



ASCMT Response to Transitional Council Consultation Questions

Background

Below are responses to the Consultation Questions posed to the Alberta Support Council for Massage Therapy (ASCMT) by the Transitional Council. The content is consistent with information that has previously been shared by the ASCMT in communication with the “Coalition”, Director of Health Professions Policy & Partnerships at Alberta Health, other provincial and national massage therapy organizations, and in the public domain on the ASCMT website and social media.

The ASCMT would also like to note that despite having provided the ASCMT with a copy of the Coalition’s *Formal Submission Toward the Regulation of Massage Therapy under the Health Professions Act (HPA)*, none of the Transitional Council’s consultation questions request comment about the *Formal Submission’s* content. Given that, we have provided comments with regards to the *Formal Submission* under question 5 below and we request opportunity to discuss these during the meeting time in Edmonton allotted on Monday, March 20th, 2017.

Questions

1. Does your organization support the regulation of Massage Therapists in the Province of Alberta? Why/Why not ?

The ASCMT is in support of massage therapists being regulated as health professionals in the Province of Alberta.

Our first corporate objective reads, “To ensure that massage therapy becomes provincially regulated from a position of non-partisanship, in a manner that protects the public interest of the citizens of Alberta.”

Further, the ASCMT agrees that this regulation should occur consistent with the existing national standards for massage therapy (MT) as described by the Federation of Massage Therapy Regulatory Authorities of Canada (FOMTRAC) in the most current version of the *Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice (PCs/PIs)*, thus allowing for ease of movement between regulated jurisdictions as outlined in the Agreement on Internal Trade.

2. What do you anticipate will be some of the benefits of regulation in improving relationships with other health professionals ? How can the Transitional Council for the College of Massage Therapy help facilitate building those relationships ?

Consultation with other health professions in Alberta may help inform how to undertake a smooth transition for the profession from not previously regulated to that of a regulated profession. Further, these groups may also help inform the development of appropriate structure and function of the new regulatory college for massage therapists in Alberta.

However, the ASCMT sees relationship building with other health professions as a secondary, and the primary focus of the Transitional Council to be that of ensuring

regulations are established for the profession that protect the best interests of the Alberta public.

3. How should standards for continuing education for Registered Massage Therapists be developed?

The ASCMT believes that development of all requirements related to practitioner competency for the massage therapy profession must be aligned with the most current iteration of the PCs/PIs as described by FOMTRAC. This includes regulatory college activities related to transitioning existing practitioners, evaluating competency at entry to practice, and approval of continuing education/professional development activities. Each of these is addressed separately below.

TRANSITIONING

This describes the transition of individuals practicing massage therapy in Alberta to becoming regulated health professionals under the Health Professions Act.

The ASCMT recognizes that massage therapy practice and the regulatory landscape in Alberta is diverse and complex. As such, we acknowledge the following:

- There is great variability in core training and professional development activities among individuals who identify as massage therapists in Alberta.
- In the absence of an absolute agency (Regulatory College) defining a practice statement for MT, there is no means of establishing who might be part of the profession. Thus, the nature of describing which individuals might meet the definition of “massage therapist” prior to the establishment of a Regulatory College to dictate this is circular. This current lack of ability to define appropriately who is a massage therapist in Alberta is problematic.

We recommend that the following transitional steps be taken to allow for the most robust protection of the public best interest of Albertans, yet remain respectful of those individuals wishing to carry on practice as a massage therapist in the province.

1. Provisional Registration

All individuals who currently and publicly identify as Massage Therapists, Registered Massage Therapists, or similar titles may apply for Provisional registration.

- Applicants must not have outstanding or previously resolved disciplinary matters with any provincial or national professional association.
- Applicants must satisfy other general registration requirements as set out by the College (e.g., criminal record check, payment of fees, submission of credentials, etc.).
- Provisional registrants will be required to provide the College with the following information upon application:
 - Personal information - full name, date of birth, address, proof of residency in Alberta and eligibility to work in Canada);,; and
 - Professional information - proof of massage therapy education, proof of completion of related education, length of time in practice, practice address(es), membership in good standing with a provincial or national professional association, proof of current professional and general

liability insurance, proof of registration in good standing with any other health regulatory authority in Canada; and

- Ancillary information - proof of valid First Aid and CPR Certification; current Criminal Record Check including a search of the Vulnerable Persons sector.

2. General Registration

Any provisional registrant may register for and complete these evaluation mechanisms.

To apply for general registration, provisional registrants must:

- Complete the Multiple Choice Question and Performance Based Assessment

Upon completion and tabulation of results, each registrant will be provided an assessment report that indicates area(s) that require development and when relevant, associated timeframe(s) within which the areas must be developed.

Registrants must fulfill the requirements of their guided continuing competence process as described in the assessment report.

