

**FORMAL SUBMISSION TOWARD THE REGULATION  
OF MASSAGE THERAPY UNDER THE HEALTH PROFESSIONS ACT**

Submitted by:

The Transitional Council for the College of Massage Therapists of Alberta (TC-CMTA), and  
The Canadian Massage and Manual Osteopathic Therapists Association (CMMOTA), and  
The Certified Registered Massage Therapist Association (CRMTA), and  
The Massage Therapist Association of Alberta (MTAA), and  
The Natural Health Practitioners of Canada Association (NHPC).

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## TABLE OF CONTENTS

<b>INTRODUCTION</b> .....	3
<b>SECTION 1 – Services Normally Provided</b> .....	3
Services Normally Provided .....	3
Number of Practitioners in Canada and Alberta .....	4
Description of National and Provincial Societies and Associations .....	4
Whether any Restricted Activities from Section 1.3 of the Health Professions Act are to be Performed by Registrants of the College .....	5
Restricted Activities Outside of Scope of Practice .....	5
<b>SECTION 2 – Competence</b> .....	6
Standards of Competence .....	6
Entry-to-Practice .....	7
Provincial Examination for New Entrants .....	7
Grandparenting Current Practitioners .....	8
Path 1 - For Current Members of the Four Associations .....	8
Path 2 - For Non-Association Massage Therapists .....	9
List of Approved Educational Programs .....	10
Description of Existing Continuing Competence Programs .....	10
<b>SECTION 3 – Risk</b> .....	11
Risk to the Profession .....	11
Complaints .....	11
Health Insurance Recognition .....	11
Risk to Persons .....	12
Authority/Power Differential .....	12
Inappropriate Treatment .....	12
“Masquerading” Massage Therapists – Public Confusion About Who is a Qualified Practitioner .....	12
<b>SECTION 4 – Other Legislation</b> .....	13
<b>SECTION 5 – Mobility</b> .....	13
<b>SECTION 6 – Distinct/Identifiable Profession</b> .....	14
<b>SECTION 7 – Proposed Protected Titles</b> .....	15
<b>SECTION 8 – Proposed College</b> .....	15
<b>SECTION 9 – Cost Benefit Analysis</b> .....	15
Cost of the College .....	15
Cost Benefit to the Province and Massage Therapists .....	16
Education and Training .....	16
Enhancement of Quality of Service .....	16
Expected Effect on Prices, Access, and Service Efficiency .....	17
<b>SECTION 10 – Rationale for an Independent College vs. Amalgamation with an Existing College     within Alberta</b> .....	17
<b>APPENDIX LIST</b> .....	19

## **INTRODUCTION**

This amended application has been prepared by the Alberta Working Group for the Regulation of Massage Therapy in conjunction with the Transitional Council for the College of Massage Therapists of Alberta (TC-CMTA). The Alberta Working Group for the Regulation of Massage Therapy (ABWG) is a committee, chaired by the President of the TC-CMTA, together with equal representation from the Canadian Massage and Manual Osteopathic Therapists Association (CMMOTA), the Certified Registered Massage Therapist Association (CRMATA), the Massage Therapist Association of Alberta (MTAA), and the Natural Health Practitioners of Canada Association (NHPC). We propose to use a definition that is consistent with other regulated jurisdictions in Canada and the Alberta Human Resources and Employment Occupational Profile for Massage Therapists.

This application has been prepared within the scope of the Application Preparation Guide questions and considerations, and in accordance with Section 25 of the Health Professions Act.

This application seeks to regulate the practice of massage therapy under the Health Professions Act for the purpose of treating medical conditions (therapeutic massage), which does include utilizing relaxation massage techniques, without restricting the practice of massage within Alberta.

The Health Professions Advisory Board recommended in 2009 *“that massage therapy be regulated under the Health Professions Act. Specifically, the Board recommends regulating therapeutic massage but does not recommend regulating other classifications of massage such as relaxation or culturally specific massage techniques such as “Shiatsu” massage.”* Other classifications not regulated may include individuals such as spa practitioners who provide relaxation massage services, culturally specific massage (such as Shiatsu or Thai massage), or body workers. These individuals, who choose not to register with the Regulatory College of Massage Therapy in Alberta, may continue to provide massage services, as long as they are not using protected titles and are not offering massage therapy services for the purposes of treating medical conditions. The specific use of the term “massage therapy” brings this application in line with the term which is commonly used in the other five regulated jurisdictions in Canada.

Regulating massage therapy as a health profession is consistent with the other regulated jurisdictions in Canada. It ensures the industry standard of practice of professional and ethical conduct is maintained to support the safe, ethical provision of care.

### **SECTION 1 - SERVICES NORMALLY PROVIDED**

*Services normally provided by a person practicing the profession, including the complexity of the services, how they are carried out, and if any services are supervised by another profession. Include: number of practitioners in Canada and Alberta; description of national and provincial societies or associations; whether any restricted activities from Schedule 7.1 to the Government Organization Act are performed by the profession.*

#### **Services Normally Provided**

Massage therapy, in practice, is the assessment, treatment and prevention of soft tissue physical dysfunction, injury, and pain, using manual and electro therapeutic modalities, soft tissue manipulation and mobilization. Massage therapy is a clinically oriented healthcare profession that can assist in alleviating pain and discomfort associated with repetitive strains, persistent chronic pain conditions, muscular overuse, and many other musculoskeletal dysfunctions arising from biopsychosocial stressors utilizing both therapeutic and relaxation techniques to provide a therapeutic outcome.

We propose that the scope of practice include those techniques and modalities which are included in the

*Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice September 2016 (IJPCPI)* and referenced directly in Appendix 5, and additionally those techniques and modalities requiring additional training which are highlighted in Appendix 7.

Massage therapy is an integral part of healthcare pertaining to the treatment of both acute and chronic conditions and overall health and wellbeing through preventative therapy. Key benefits of massage therapy include:

- Improving joint mobility
- Improving circulation
- Improving lymph drainage
- Reducing muscle tension
- Reducing stress, anxiety, and fatigue
- Reducing or eliminating pain
- Injury prevention and rehabilitation

The national Canadian Massage Therapist Association defines Massage Therapy as:

"The practice of massage therapy is the assessment of the Musculoskeletal system of the body and the treatment and prevention of physical dysfunction, injury and pain by manipulation, mobilization and other manual methods to develop, maintain, rehabilitate or augment physical function, relieve pain or promote health. Massage therapy is a clinically-oriented healthcare option that helps alleviate the Musculoskeletal disorders associated with everyday stress, physical manifestation of mental distress, muscular overuse and many persistent pain syndromes."<sup>1</sup>

This definition of Massage Therapy is consistent with those described by other regulatory Colleges. These definitions can be found in Appendix 2.

## **Number of Practitioners in Canada and Alberta**

The four Alberta Associations represented in this amended application as of March 2022 had a combined membership of 8888 practicing massage therapist members in Alberta. There are approximately 9000 Massage Therapists in Alberta who are members in one of the five professional Associations in Alberta and would qualify under the provisions laid out in this application for transition into the College of Massage Therapists of Alberta (CMTA). Across Canada, there were approximately 30,000 practicing Massage Therapists in 2016.

