



September 22, 2023

TO: Lisa Tadeo, New Jersey Board of Massage and Bodywork Therapy Acting Executive Director

CC: New Jersey Board of Massage and Bodywork Therapy

RE: ABMP Opposes [N.J.A.C. 13:37A-4.2\(a\) Proposed Rule Amendment](#)

VIA EMAIL

Associated Bodywork & Massage Professionals (ABMP) provides professional liability insurance, business resources, professional publications, and legislative and regulatory advocacy for more than 80,000 members nationwide, including 3,000 members in New Jersey.

ABMP is writing both to address a missed opportunity and to strongly oppose the proposed rule amendment (N.J.A.C. 13:37A-4.2(a)) regarding continuing education (CE), which would remove our organization from the list of approved CE providers in New Jersey.

The missed opportunity is straightforward. COVID-19 appears to have fundamentally changed how massage therapy continuing education is delivered. CE providers who previously traveled to present in weekend workshops were forced by pandemic constraints to switch to virtual presentations. For numerous reasons, including being able to increase audience size, gain workshop advertising economies, and reduce travel fatigue, a substantial share of presenters permanently shifted to online presentations after COVID-19 receded. Some CE subject matter still requires hands-on demonstration and practice, but many subjects can be taught just as effectively online. New Jersey could embrace this new reality by increasing the proportion of the 20 biennially required CE hours permitted to occur online—at least by increasing from the current six-hour maximum to 10 or more hours.

As to the proposed rule amendment, under section 13:37A-4.2 of the current [New Jersey Board of Massage and Bodywork Therapy Regulations](#) (page 24) that addresses continuing education programs, the Administrative Code states:

- a) A licensee may obtain continuing education credit hours from the following:
  - 1) Successful completion of continuing education courses or programs related to the practice of massage and bodywork therapy, one credit hour for each hour of instruction. Courses and programs shall be approved by, or offered by providers approved by:
    - i. NCBTMB;
    - ii. NCCAOM;
    - iii. American Massage Therapy Association (AMTA);
    - iv. American Organization for Bodywork Therapies of Asia (AOBTA);
    - v. Association of Bodywork and Massage Professionals (ABMP);
    - vi. American Nurses Credentialing Center (ANCC);
    - vii. American Polarity Therapy Association (APTA);
    - viii. American Physical Therapy Association (APTA);
    - ix. FSMTB;

- x. International Association of Structural Integrators (IASI);
- xi. American Medical Association (AMA);
- xii. Ida P. Rolf Research Foundation; or
- xiii. A state board of massage, massage and bodywork, physical therapy, or chiropractic

As is the case for most of the organizations listed above as massage CE providers, ABMP itself does not approve CE courses or providers. However, every one of the CE courses ABMP provides is approved by the National Certification Board for Therapeutic Massage and Bodywork (NCBTMB), the first listed organization above. This practice is ABMP policy. We do not release new courses without NCBTMB approval. It would be a misstep for the New Jersey Board of Massage and Bodywork Therapy (Board) to remove ABMP from the list of approved CE providers as our courses meet accepted quality standards.

ABMP has made a more substantial commitment to massage therapy continuing education than any other organization. Our current 773 hours of CE offerings from 638 courses, all of which are approved by NCBTMB under ABMP's NCBTMB Approved Provider account (451086-09), are greater than the combined NCBTMB approved hours offered by NCCAOM, AMTA, AOBTA, ANCC, American Polarity Therapy Association, American Physical Therapy Association, FSMTB, IASI, AML, and the Ida P. Rolf Research Foundation.

Course quality is subjective and often comes down to whether a course is NCBTMB or FSMTB approved or not. That subjectivity acknowledged, we believe ABMP's courses benefit from top-notch authors and presenters. ABMP is proud to offer New Jersey members popular courses in a variety of topics including ethics, safety, self-care, pathology, and anatomy from the most respected instructors in the profession.

We are confident New Jersey ABMP members value our CE courses. On top of paying for their license renewal fees and applicable local business permits, continuing education can be costly for massage and bodywork professionals. ABMP members receive free CE as a membership benefit. This helps New Jersey massage and bodywork professionals save money on otherwise expensive CE courses, allowing them to invest those savings in other aspects of their respective professional practices.

The narrative of the proposed rule states: "Finally, the Board has become aware that the Association of Bodywork and Massage Professionals (ABMP) [sic] does not approve continuing education courses or continuing education providers. The Board proposes to amend N.J.A.C. 13:37A-4.2(a) to remove the ABMP from the list of entities authorized to approve courses or providers."

Doing so would be both misguided and discriminatory. Singling out ABMP for elimination from the Board's approved provider list is ultimately a disservice to your massage and bodywork professionals. We are firm in our belief that, since our courses are approved by NCBTMB, an approved adjudicator under New Jersey Administrative Code, ABMP should remain an approved provider of individually approved continuing education courses for the benefit, convenience, and best interest of New Jersey massage and bodywork professionals.

We believe New Jersey desires to give massage and bodywork professionals broad course choices in satisfying CE requirements while assuring that those courses meet objective quality standards. Here is the heart of the problem. **What is semantically astray is that, among the 13 entities now listed as approved providers, only NCBTMB and FSMTB are independent, objective course assessment and approval authorities.** They should be separated out as authorized course approval bodies. The remaining listed organizations, including ABMP, perform some combination of course developer, sponsor, and/or provider roles. They should be described with different nomenclature, *listed as approved course providers for those specific course offerings that have been approved by NCBTMB, FSMTB, or both.* How this might look in regulation is shown in an attachment on page 3.

Thank you for considering our opinions. ABMP hopes for a constructive, amicable resolution of this issue with the New Jersey Board of Massage Therapy. Please understand, however, the strength of our beliefs. If the result of the rules revision process discriminates against ABMP, the way the proposed draft would, you should anticipate legal recourse.

I would appreciate an opportunity to further discuss this matter to ensure clarity. Please contact me at lance@abmp.com or 719-588-7310 if you have questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "L Hostetter". The signature is fluid and cursive, with a large initial "L" and a long horizontal stroke extending to the right.

Lance Hostetter, Government Relations Director  
Associated Bodywork & Massage Professionals

## Attachment

a) A licensee may obtain continuing education credit hours from the following:

1) Successful completion of continuing education courses or programs related to the practice of massage and bodywork therapy, one credit hour for each hour of instruction. Courses and programs shall be approved by:

National Certification Board of Therapeutic Massage and Bodywork (NCBTMB) and/or Federation of State Massage Boards (FSMTB).

Specific courses so approved by either NCBTMB or FSMTB that are developed, sponsored, or provided by any of the following organizations shall be considered eligible for satisfaction of continuing education requirements:

- i. NCCAOM;
- ii. American Massage Therapy Association (AMTA);
- iii. American Organization for Bodywork Therapies of Asia (AOBTA);
- iv. Associated Bodywork & Massage Professionals (ABMP);
- v. American Nurses Credentialing Center (ANCC);
- vi. American Polarity Therapy Association (APTA);
- vii. American Physical Therapy Association (APTA);
- viii. International Association of Structural Integrators (IASI);
- ix. American Medical Association (AMA);
- x. Ida P. Rolf Research Foundation; or
- xi. A state board of massage, massage and bodywork, physical therapy, or chiropractic.