Any student enrolled in and attending massage therapy education programs when the Health Professions Act regulations come into force will be permitted to apply to become a provisional registrant upon graduation.

ENTRY TO PRACTICE

It is acknowledged that institutions providing massage therapy education will have a period of transition. When amendments to the Alberta Health Professions Act regulations come into force, institutions must meet the following criteria:

- Be licensed by the applicable branch of Alberta Advanced Education; and
- Must apply for, obtain, and maintain accreditation from the *Canadian Massage Therapy Council for Accreditation* in order that future graduates qualify to register for the Multiple Choice Examination and Performance Based Assessment delivered by the Alberta College of Massage Therapists.

CONTINUING EDUCATION/PROFESSIONAL DEVELOPMENT ACTIVITIES

The ASCMT believes that requirements related to continued practice competency of massage therapists should be aligned with the current iteration of the PCs/PIs as described by FOMTRAC. Ancillary skills and knowledge related to carrying on massage therapy practice (ie: business acumen, marketing, etc.) fall outside of the PCs/PIs and may be considered for credits in addition to practice related credits.

Approval of professional development activities for registrants of the College should be considerate of not just content, but also the providers' credentials to deliver the intended learning outcomes.

When ever possible evaluations of professional development activities should be consistent with the current regulated jurisdictions across Canada. These activities are important to the development of a well rounded professional and could be considered for credits in addition to practice related continuing education.

4. What is necessary to overcome any obstacles to Alberta's Massage Therapists wanting to move forward with regulation in the province of Alberta?

Effective change management strategies, based in leadership best practices, will be necessary to facilitate a smooth transition of the massage therapists in Alberta to becoming regulated health professionals.

In 2016, the ASCMT sponsored research that explored what leadership strategies would be required to advance the regulation of MT in Alberta. There is an appetite for regulating MT in Alberta, evidenced by this investigation and the industry survey conducted by the Coalition in 2015. Despite that, shifting focus from the practitioners to prioritizing the public best interest will be challenging, not just for industry leaders but for the individual therapists as well.

One of the recommendations that stemmed from the 2016 ASCMT research was to develop an engagement strategy to connect with massage therapists currently practising in Alberta to begin a shift in culture from service industry providers to health professionals. This connection could help to transition the professional population into the realm of regulated practice.

Several circumstances have contributed to how Alberta massage therapists currently self-identify. Historically, massage therapists in Alberta have had an affinity for the member services association to which they belong, and MT associations in Alberta show great diversity. Given that a regulatory college of massage therapy has yet to be established in Alberta, one could surmise that not all massage therapists in Alberta would currently see themselves as health professionals.

Cameron and Quinn (2011) identified that the necessary first step in designing successful cultural change is to obtain an accurate depiction of the current culture. The ASCMT is truly non-partisan as it has no affiliation with any of the MT associations in Alberta, it could approach a full industry scan from a neutral position. Effective engagement will be necessary to obtain the most accurate picture of the existing massage therapists in Alberta.

The ASCMT can also begin connecting the massage therapists in Alberta with those across the country. This can occur quickly and inexpensively by increasing their social media presence to prompt interactive conversations in various forums. Obst and White (2007) described community simply as a set of people with some kind of shared element, which, in this case, would encompass members of the Canadian health profession of MT. This could initiate a sense of belonging within profession on the national scene and serve to grow the community of MT health professionals.

5. Please provide additional comments or recommendations that will assist in the regulation process going forward.

The comments and observations of the Board members of the ASCMT, regarding the *Formal Submission Toward the Regulation of Massage Therapy under the Health Professions Act* are listed below for your consideration.

General Comments:

- A list of references is not given, therefore making it impossible to cite references made in the *Formal Submission* that a general online search fails to locate.
- We noticed several semantic and grammatical errors in the *Formal Submission*. Although these discrepancies might be seen as minor, we are very aware that our collective actions as leaders within the profession are subject to scrutiny. As such, we believe that the manner in which we present ourselves must be executed with precision and thus attention to detail is vastly important.
 - “Patient” and “Client” are used inconsistently
 - Capitalisation of the profession/title is inconsistent
- Little indication is given regarding how the College will operate.

Introduction, p. 3, last sentence:

- Reference is made to “Alberta Human Resources.” This could not be found when searched online.
- Reference is made to the “Employment Occupational Profile for Massage Therapists” which could also not be found when searched online. We surmise that the reference may have intended to be the Alberta Learning Information Service (ALIS) website, however there is no definition for “massage therapists”, only “massage therapist” (<http://occinfo.alis.alberta.ca/occinfopreview/info/browse-occupations/occupation-profile.html?id=71003239>).