## **Description of National and Provincial Societies and Associations**

There are five regulatory Colleges in Canada.

In Ontario, the massage therapy profession became regulated under the Drugless Practitioners Act in 1919. In 1991, the government established the College of Massage Therapists of Ontario under the Regulated Health Professions Act.

In British Columbia, the massage therapy profession became regulated under the Physiotherapy Act in 1946. In 1995, the government established the College of Massage Therapists of British Columbia under the Regulated Health Professions Act. On June 28, 2024, the College of Massage Therapists of British Columbia amalgamated with three other regulatory colleges to form the College of Complementary Health Professionals of BC.

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<sup>1</sup> <https://crmta.ca/wp-content/uploads/2021/06/National-Standards-of-Practice-APPROVED1.pdf>

In Newfoundland and Labrador, the massage therapy profession became regulated under the Massage Therapy Act in 2002.

In New Brunswick, the massage therapy profession became regulated under the Massage Therapy Act in 2013.

In Prince Edward Island, the massage therapy profession became regulated under the Regulated Health Professions Act in May 2019.

The Federation of Massage Therapy Regulatory Authorities of Canada (FOMTRAC) is the national organization for massage therapy regulators in Canada. They represent the provincial agencies that regulate massage therapy under legislative authority. Their goal is to promote consistency and excellence in regulating massage therapy across Canada. All massage therapy regulatory bodies that operate under provincial legislation in Canada are eligible to belong and contribute to the activities of FOMTRAC. Established in 2003, the organization is governed by a Board of Directors composed of registrars and/or FOMTRAC representatives from each of the provincial regulators. In 2015, FOMTRAC was formally incorporated under the Canada Not-for-profit Corporations Act (NFP Act).

Currently, the governments of Manitoba and Nova Scotia are contemplating regulation in their respective jurisdictions.

In Saskatchewan, *The Massage Therapy Act* was passed on May 11, 2021, to regulate the profession of massage therapy. The Act received Royal Assent on May 13, 2021, and is currently awaiting proclamation.

In Alberta there are five Associations:

- Alberta Regional Massage Therapy Association (ARMTA)
- Canadian Massage and Manual Osteopathic Therapists Association (CMMOTA)
- Certified Registered Massage Therapist Association (CRMTA)
- Massage Therapist Association of Alberta (MTAA)
- Natural Health Practitioners of Canada Association (NHPC)

While the Alberta Regional Massage Therapy Association (ARMTA) has not been a part of drafting this amended application, they have provided letters of support for the regulation of massage therapy in Alberta, which are included in Appendix 10 of this application. Ongoing engagement with ARMTA and any other new Association(s) will continue once the application has been submitted.

### **Whether any Restricted Activities from Section 1.3 of the Health Professions Act are to be Performed by Registrants of the College**

We are seeking to have the restricted activity of Dry Needling included as part of the massage therapy profession if advanced training requirements are met by the registrant for practice of the restricted activity. The details surrounding this modality are included in Appendix 7 titled *Modalities Requiring Additional Education*.

### **Restricted Activities Outside of Scope of Practice**

Modalities that are considered restricted activities outside of the scope of practice for massage therapists are those that require separate training, title and legal authorization different from that of a registered massage therapist to be performed. Practitioners with a proper applicable education and membership to a

separate regulatory body are able to practice the restricted modalities, but not able to perform them while acting under the title of a registered massage therapist. Practice skills and techniques performed during a massage therapy session must be limited to those encompassed within the scope of practice of a massage therapist.

These modalities may include, but are not limited to:

- High Velocity Thrust Manipulations
- Colon Hydrotherapy
- Psychotherapy
- Traditional Chinese Medicine (Acupuncture, Tuina)

## **SECTION 2 - COMPETENCE**

*Qualifications and minimum standards of competence that are required for a person applying to practice the profession and how the continuing competence of practitioners is to be maintained. Include: list of educational programs for entry to practice; description of any existing continuing competence programs.*

### **Standards of Competence**

Massage Therapists must demonstrate the professional ability to assess a patient's treatment needs using their education, experience, and ongoing competency development attained through the quality assurance/continuing education program(s) of the College. Registrants must also recognize when a referral to other health professionals is required to best treat the patient.

We propose to adopt Entry-to-Practice competencies based on the *Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice September 2016 (IJPCPI)* developed and approved by the College of Massage Therapists of British Columbia, the College of Massage Therapists of Newfoundland & Labrador, the College of Massage Therapists of Ontario, and the College of Massage Therapists of New Brunswick. Following these approved guidelines will allow the CMTA to meet the determined national standards to allow inter-jurisdictional mobility through the Canadian Free Trade Agreement. Registrants will be required to complete Jurisprudence training and examination, as is common practice in other regulated jurisdictions.

The *IJPCPI* defines a Practice Competency as follows:

"Practice Competency is the ability to perform a practice task with a specified level of proficiency."

The *IJPCPI* indicates that at entry-to-practice, Entry Level Proficiency is required. As per the *IJPCPI*, this level of proficiency has the following characteristics:

- When presented with routine situations, the entry-level massage therapist applies relevant competencies in a manner consistent with generally accepted standards in the profession, without supervision or direction, and within a reasonable timeframe. The massage therapist selects and applies competencies in an informed manner. The massage therapist anticipates what outcomes to expect in a given situation and responds appropriately.
- The entry-level massage therapist recognizes unusual, difficult to resolve and complex situations which may be beyond their individual ability. The massage therapist takes appropriate and ethical steps to address these situations, which may include seeking consultation, supervision or mentorship, reviewing research literature, or making a referral.

The Practice Competencies in the *IJPCPI* will be the minimum expectations for newly registered massage therapists who are entering practice in Alberta for the first time and are intended to ensure the ability to perform entry-level practice in a manner that is safe, effective, and ethical. Practice competencies should be

viewed as an integrated set of abilities that the massage therapist brings to the workplace, and draws upon as necessary, dependent upon the practice context. Each competency qualifies and informs the others. The competency profile, once completed by the College, will be specific to practice in Alberta.

Following entry-to-practice, a massage therapist's competencies will continue to evolve based upon increasing experience, ongoing learning from colleagues, and professional development activities. Levels of proficiency in frequently used competencies may be expected to increase; new competencies may be learned; levels of proficiency in competencies that are not regularly used may decrease. In general, over the span of a career, the massage therapist will move beyond entry-level practice.

The Practice Competencies have been grouped under the following functional areas of practice:

1. Professional Practice
  - 1.1. Communication
  - 1.2. Professionalism
  - 1.3. Therapeutic Relationship
2. Assessment
3. Treatment
  - 3.1. Treatment Principles
  - 3.2. Massage Techniques
  - 3.3. Therapeutic Exercise
  - 3.4. Thermal Applications

Massage therapy relies heavily on the application of principles of the physical, biological, health, social and behavioural sciences. Massage therapists require a strong foundational knowledge base common to all licensed and regulated healthcare professionals in Canada, and a more specialized foundational knowledge base related to the structure, function and inter-relationships of the body systems and their response to treatment.

