April 25, 2022

Michigan Department of Licensing and Regulatory Affairs Re: Draft Changes to the Massage Therapy General Rules – Public Comment Bureau of Professional Licensing– Boards and Committees Section P.O. Box 30670 Lansing, MI 48909-8170

To Whom It May Concern,

Pursuant to the publication of the draft general rules for massage therapy, posted for a public comment hearing on April 25th, please accept the following response and feedback. As a key stakeholder, the AMTA appreciates the opportunity to review and provide comment on the proposed rule changes as this process moves forward and is implemented. Additionally, we have appreciated the ability to be an active participant throughout the process and believe that more voices at the table continues to create a better product.

The AMTA supports the draft rule set including changes pertaining to the training standards for identifying victims of human trafficking, adding references to the requirements for licensure or renewal contained in other rule sets, and amending the rules pertaining to licensure by endorsement and re-licensure to require the applicant to disclose every health care credential the applicant has ever held and to provide that the applicant must have resolved any disciplinary action taken against the individual before being relicensed or licensed by endorsement.

The AMTA believes these changes, although small, will have a positive impact on the profession. This rule set brings our profession in to compliance with recent changes to the Public Health Code and ensures that those massage therapists who may have disciplinary actions in other jurisdictions have those actions reviewed prior to practicing in Michigan. These changes to the administrative rule continue to treat LMTs as licensed health professionals and hold them accountable to meet those standards.

Thank you again for the opportunity to provide public comment on these proposed rule changes. Any changes to the general rules for massage therapy have a direct impact on the more than 1800 AMTA members and over 8000 licensed massage therapists across the state of Michigan.

Please do not hesitate to contact us if you have any questions. We look forward to working with the Department of Licensing and Regulatory Affairs as this process moves forward.

Sincerely,

Carrie Buechler President, Michigan Chapter - AMTA

Wendy Woerner Government Relations Chair, Michigan Chapter - AMTA