Services Normally Provided, p. 3, second paragraph:

- The definition, cited from the CMTA, is correct however it describes massage therapy primarily as complementary to the other health professions. The following quotation, drawn from the same CMTA page, needs to be included as it depicts massage therapy on par with the other health professions:

“Massage therapists are primary health care professionals who consult and collaborate with their patients and other health care professionals to provide patient-centered care. Massage therapists ensure that the patients receive the highest quality evidence-based care in the treatment, management and prevention of musculoskeletal dysfunction and disorders. Massage therapists contribute to the reduction of pain and the rehabilitation of musculoskeletal dysfunctions to ensure maximization of function and improved quality of life.”

Whether any restricted activities from schedule 7.1 to the Government Organization Act are performed by the profession, p. 5:

- The paragraph states that other health care practices such as acupuncture, are not reflected in the *Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice* and would not be regulated by a future College in Alberta. However, in 2013 the College of Massage Therapists of Ontario (CMTO) addressed the matter of acupuncture use within massage therapy practice in Ontario by producing a document titled “*Acupuncture Practice Competencies and Performance Indicators for Massage Therapy.*” Therefore, although these competencies are not examined by the CMTO, the College does use the competencies to evaluate educational programs and direct members’ practices.
- The Alberta Health Professions Act (HPA) allows for overlapping scopes of practice among regulated health professions. College regulations normally address which, if any, restricted acts (described in Section 7.1.2 of Government Organization Act), a member may perform. The practitioner’s practice permit, issued by their respective regulatory college, lists these indicating that the practitioner has appropriate training to provide those services. As there are increasing numbers of massage therapists practising acupuncture, it would be prudent to include this in the prospective college regulations under the HPA.

Standards of Competence, p. 6:

- This was all taken directly from the original iteration of the *Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice* document. The 2009 letter of recommendation for regulation of MT from then Alberta Minister of Health, Ron Liepert, makes specific note that subsequent versions of this document should guide the regulatory process going forward. The *Formal Submission* makes no mention of this and is cause for concern, as point nine on page six of the *Submission* asserts that PCs/Pis document “will be reviewed and updated over time”.

Entry-to-Practice, p.7:

- Refers to “Foundational Knowledge principles” as one of the two sources upon which proficiency will be based. The PCs/Pis makes no reference to “Foundational Knowledge principles” at entry-to-practice but instead describes “foundational knowledge” this way on page 7:

“Entry-level Massage Therapists have a strong foundational knowledge base common to all licensed health care professionals in Canada. Massage therapy applies principles of physical, health and social sciences as well as the humanities.

Application of foundational knowledge is evident in the Practice Competencies and Performance Indicators.

With the implementation of this document, the depth of information included in massage therapy education shifts from foundational content to clinical application. Foundational knowledge is directly related to practice.”

Provincial examination for new entrants, p. 8, last paragraph:

- The notion of competency is ambiguous.

Transitioning current practitioners, p. 8:

- The *Formal Submission* fails to describe the MTAA Substantial Equivalency process and the NHPCA Competency Equivalency Exam. Without adequate information, we have concerns regarding the validity of these processes to test the competencies described in the current PCs/PIs document.
- Insurance companies are not appropriate evaluators of a massage therapist's competency.
- There is no mention of practitioners who continue to provide massage therapy services privately with no membership affiliation and possibly no malpractice insurance. There is no mention of mandatory registration in the *Formal Submission*.

Proposed College, p. 14:

- The *Formal Submission* states that the impending College will be an entity *separate* from the Associations contributing to the creation of the College. Reference is made, however, to a pending application for a Transitional Council to act as the transitioning body to a regulatory College. The proposed function of this Transitional Council could be seen to directly overlap with the ASCMT incorporation documents.
- Stated in the Transitional Council's Bylaws, Section 1: Membership, only senior staff from the 3 associations are eligible to become members. Further, the same section, albeit with vague wording, also precludes anyone who might be a subject matter expert in the practice of massage therapy from being eligible for appointment as a public member. It would seem as though the Transitional Council's third organizational object that intends to ensure the future regulatory body is created in a *non-partisan* manner to represent *all* practitioners, is not actually supported by its incorporating Bylaws.
- The primary purpose of a regulatory authority to protect the public best interest. There is no mention in the Transitional Council's Application for incorporation of protecting the public best interest.

Education and Training, p. 16:

- The last paragraph, states that the transition plan encapsulates all existing practitioners within the province and that no change is expected to practitioner availability for the public. This is simply not factual.

References

- Cameron, K. S., & Quinn, R. E. (2011). *Diagnosing and changing organizational culture: Based on the competing values framework* (3rd ed.). San Francisco, CA: Jossey-Bass.
- Obst, P. L., & White, K. M. (2007). Choosing to belong: The influence of choice on social identification and psychological sense of community. *Journal of Community Psychology* 35(1), 77–90. <http://dx.doi.org/10.1002/jcop.20135>