### **Entry-to-Practice**

Once the CMTA is operational and current Massage Therapists have transitioned into the College, we propose entry-to-practice proficiency assessment be conducted through two means identified in the *IJPCPI* document:

- Graduation from an approved education program; and
- Successful completion of a registration exam

Competencies for entry-to-practice, must ensure the safety of the public and establish standards for Alberta Massage Therapists which reflect high-level understanding by the Massage Therapists. This will include, but is not limited to, First Aid and CPR certification to be defined in policy, and criminal record checks. We propose that the criminal record check includes a vulnerable sector check as Massage Therapists may practice on special populations.

### **Provincial Examination for New Entrants**

We propose that an entry-to-practice provincial examination for new CMTA registrant applicants be competency-based, rather than an "hours of instruction model", which follows the *IJPCPI* requirements. We believe that a competency-based examination prior to registration in the CMTA is the best indicator of knowledge, judgment, and skills of the Massage Therapist, rather than assumed through hours of instruction. This exam model sets practice standards that all candidates must demonstrate before they can enter practice.

The proposed competency-based model, which assesses learner outcome-based competencies, is already in

use by the other Colleges in regulated provincial jurisdictions in Canada. The regulatory College will develop the proposed examination as there is no national examination currently available. We recommend that the proposed examination be developed in collaboration with existing educational programs, other regulators, and psychometricians. It would include both practical and written components, with a maximum of three examination attempts to be successful. We propose that the College consider offering the examination twice per year.

## **Grandparenting Current Practitioners**

### Path 1 - For Current Members of the Four Associations

The working group recommends that practitioners registered in good standing in the following membership categories be transitioned into the CMTA when regulation is proclaimed in force:

- Those registered with the Canadian Massage and Manual Osteopathic Therapists Association (CMMOTA) in the membership category of Full Massage Therapist member; or
- Those registered with the Certified Registered Massage Therapist Association (CRMTA) in the membership category of Active Status member; or
- Those registered with the Massage Therapist Association of Alberta (MTAA) the membership category of Active Status member; or
- Those registered with the Natural Health Practitioners of Canada Association (NHPC) in the membership category of Regular Massage Therapist member.

This is in recognition that these individuals registered in these membership categories meet or are substantially equivalent to the proposed entry to practice requirements of the profession. The requirements of the Associations for entrance into these membership categories are included in Appendix 8 under Association membership entrance and continuance requirements.

In addition, these practitioners must also:

- Provide proof of English fluency as per proposed College policy; and
- Provide a Criminal Record Check dated within 30 days prior to submission which can be accepted as per proposed College policy; and
  - Rationale – Massage Therapists treat vulnerable populations as described in S6.3 (1) of the Criminal Records Act. This requirement is also in line with other provincial regulatory Colleges as well as the four Alberta Massage Associations. Massage Therapists when providing treatment are in a position of trust and the patients in their care are in a vulnerable position. Accordingly, the working group believes that a Criminal Record Check is the appropriate level of criminal record screening for registration with the College. Further it would support the principles of transparency and accountability of the College.
- Provide valid certification of standard first aid and level C CPR as per proposed College policy; and
  - Rationale – The reason for this as a requirement is to provide the date of certificate expiration to the College. We would propose that the College make maintaining a valid certificate in Intermediate First Aid and Level C CPR a requirement of the continuing competency program. This is currently the practice of all four Massage Therapy Associations in Alberta.
- Provide evidence of being a Canadian citizen or lawfully permitted to work in Canada as prescribed in proposed College policy; and
- Provide a copy of valid government issued photo identification as per proposed College policy; and
- Provide proof of professional liability insurance with a minimum of \$2,000,000 liability coverage per claim or occurrence with a minimum of \$5,000,000 aggregate coverage.



Eligible massage therapist members residing in Alberta who have completed their education program and are members in good standing of one of the four Associations may join the College by registering with the transitional society during the transitional period which follows introduction of legislation to add amendments to the HPA to add a Schedule for the profession but is prior to proclamation of the Schedule, or by registering with the College as a grandparented registrant within 90 days after the date of proclamation of the Schedule.

For associations formed after the date of this original application, (approved in principle by the Alberta Government in June 2016), therapists belonging to these associations will be eligible to enter into the College using the below recommended secondary pathway. This includes the ARMTA.

#### Path 2 - For New Association(s) and Non-Association Massage Therapists

Any individual who resides in Alberta and is a practicing massage therapist who is not a member of one of the above Associations may join the College or Transitional Society by providing the following:

- Proof of completion (diploma and transcripts) of a minimum of a 2200-hour massage therapy program licensed by Advanced Education in Alberta on the date of program completion; or
- Proof of completion (diploma and transcripts) of a minimum of a 2200-hour or two-year program in those jurisdictions which do not dictate the 2200-hour requirement that are licensed by the applicable government body in the Canadian jurisdiction the program is located in; or
- If education was completed outside of Canada complete a Prior Learning Assessment and Recognition (PLAR) as described per proposed College policy; or
- If the education level is lower than either of the two standards listed below, then the applicant must demonstrate substantial equivalency through the combination of their work and education history (including initial certification and any additional certifications/continuing education courses taken):
  - a minimum of a 2200-hour massage therapy program licensed by Advanced Education in Alberta; or
  - a two-year program in those jurisdictions which do not dictate the 2200-hour requirement that are licensed by the applicable government body in the Canadian jurisdiction the program is located in.

This will be established by the completion of a PLAR as described in proposed College policy; and

- Provide proof of 500 hours of practice in the previous 3 years as per proposed College policy; and
  - Rationale – this provides proof that the individual is active in practice. This standard is used in other regulated provinces to maintain active membership status in the College.
- Provide proof of English fluency as per proposed College policy; and
- Provide a Criminal Record Check dated within 30 days prior to submission which can be accepted as per proposed College policy; and
  - Rationale – Massage Therapists treat vulnerable populations as described in S6.3 (1) of the Criminal Records Act. This requirement is also in line with other provincial regulatory Colleges as well as the four Alberta Massage Associations. Massage Therapists when providing treatment are in a position of trust and the patients in their care are in a vulnerable position. Accordingly, the working group believes that a Criminal Record Check is the appropriate level of criminal record screening for registration with the College. Further it would support the principles of transparency and accountability of the College.
- Provide valid certification of standard first aid and level C CPR as per proposed College policy; and
  - Rationale – The reason for this as a requirement is to provide the date of certificate expiration to the College. We would propose that the College make maintaining a valid certificate in Intermediate First Aid and Level C CPR a requirement of the continuing competency program. This is currently the practice of all four Massage Therapy Associations in Alberta.

- Provide evidence of being a Canadian citizen or lawfully permitted to work in Canada as prescribed in proposed College policy; and
- Provide a copy of valid government issued photo identification as per proposed College policy; and
- Provide proof of professional liability insurance with a minimum of \$2,000,000 liability coverage per claim or occurrence with a minimum of \$5,000,000 aggregate coverage.

Applicants choosing this pathway who reside in Alberta may apply to join the College by registering with the transitional society during the transitional period which follows introduction of legislation to add amendments to the HPA to add a Schedule for the profession but is prior to proclamation of the Schedule, or by registering with the College as a grandparented registrant within 90 days after the date of proclamation of the Schedule.

### **List of Approved of Educational Programs**

We propose to use the *IJPCPI* as the educational standard. This document is included as Appendix 4 to this application.

