Staff:

Allow me to introduce myself. I am Kay Warren, I've been a practicing therapist for 30 years, across 5 states. I have experience in every setting from spas to doctor's offices. I've taught on and off since 92, primarily in continuing education. I would like to expand my teaching a bit, but direct practice is and always will be my first love. I would like to be able to teach in other states without difficulty.

As a result, I would like to comment on the proposed changes to continuing education requirement for NC. Specifically section .0700.

At this point, the NCBTMB is the only entity specifically approving providers of massage continuing education. As per rules about delegating authority to a 3rd party over which we have no control, this has the potential to be problematic. NY State currently has a contract with the NCBTMB that gives them control over what is approved for their state. This is one potential avenue to examine. The NCB has a long history of approving providers. While this history has not been without its problems, no new enterprise runs glitch-free, and their new management is doing an excellent job of being responsive and inclusive. I would not like to see them removed as an entity that approves providers of Continuing Education. I feel we can fix the third party issue without a great deal of trouble.

The NC Board has requested that the FSMTB undertake a process to begin approving CE providers and potentially courses as well. I personally support this, provided that NCBTMB also stays on as an approving entity. It would be fairly easy to use language that states "Any entity the board designates to approve CE Providers". There maybe another entity the state may wish to consider at some time in the future, this wording means we don't have to go back yet again, and do a yet another rule change to accept a new provider approval entity.

All this being said, I expect that the approved provider process the Federation is undertaking to develop will take 2-3 years. It is my hope that we not do a complete switchover to Federation approved providers since the make-up of that body changes regularly. New leadership could mean significant changes that we don't agree with. I am aware that the NC Board is a member, and not legally bound to adopt any of the Federation's suggested policies, but the regularity of change gives me pause. Who would they hire to do the direct approvals? A 3rd party company? Who would they be accountable to? Are they massage therapists or even people in the medical field? What training or experience do they have in the field of massage? What training or experience do they have in the field of massage?

As a practicing therapist who is looking to expand, I've been dismayed at the level of education our therapists have. As someone who has taken CE in this state for the last 8 years, I'm concerned about the level of our CE educators as well. The potential changes don't merely affect me as a part-time teacher, they affect me as a business owner as well. They affect all practicing therapists who want quality education. Which provider's classes are accepted? Which are not? If we do a complete switchover to only accepting a new entity's approvals, we set ourselves up for 1-2 years, (at a minimum) of chaos

over who we can take properly approved classes from. Multiply this by the 14,000+ therapists in this state.

I am all for the Federation developing a process to approve providers, I am all for the Board changing the Rules to allow for other approving entities to be accepted by the Board. I am not in favor of a complete switchover from one approval entity to another.

In addition, as an educator who will be affected by any alteration to the approved provider process and status, I would like to help you move forward in a way that benefits our profession and the public. We want to be included in your decision making process. But we can't give useful input if we don't know what proposals you are considering. Is it possible for some of our members to attend the meetings of the ad hoc committee you have created for CE or at least receive a report from the committee?

I've served on legislative committees before, and I'm willing to do the work again. This doesn't just affect CE Providers, it affects every therapist in the state.

Kay Warren