

Colorado Coalition of Massage Therapists  
Teleconference 02-20-2019  
Agenda for 03-13-2019 teleconference

In attendance:

Deborah Bruce, AMTA National Delegate  
Laura Embleton, ABMP Government Relations Director  
Mary Ann Foster, ABMP member  
David Gray, AMTA – Colorado Chapter GR  
Sarah McCormick, ABMP Government Relations Coordinator  
Tami Schumacher, AMTA – Colorado Chapter President  
Tsy Schupack, ABMP; CCMT Chair  
Chris Smith, Colorado School of Healing Arts  
Garin Vorthman, Colorado Legislative Services; state lobbyist  
Alfred Westlake, AMTA and ABMP member  
Kris Wills, Colorado School of Healing Arts

1) State legislation

- Garin reports all is quiet on the State legislation front

2) National legislation

- Laura - several states with deregulation bills; CE provider clarification in NM; practice act cleanup in OK

3) DPOS Stakeholder Meeting February 27, 2019 – CE issues

- Garin – no new details or potential language available
- Laura has spoken with Lorna Chandler stakeholder meeting will allow two-minute slot for comments, talking points may be obsolete by the time of stakeholder meeting with prior knowledge of language
- Tami recapped discussions with Lorna Chandler regarding approval process for providers and lowering entry costs
- Open discussion of possible talking points
- Alfred's detailed points included at end of document

4) MTLAD – Massage Therapy Legislative Awareness Day

- Garin has requested April 3, 2019 – 8:30 to 1:30 slot

5) Agenda for next teleconference 03-13-2019 at 8:00 a.m.

Phone number 1 (571) 317-3112, access code 643 934 973

- 1) State legislation update
- 2) National legislation update
- 3) MTLAD – Massage Therapy Legislative Awareness Day update
- 4) MTPA Sunset Review -- topics of future discussion

If you wish to propose an agenda item for the next meeting, please contact: [ccmtonline@gmail.com](mailto:ccmtonline@gmail.com)

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[Print](#) | [Close Window](#)**Subject:** Rules**From:** alfred@alfredsmassage.com**Date:** Wed, Feb 20, 2019 11:03 am**To:** 

Here are some ideas on possible rules for preapproved trade organization continuing education independent providers if complete exemption is off the table. It would be better if it could be exempted much like it is currently for the Associations, but if not then here are some ideas that take into account the current process DPOS actually uses.

A rule stating something like:

Independent individual continuing education instructors (Independent Providers) that are teaching courses that fit a description similar to Rule III, B., 4.

“when the course is approved and approval documented for continuing education courses through the relevant regulatory or governing agency, national professional association or trade organization, or through an accredited community college, college, or university. “

( or this could be more specific to massage or even more specific to NCBTMB, Whatever seems to work best to define the scope of the rule)

Are not required to submit the following forms and associated fees: Instructor Applications, Evaluators reports, Program or Stand alone course approval forms, Sales Agent permit form and fee, Student Assessment fee, or Location fees. The Independent Provider must conform to the catalog and description requirements of their approval organization. The Independent Provider may not hire or otherwise engage other instructors and may act only as a sole proprietor or single member LLC. All courses or programs offered under this rule must be preapproved by their professional organization and be continuing Education in nature. The Independent Provider may not engage a sales or enrolment agent and must handle all enrollments themselves. The Independent Provider will have no Records Retention or Student Graduate Data requirements beyond that which is required by their approval organization. They must submit an “Offsite Education Offering” form at least one month prior to any course offered within the State of Colorado and will not have to be subject to site inspection. Independent providers must maintain Organization approval throughout or be subject to immediate withdrawal as described in Rule III,B., 3.

“Programs or stand-alone courses regulated by another agency must have and maintain continuous approval by the body before the program/stand-alone course can be presented to the Board or staff for action. The withdrawal of approval of a program/stand-alone course by the other regulatory agency will result in an automatic withdrawal of approval of the program/stand-alone course by the Board.”

**Then in terms of actual Forms and process what could work is:**

Somewhere on the "Application to Operate a Colorado Private Occupational School"  
There could be a checkmark that says:

"I will be ONLY offering courses that fit the description in Rule III B 4."

OR

"I am an independent provider ONLY offering courses that fit the description in Rule III B 4."

OR

"I am ONLY offering Massage Therapy Continuing Education that has been approved by the NCBTMB"

Then under that there could be a line where one could name the organization, or even a checkmark for I am an "NCBTMB PROVIDER" ,

Then a place where the applicant can list their NCBTMB Provider number xxxxx.

**From that point there could be a slightly separate process that applies to those providers ONLY.**

This process would for the most part be the same, except that certain items that are required from a school could be left out because those items are already handled by the organization (NCBTMB).

NCBTMB already does all of these functions:

1) No Instructor Application

This is because the NCBTMB already has approved the instructor for the education being offered. Also because the only instructor is the sole provider.

2) Evaluators reports

This is because the NCBTMB has already provided an evaluator process and has deemed the education as being appropriate CE for it's audience.

3) Any Program or Stand alone course approval forms.

This is because all of the programs or standalone courses offered would be required to have already been approved continuing education by the organization (NCBTMB).

4) A shortened or no additional catalog requirements from those required by NCBTMB.

This is because the Professional Organization (NCBTMB) already has guidelines regarding course advertisement and listings, enrolment and cancellation policies.

5) No Separate Sales Agent permit form and fee.

This is because the Sole provider will always be their own sales and enrolment agent.

All of these functions have been provided for in one form or another by NCBTMB. So there is no need for redundancy.

So only those instructors that maintain approval status for themselves and their courses will be able to operate under the terms of this rule. Bond or surety would still be required, which would guarantee tuitions. Fees could be adjusted down because of the lessening of the required process.

Alfred