The *IJPCPI* shall be integrated into the educational requirements, resulting in well informed and well-trained Massage Therapists. Business management, accounting and clinical operation skills may be included in a school's curriculum, but not tested at the provincial level.

In addition to the *IJPCPI* education program specifications, a project began in 2013 through the Federation of Massage Therapy Regulatory Authorities of Canada (FOMTRAC) that has established a national education accreditation program through the Canadian Massage Therapy Council for Accreditation (CMTCA). We propose that education programs may be assessed through an accreditation program to be determined by the CMTA, once established. The College must evaluate the CMTCA against the standards set out for Alberta provincial regulatory bodies as outlined in the Health Professions Act. If this program meets the standard required by the HPA and the College, it may be adopted as the accreditation program. Alternatively, the CMTA may create its own program approval committee to assess and accredit its own educational program approval process and continuing education competency program to ensure adaptability and responsiveness as standards change provincially for public protection. Regardless of the decision on program accreditation, the CMTA will still require a program approval committee.

Some regulated health profession bodies are moving towards accreditation provincially with a national exam to ensure consistency between regulated provinces and territories to ensure labour mobility agreements are met. However, currently there is no national board or national board exam available in Canada for the massage profession. The provincial exam, that will be based on *IJPCPI*, will also meet the national competency requirements set out by FOMTRAC.

There are numerous schools of massage therapy in Alberta. However, currently there is no educational standard related to the *IJPCPI* that is required in Alberta, and we recognize that not all programs may produce graduates with the practice competencies proposed for the new College.

As of September 2023, there are 31 private learning institutions that provide 69 massage therapy programs approved by the Private Career Colleges Branch of Alberta Advanced Education. In addition, there are 3 public learning institutions in Alberta with massage therapy education programs. A full list of all massage therapy programs can be found on the ALIS website at <https://alis.alberta.ca/>. The contact person for any massage program inquiries can be reached by contacting the Director of Private Career College Branch.

Upon legislation, during the transition period, we propose the CMTA work with identified educational

institutions, particularly as the approved accreditation program unfolds, to support programs in understanding and complying with the requirements. This will ensure massage therapy programs will have the opportunity to meet Entry-to-Practice education standards once the legislation is proclaimed.

### **Description of Existing Continuing Competence Programs**

The goal of any continuing competency program is to allow practitioners to continually maintain and improve their knowledge and skill set within the scope of practice when treating their patients.

We recommend that the future college's continuing competence program may include the following: practice visits; credit-based or outcome-based continuing education; self-reflections or personal learning development plans.

We currently support continuing competency programs for our individual Associations and their members, which are included in Appendix 8. These are consistent with the programs used by regulatory Colleges in regulated jurisdictions in Canada.

With regulation, Registrants would be subject to the obligations in the HPA that ensure professionals maintain their competency and view their skills development as a life-long process. The HPA obligates all health professionals to view the maintenance of competence and the ability to apply advances in their profession as a life-long process.

### **SECTION 3 - RISK**

*Risk to the physical and psychological health and safety of the public from incompetent, unethical or impaired practice of the profession.*

Risk mitigation is a high priority for the practice of massage therapy. The profession's common risk areas revolve around two main concerns: risk to the profession and risk to persons.

#### **Risk to the Profession**

##### Complaints

All Massage Therapists in good standing with one of the five provincial Associations previously mentioned are currently subject to complaint investigation and discipline through their own Association. Over the last four years (2020-2023) the four associations received 68 vexatious complaints, and 116 investigated complaints which may have resulted in disciplinary action. The investigated complaints fell into the following categories: sexual abuse, professional misconduct and behaviour, competency in providing client care, record keeping, intent to mislead including fraud, communication, registrant incapacity, billing and fees, or harassment/boundary violations.

While regulation through a College will not eliminate all risks and will not immediately remove incompetent or unethical practitioners from the profession, a benefit of regulation is consistency of protocols, reporting mechanisms, investigation, and discipline. Regulation would provide a mechanism for the public to lodge a complaint with the regulated College about any practice that falls below the standard expected in the profession and trigger an investigation. This puts into place mechanisms for the public to lodge an official complaint if they have been subjected to inappropriate procedures and misconduct of registrants. This streamlining is also important for protecting and providing the public with one-point-of-contact for filing complaints that may arise, rather than the current system where clients must determine which Association, if any, the practitioner is associated with in order to file a complaint with the appropriate organization.

##### Health Insurance Recognition

Currently, clients of massage therapy assume that if they have extended health benefits insurance coverage that they can be compensated for treatments. However, insurance providers in an unregulated environment are not consistent in reimbursing insurance receipts. Some Massage Therapists are recognized by some providers but not others, while some are recognized by all insurance providers. This inconsistency creates confusion for clients and Massage Therapists alike.

In a regulated environment this confusion would be resolved. Regulating these professions will serve to encourage coverage through private plans, although coverage will remain the decision of the employer and insurer. Regulation will broaden the choice of provider, (regulated massage therapists) that are available to the public, providing more opportunities for Albertans to find massage therapists that are best suited to their needs.

It should also be noted that at this time Alberta Health does not provide these services as part of the public health care system.

## **Risk to Persons**

### Authority/Power Differential

Given the nature of therapist/patient interaction where the patient is normally disrobed or partially disrobed, in a closed-room environment for an extended period, the therapist has considerable authority. Misconduct in this environment, by either the patient or practitioner, can pose a high-level risk. In recent years, Alberta's Associations complaint officers have seen an increase in the number of reported cases of sexual misconduct, often due to predators recognizing the opportunity that exists in this profession. The ability for a patient to take steps, through a College reporting mechanism, which is supported by investigative and disciplinary policies and procedures will ensure the risk is managed to best protect the public.

### Inappropriate Treatment

Massage therapy practitioners can potentially pose a risk to patients by virtue of the therapists' inappropriate assessment and/or treatment of medical/pathological conditions. While massage therapy historically was limited to massage for relaxation and stress reduction, the scope of practice has since expanded to include broader therapeutic treatment options. If practitioners do not recognize contraindications and do not correctly modify treatment, the unintended consequences may result in life-altering injuries. With competency-based Entry-to-Practice standards, a practitioner's abilities to identify contraindications, as well as the pathological, psychological, and physiological limitations to treatment would be assessed. Practitioners must provide treatments to patients within the scope of practice set forth by the regulation. Further, they must refer patients to other regulated health professionals when necessary for appropriate treatment.

## **"Masquerading" Massage Therapists - Public Confusion About Who is a Qualified Practitioner**

The word massage has three connotations within Canadian society:

- the health profession that provides para-medical massage services; and
- those who provide massage services but are not a registrant of a College or recognized association in unregulated jurisdictions; and
- sex trade workers.

Currently, it is possible for unqualified, incompetent, and unethical people who do not meet the massage industry standard to claim to be "Massage Therapists" and practice in Alberta. These circumstances present serious, yet largely avoidable risks to the public. Having a regulatory College in place will:

- establish and enforce minimum standards for professional and ethical conduct to support the safe, ethical provision of care; and
- allow the public to verify practitioner credentials to ensure they are working with trained professionals; and
- allow for the reporting of "masquerading" practitioners for illegally using a protected title.

