up to each state board. Professional Development courses are truly out of their jurisdiction and mission/agenda.

I cannot see state boards having problems with this structure ... they still will have regulation via the FSMTB for the required CEs in ethics, safety and competency, and the

Emblex test. Many states still accept the NCBTMB test as well as the Emblex, so why not accept CE providers from both? It will keep most of the practice act intact, and hopefully save time for the state boards, too.

I think that this would allow the whole field to move forward with a sigh of relief, with the changes coming a little easier with the CE regulation split rationally between two agencies ... acting as a good check and balance system, too.

It just makes sense to leave the Professional Development providers with the NCBTMB and shift the recommended required CEs to the FSMTB. This would in no way impact the license portability goals of the FSMTB, since the NCBTMB is an established national institution.

Humbly submitted for your consideration,

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