The Massage Associations in Alberta have been removing Massage Therapists from their memberships as a result of misconduct. However, these individuals most often continue to practice "massage therapy" on the unsuspecting public.

Illicit Massage Businesses have been growing. Illicit Massage Businesses provide sexual labour, at times under the duress of human trafficking or nefarious business owners, in a store front in addition to residential Illicit Massage Businesses. These businesses are sometimes used as fronts for labour and sex trafficking and money laundering (see Appendix 3). Many of these businesses hold legitimate health professional massage credentials and business licenses as a front, but in the privacy of the treatment rooms the practitioner(s) are willingly or unwillingly delivering on sex acts.

Furthermore, illicit massage business issues are compounded by privacy law restrictions preventing Massage Associations and health insurance companies from learning the names of these members from law enforcement. Registered practitioners providing illicit services and breaching professional boundaries are not being held accountable to professional standards so that their Association membership may be revoked. This creates an opportunity for illicit massage businesses and practitioners to defraud health insurance companies by billing for illicit services under the guise of legitimate massage treatments. Regulating the massage profession provides an opportunity to make provision for law enforcement to communicate with the regulatory College and the insurance industry.

It is suspected that some massage educational credentials from recognized and accredited massage vocational programs may be forged in order to gain recognition with Associations, both by illicit businesses involved in human trafficking, and nefarious individuals. This is another reason to regulate the massage profession, as it would provide oversight to educational standards coupled with the requirements for new registrants of the profession to complete entry to practice competency testing. Within a College regulated environment, the ability to promote and enforce a competency standard for all therapists is very valuable, and if necessary, provides a framework for investigating and disciplining registrants who contravene the standards, while discouraging and/or preventing under qualified and/or sex trade workers from masquerading as massage professionals.

#### **SECTION 4 - OTHER LEGISLATION**

*Whether the services normally provided by persons practicing the profession are regulated by any other legislation in Alberta.*

At present, the services provided by Massage Therapists practicing in Alberta are not regulated under any other legislation.

#### **SECTION 5 – MOBILITY**

*Regulation of the profession in other provinces/territories and the effect, if any, that regulation may have on practitioner mobility throughout Canada.*

We understand that should the Alberta Government choose to move forward with regulating the massage therapy industry that it would be required to notify the other signatories of the Canada Free Trade

Agreement (CFTA) and the New West Partnership Trade Agreement (NWPTA)<sup>2</sup> because of regulating this new profession.

If massage therapy is regulated in Alberta, the College would create a pathway for labour mobility by creating jurisprudence training and examination for any registrant of a regulated massage college from another Canadian jurisdiction to enter the college. The jurisprudence examination would also be part of the entry-to-practice requirements for registration as a massage therapist in Alberta. It will be designed to assess an applicant's knowledge and understanding of the rules and provincial scope of practice that impact massage therapy in Alberta.

We have included a comprehensive comparison document as Appendix 15. This document compares the current accepted massage techniques and modalities that are considered in various regulated provinces and what we are proposing as those techniques and modalities which would fall within scope of practice. Additional information on the modalities which we are proposing can also be found in Appendix 5, 6, and 7.

We recognize that there currently exists a difference between regulatory bodies across the country in what is and is not considered within scope of practice. This reasoning is why we propose to have a mandatory jurisprudence training and examination required to be completed prior to practice for any registrant transfer between regulated jurisdictions. This is current common practice with other regulated massage therapy colleges in Canada.

## **SECTION 6 - DISTINCT/IDENTIFIABLE PROFESSION**

*Whether, and how, the profession is distinct and identifiable from other professions.*

The massage therapy profession includes a range of techniques and therapeutic modalities, in a manner similar to other regulated professions. Massage Therapists assess patients within the range of their competence and apply appropriate treatments. The treatment may include soft tissue manipulation, soft tissue and joint mobilization, electrotherapeutic modalities, and many other forms of therapy that are utilized to maintain, rehabilitate, and improve physical function, relieve pain, and/or promote health. Treatments may also include manual stretching, hydrotherapy, and suggestions for therapeutic self-care. A list of modalities which are included or excluded within the practice of massage therapy can be found in the following appendices:

- Appendix 5 – Modalities in Inter-Jurisdictional Practice Competencies and Performance Indicators
- Appendix 6 - Modalities Outside of Scope
- Appendix 7 - Modalities Requiring Additional Education

One of the distinguishing characteristics of massage therapy is the significant difference in the time spent, with patients, to provide therapeutic care when contrasted with comparable para-medical services and other health professions. An average treatment session is approximately 60 minutes of one-on-one care. By having longer treatment sessions, massage therapy takes an approach to physical dysfunction and incorporates evidence informed treatment for multiple issues in the same session.

Standard massage therapy has been integrated into the health care environment by providing members of the public and healthcare professionals with a range of choices of therapy that are safe, effective, accessible, drug-free, and non-invasive. Similar to other health professions, the profession of massage therapy focuses upon the best interests of a patient's health through assessment and treatment plans to address pain relief, restoration of function, as well as prevention of injury and maintenance of overall health.

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<sup>2</sup><https://www.alberta.ca/labour-mobility-canada>

## **SECTION 7 - PROPOSED PROTECTED TITLE**

*The proposed protected title, and why appropriately descriptive and unlikely to cause confusion to the public.*

The proposed protected titles are:

1. Registered Massage Therapist (RMT);
2. Massage Therapist (MT);
3. Provisional Massage Therapist (PMT);
4. Licensed Massage Therapist (LMT);
5. Certified Massage Therapist (CMT);
6. Massage Practitioner (MP);
7. Registered Massage Practitioner (RMP);

We believe that the proposed titles accurately describe the profession, will assist the public and patients to distinguish between regulated and unregulated providers of massage therapy, and is consistent with protected titles used elsewhere in Canada.

Section 33 of the HPA states that the College council "must establish, in accordance with the regulations, a regulated members' register for one or more categories of members who provide professional services of the regulated profession." Consistent with the HPA and other regulated jurisdictions, the proposed CMTA will make the names of all College registrants known to the public through published lists, by telephone contact with the College office, and through a College website. As well, the protected titles found in the regulation will be used to register practitioners as "regulated", "registered" or "licensed" and only those who are registrants of the CMTA may bear that title in Alberta.

## **SECTION 8 - PROPOSED COLLEGE**

*Details of the proposed college of the profession and how it will carry out its powers and duties under the HPA. If an existing society or association is proposed to become the college, include: number of members and age of the organization; existing bylaws, standards and codes; a description of the board and committees.*

The CMTA would be a separate entity to any existing individual Massage Therapy member Association or the TC-CMTA. The four Associations intend to create a new society to act as the transitioning body for the CMTA once legislation has been passed to establish the College. This new society will include a council comprised of equal representation from each of the four Associations represented as the submitters of this application.

We propose that the CMTA be developed in accordance with the national standards set out in the *IJPCPI* and with information from other Colleges in regulated jurisdictions in Canada. The competency profile for the entry-to-practice exam will be developed based on the *IJPCPI* at Entry-to-Practice currently used by other Colleges of Massage Therapy in Canada. This will support labour mobility between Alberta and other provinces.

## **SECTION 9 - COST BENEFIT ANALYSIS**

*Costs and Benefits of regulating the profession, including the expected effect on practitioner availability and on education and training programs, the expected effect of quality of service and the expected effect on process, access, and service delivery.*

### **Cost of the College**

We are aware of the responsibility to establish a preliminary budget and funding model for the transition period. To this end we have created a document attached as Appendix 1 entitled *Budgetary*

*Planning and Proposal for the College of Massage Therapy of Alberta.* This document lays out the financial plan for the Transition Period leading up to proclamation of the act to regulate massage therapy.

Once proclaimed, the College of Massage Therapy of Alberta's operational costs would be supported financially through annual registration fees as Massage Therapists transition into the CMTA. This is outlined in Appendix 1 – *Budgetary Planning and Proposal for the College of Massage Therapy of Alberta* under the section "Budget and Proposed Fees for the First Year of College Operation". Fees would be set accordingly. As per one example used in Appendix 1 7110 registrants multiplied by a first-year annual fee of \$915 would generate a first-year income of \$6,505,650. More details are included in Appendix 1.

It will be the responsibility of the Council of the CMTA to establish annual registration fees and other fees. However, depending on the cost of operating the College and the ultimate number of registrants, some Massage Therapists may need to pass increased costs on to the public purchasers of their services. Increased professional costs would be minimal as liability and medical mal-practice insurance as well as other benefits are provided through member Associations and therefore not required to be purchased through the CMTA.

### **Cost Benefit to the Province and Massage Therapists**

There is research that supports the reduction of primary health care costs through preventative therapies or practices such as massage therapy. Massage therapy is effective in reducing stress, increasing mobility, reducing and managing pain, enhancing healing from trauma and surgery, improving the quality of sleep, and maintaining functional activities of daily life. This therapeutic treatment also reduces the demand for medical treatment and prescription drugs, particularly opioids, when used as pain management treatment.

Other health professions already work in an integrated fashion with Massage Therapists. For example, Massage Therapists, Chiropractors and Physiotherapists already work collaboratively in the same clinics with the same patients. It is anticipated that this collaboration would expand to include other areas within the health professions and health system as well.

### **Education and Training**

In regulated Canadian jurisdictions the massage profession has moved away from the arbitrary practice of using hours and/or years of education to measure practice competency, replacing it with a series of initial competency examinations prior to entrance into a regulated body based upon the *IJPCPI*.

Therefore, we propose that the CMTA would use as its guideline the nationally accepted competency based *IJPCPI* to establish consistency in educational programs. A minimum requirement of competency-based education will ensure safety, consistency, and competency within the profession and increase public confidence.

As the transition plan encapsulates all existing massage practitioners within the province, as detailed above, there is no expected change to practitioner availability for the public.

### **Enhancement of Quality of Service**

We expect that the creation of a regulatory body for massage therapy in Alberta will enhance the quality of service by ensuring all massage therapists meet the entry-to-practice criteria which will be



required to register with the college. This will help the public and other health professionals in their ability to identify qualified and competent therapists.

### **Expected Effect on Prices, Access, and Service Efficiency**

We anticipate that the College would have a positive effect on prices, access, and service efficiency. We believe that there may be greater consistency in pricing related to treatment, which is something that currently does not exist within the current unregulated environment. However, we also understand that there may be variations in fees depending on the location that the registrant is working in.

The establishment of a single regulatory body may also improve service efficiency through a reduction in denied extended health care insurance benefit claims. Further, patients may no longer require a prescription for massage therapy treatment to access their health insurance benefits. This may lead to a reduction in the number of visits that the public currently requires of the healthcare system to access these benefits, thus reducing the strain on the healthcare system.

An established College is also likely to increase access to massage treatment through direct referrals from other regulated health professions, enhancing the accessibility and availability for the public to massage treatment.

We do not foresee any negative effects that regulation of the massage therapy profession would have on the public.

### **Section 10 – Rationale for an Independent College vs. Amalgamation with an Existing College within Alberta**

All Massage Therapy Associations, that we are aware of, within the province of Alberta are in favour of the creation of an independent College of Massage Therapists. Letters of support are attached in Appendix 10, 11, 12, 13, and 14. Our rationale to regulate as a stand-alone regulatory body is based on the Doré framework (*Doré v Barreau du Québec*, 2012 SCC 12 [“Doré”]), which calls for deference to regulators' expertise in defining the public interest within their respective professions.

Massage therapy is a unique and individualized sector of healthcare with a clear, distinct, and identifiable scope of practice. This scope of practice focuses on health enhancement through methods like the manipulation and mobilization of tissues to impact positive changes on the musculoskeletal system, neurological system, and vascular system with the goal of rehabilitation, augmentation of physical function, and maintenance of health and wellness.

Although these principles and approaches to health are shared with several different practices, such as physiotherapy and chiropractic, the extent to which massage therapists address the assessment, treatment techniques and approaches, as well as home care, is uniquely their own. Being so distinctive, to support our specialized standards, it would be important for massage therapists to determine their own progression over that of another profession. Also, massage therapists do not diagnose as part of their practice and if they were to amalgamate with another profession that can, like physiotherapists or chiropractors, this may lead to confusion within the massage therapy profession and the public.

Additionally, public complaints as seen in other regulated massage jurisdictions vary greatly from those of other health professions, requiring a unique understanding. This is due to the vulnerability of patients, being partially or fully undressed for extended periods of treatment time. This represents distinctive risks that are unique to the massage therapy profession. A College designed specifically to address these distinctive risks would better serve public safety while facilitating the development of the practice. A

College that can uphold the draping standards that protect patients, while keeping safety of vulnerable sectors of the population in mind will help to strengthen the profession of massage therapy.

In March of 2022 there were 8,888 massage therapists in the province who would be able to register with the future College of Massage Therapists in Alberta. When compared with smaller Colleges, such as the College of Speech Language Pathologists and Audiologists, the College of Dietitians of Alberta, and the College of Registered Dental Hygienists of Alberta, the sustainability of this College would be financially viable (see Appendix 1). Other provinces such as Ontario, British Columbia, New Brunswick, Prince Edward Island, and Newfoundland and Labrador have all sustained a viable, separate College for the massage therapy profession.

A main concern regarding amalgamating with another College is due to the expected number of College registrants. In most cases in Alberta, this would exceed the total number of other professionals within the already established College. This may potentially overwhelm the amalgamating body, creating a possible imbalance that is not conducive to the function of the established College.

Another concern in amalgamating with an established College is the current CEO, Registrar, and Council would likely lack knowledge concerning clinical massage therapy. It is understood that a Registrar would continue in their existing role after amalgamation. A knowledge gap may lead to a misunderstanding of the nature of massage therapy, thus providing an unintentional inability to adequately support the profession. The current trend in the disciplinary process of remediation is to prescribe training and development of College registrants which may be impacted due to this lack of understanding. An example of a potential knowledge gap would be the standards of patient draping during a treatment. Lack of this knowledge, and the importance that it has to the safe practice of the profession, may lead to an increased risk to public safety. Additionally, there is concern that following an amalgamation there would be an initial lack of massage therapist representation on Council. Profession-led representation is currently supported by the Associations.

## **CONCLUSION**

In conclusion, please consider our application to regulate the profession of massage therapy in Alberta.

## **Appendix List**

- Appendix 1 – Budgetary Planning and Proposal for the College of Massage Therapists of Alberta
- Appendix 2 – Canadian Massage Therapist Regulatory College Massage Definitions
- Appendix 3 – Globe & Mail Article entitled *Sex Traffickers are Using Shell Companies to Launder Illicit Profits in Canada*<sup>3</sup>
- Appendix 4 – Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice – September 2016
- Appendix 5 – Modalities in Inter-Jurisdictional Practice Competencies and Performance Indicators
- Appendix 6 – Modalities Outside of Scope
- Appendix 7 – Modalities Requiring Additional Education
- Appendix 8 – Association Membership and Continuing Education Requirements Documents
- Appendix 9 – List of Massage Therapist Associations in Alberta with Contact Information
- Appendix 10 – Letters of Support from ARMTA
- Appendix 11 – Letter of Support from the Canadian Massage and Manual Osteopathic Therapists Association (CMMOTA)
- Appendix 12 – Letter of Support from the Certified Registered Massage Therapist Association (CRMTA)
- Appendix 13 – Letter of Support from the Massage Therapists Association of Alberta (MTAA)
- Appendix 14 – Letter of Support from the Natural Health Practitioners of Canada Association (NHPC)
- Appendix 15 – Comprehensive Modality Comparison Document

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<sup>3</sup> <https://www.theglobeandmail.com/business/article-human-trafficking-shell-companies-money-laundering/>

**APPENDIX 1**

**BUDGETARY PLANNING AND PROPOSAL FOR THE COLLEGE OF  
MASSAGE THERAPISTS OF ALBERTA**

## **Budgetary Planning and Proposal for the College of Massage Therapy of Alberta**

### **Preamble**

In looking to prepare for the eventual future of a regulatory body for Massage Therapists in Alberta, the Alberta Working Group for the Regulation of Massage Therapy has undertaken the process of developing a budgetary plan which covers two stages. The first stage, which we have called the Transitional Stage, takes place starting with the introduction of legislation to regulate the profession and concludes when proclamation of the act occurs, and the College officially comes into existence. The second stage, which we have called The First Year of College Operations, begins with the proclamation of the act, and would conclude with the end of the first fiscal year of the College.

We would like to acknowledge that as with every proposed budget, the numbers provided below are an educated best guess, and are not set in stone, but will serve to provide guidance to the transitional body which will come into existence once legislation is introduced. The members of the Alberta Working Group for the Regulation of Massage Therapy remain committed to the establishment of a Regulatory College for Massage Therapy in Alberta.

### **Budgets for Transitional Stage**

In seeking to establish a budget, together with a funding model for the Transitional Stage, there were several principles which we took into consideration:

- The establishment of a College should be paid for by its future registrants – so as not to place any individual Association at an advantage or disadvantage based on the ability to contribute funds to the establishment of the College
- That all future registrants will not gain any advantage by delaying entrance into the society that will become the College upon Proclamation.
- That budgeting in such a way that may provide some monetary reserves, rather than debts, to the first year of College existence would be preferred.
- That we are currently in a period of significant inflation, and that we are basing these numbers on 2022 costs, and that those costs are likely to increase.
- That some costs should be considered to be a one time expense, and not a yearly ongoing operating expense, and that separating these two components out into two separate budgets would be beneficial in establishing a funding model.
- That in other models both inside and outside of the Province of Alberta for the establishment of a College, the time necessary between passage and proclamation of an Act is often determined by the availability of funding during the transitional process.

As such for the transitional stage we have established two separate budgets. The first is what we refer to as the Transitional Start-up Costs Budget. The second is a Transitional Annual Operating Budget.

The Transitional Start-up Costs budget includes all of the forecasted one-time expenditures that we see being necessary in order to set the College up for day one of its operations. As we developed this budget the decision was made to split it into three phases, to best plan for a funding model. In the pages that follow you will find detail on each of these phases.

## PHASE 1 Transitional Startup Costs Budget

Phase 1 of the Transitional Start-up Costs Budget are represented in the table below. This phase begins with the introduction of legislation and concludes once the Transitional Society is ready to begin receiving registrants. This first phase budget is the anticipated necessary one-time expenses to get the Transitional Society established and ready to begin receiving registrants. Along with numbers you will also find explanations of each line item in the column beside.

Phase 1 EXPENSES	Amount in \$	Assumptions
<b>Office Setup</b>		
Telephone/Fax	0	<b>Telephone and Fax</b> - Cell phone to be used by registrar - no need for any infrastructure
Website Development & Database Integration	7000	<b>Website and Database Integration</b> - 10 K would be the development costs for the website. This has been split between phase 1 (7K) and phase 2 (3K). Phase 1 would involve development for website that has integration capabilities with the Registration System.
Google/Cloud/Dropbox	384	<b>Google/Cloud/Dropbox/Email System</b> - Assume costs of initial setup for these services with 2 email addresses: one for information and one specific to registrar. External Cloud storage in Canada. These costs are based off a \$16 per month per user price point.
Damage Deposit - Rent	0	<b>Damage Deposit</b> - No Expense in this phase as registrar to work from home
Photocopy/Fax/Printers	500	<b>Photocopy/Fax/Printer</b> - assumption 1 laser printer with color capabilities
Office Supplies	500	<b>Office Supplies</b> - initial allowance for office supplies (paper, pens, alligator clips, staplers, etc.) for 1 Person
Database/Registration System Development	40000	<b>Registration System Development</b> - Initial costing sets us at \$40K for the complete system build - Alinity is the company that we are basing this off of. Would come with an estimated monthly cost of \$1000 for support/maintenance, which is what has been included in the Transitional Operating Budget.
Computer Software	0	<b>Computer Software</b> - assumption is that most software is a monthly or annual subscription fee, and that it then would be covered under the annual operational budget. No additional expenditure included at this phase.
Computer Hardware	2800	<b>Computer Hardware</b> - assumption is that 1 computer system would be purchased for the registrar - Laptop, 2 Monitors.
Office Furniture	1000	<b>Office Furniture</b> - assumption that the registrar works from home, expense allowance for office furniture of \$1000 for registrar.
<b>Policy Development</b>		
Complaints and Discipline	0	<b>Complaints and Discipline Policy Development</b> - to

Policy Development		be developed in Phase 2 - no expense
Continuing Education Program/Policy Development	0	<b>Continuing Education Program/Policy Development</b> - to be developed in Phase 2 - no expense
Policy Development (Admin)	0	<b>Policy Development (Admin)</b> - Initial development of Administrative Policies to be covered in house by registrar and/or transitional council
Policy Development (Registrant)	0	<b>Policy Development (Registrant)</b> -None in Phase 1
Quality Assurance Tools and Resources	0	<b>Quality Assurance Tools and Resources</b> - to be developed in Phase 2 - no expense
<b>Exam Development</b>		
Entry to Practice Exam Development	0	<b>Jurisprudence Exam Development</b> - to be developed in Phase 2 - no expense
Jurisprudence Exam Development	0	<b>Entry to Practice Exam Development</b> - to be developed in Phase 2 - no expense
<b>Staff/Council/Committee Training</b>		
Complaints and Discipline Training	0	<b>Complaints and Discipline Training</b> - None in Phase 1
Council and Committee Training	0	<b>Council and Committee Training</b> - council training only in Phase 1 – done in house no cost.
Staff Training	0	<b>Staff Training</b> - budget in phase 1 would be for initial training in Registration System. Assumption here is that the training would be included in the cost of the software.
<b>Other</b>		
School Approval System	0	<b>School Approval System</b> - No cost expected in Phase 1
Continuing Education Courses Development	0	<b>Continuing Education Courses Development</b> - to be developed in Phase 2 - no expense
Therapist Education/Marketing	0	<b>Therapist Education/Marketing</b> - in phase 1, preparation of materials to encourage registration with the Transitional Society handled internally by the registrar.
Transitional Marketing (non therapist stakeholders)	5000	<b>Transitional Marketing (non therapist stakeholders)</b> - communications with the schools as to the expectations (PCPI's) for successful completion of entrance exams.
Staffing	50000	<b>Staff</b> - here the assumption is that there may be a period of up to 6 months where a registrar may be hired before any registrants join assuming a annual salary of \$100K (payroll expenses included)
Consulting Resources for College Set-up	10000	<b>Consulting Resources for College Set-up</b> - possibility for setup of admin policy, oversight of hiring process of registrar, added 100 hours at \$100/hr
Contingency Fund (10% of	11719	<b>Contingency Fund (10% of other expenses total)</b>

other expenses total)		
<b>Expenses Total for Phase 1</b>	128903	

The funding model for phase one would be divided between a \$40,000 loan from Alinity for development of the Database and Registration System, and an additional \$88,903 in no interest or low interest loans provided by the Associations. All loans would be repaid based on terms that will be determined at the time of loan securement, and repayment will be funded through registrant application fees required to join the transitional society. Further details on the entire funding model are provided below.

### Phase 2 Transitional Startup Costs Budget

Phase 2 of the Transitional Start-up Costs Budget are represented in the table below. This phase begins with the opening of applications for registrants to join the transitional society and will conclude once the government has confirmed the 90-day window prior to proclamation. We anticipate the length of time of Phase 2 to be somewhere between 2-5 years and will largely be dependant on funding that will be necessary to complete the required work during this phase. This second phase budget is the anticipated necessary one-time expenses which will be necessary to complete all required regulations, policy, and programs that will need to be developed in readying the future College for proclamation.

<b>Phase 2 EXPENSES</b>	<b>Amount in \$</b>	<b>Assumptions</b>
<b>Office Setup</b>		
Telephone/Fax	600	<b>Telephone and Fax</b> - Hardware for Office staff of 3
Website Development & Database Integration	3000	<b>Website and Database Integration</b> - Phase 2 Costs Assume a setup of webpage with registrant access to registrant portal.
Google/Cloud/Dropbox	3168	<b>Google/Cloud/Dropbox/Email System</b> - Assume expansion costs to move to 4 email capacity and Cloud capacity for office operations based in Canada. \$16/month/per user for 4 users,; includes 1TB of data per person . A physical server for backup/storage at \$200 a month. A virtual server can also be setup through AWS or Azure but it is priced per database call and would be expensive at this time.
Damage Deposit - Rent	10500	<b>Damage Deposit</b> - Assume office space rental with space for 3 employees in Edmonton (3 Offices, Reception Area, Lunchroom and File Room) - Total 1200 SF Net rent \$14 to \$18 Op costs \$12 to \$17 Allowance \$25 to \$50 depending on term length 5-10 years 3 months gross rent deposit 2-4 months of net free rent 3 months pre term fixturing period  You can pass along my contact information if needed.



		Thanks, Karnie Vertz Principal AVISON YOUNG D 1 780 429 7551 C 1 780 938 7551
Photocopy/Fax/Printers	1800	<b>Photocopy/Fax/Printer</b> - assumption rental of office printer - startup costs only - Rental of machine such as KONICA MINOLTA - BIZHUB C258, @\$150/month
Office Supplies	1000	<b>Office Supplies</b> - assumption of cost of supplies for 2 additional staff members at \$500 ea.
Database/Registration System Development	0	<b>Registration System Development</b> - assumption that this would be completed in Phase 1
Computer Software	0	<b>Computer Software</b> - budget for any software not usually done through subscription - examples may include photo editing software or publishing software used to create promotional materials, etc. - Creative Cloud All Apps: CAD \$111.99 /mo./license.  Or use publisher, and other MS office software plus the free version of Canva
Computer Hardware	8400	<b>Computer Hardware</b> - assumption is that 3 additional computer systems would be purchased - desktops with 2 monitors for each office.
Office Furniture	18200	<b>Office Furniture</b> - to outfit 3 office spaces (Desk, Office Chair, 2 Visitor Chairs, Filing Cabinet, Decor - \$2800 ea.), reception (4 waiting room chairs, 2 end tables and decor - \$1800), lunchroom (small lunch table with 4 chairs, fridge, microwave, other appliances including coffee maker & dishwasher etc., Dishes & Cutlery, decor - \$5000) , copy/file room (8 double filing cabinets & decor - \$4500). Assumption that most council meetings would take place via Zoom, and that in person Board Meetings would take place at a rented space.
<b>Policy Development</b>		
Complaints and Discipline Policy Development	100000	<b>Complaints and Discipline Policy Development</b> - development of policy. After receiving feedback from CMTO regarding their policy development, etc., the determination was made to set the creation for policies at \$100000 each
Continuing Education Program/Policy Development	100000	<b>Continuing Education Program/Policy Development</b> - After receiving feedback from CMTO regarding their policy development, etc., the determination was made to set the creation for policies at \$100000 each
Policy Development (Admin)	100000	<b>Policy Development (Admin)</b> - Completion of Administrative Policy. After receiving feedback from

		CMTO regarding their policy development, etc., the determination was made to set the creation for policies at \$100000 each
Policy Development (Registrant)	100000	<b>Policy Development (Registrant)</b> - Completion of all Registrant policy. After receiving feedback from CMTO regarding their policy development, etc., the determination was made to set the creation for policies at \$100000 each
Quality Assurance Tools and Resources	500000	<b>Quality Assurance Tools and Resources</b> - program and policy to be developed. CMTO has recently undergone an extensive development of their QA program and estimate their cost on this multiyear project to have been around \$1M. For our budgeting purposes, the committee thinks that this was excessive and suggest a budget of \$500,000 based on the idea of using a consultant in the development of this program - this would allow for 2500 hours of work at a \$100/hr. cost and 500 hours of legal at \$500/hr. cost. This piece is ongoing in looking at proposals from another College
<b>Exam Development</b>		
Entry to Practice Exam Development	200000	<b>Entry to Practice Exam Development</b> - development of exams, both written and practical. CMTO cost to develop their MSQ exam was \$200,000. OSCE exam would be in addition to this, however the hope from the committee is that we will be able to find cost savings on both of these by piggy backing off of either CMTBC or CMTO.
Jurisprudence Exam Development	100000	<b>Jurisprudence Exam Development</b> - development of exam. CMTO cost to develop their jurisprudence exam was \$100,000 so the committee decided to go with that.
<b>Staff/Council/Committee Training</b>		
Complaints and Discipline Training	0	<b>Complaints and Discipline Training</b> - None in Phase 2
Council and Committee Training	0	<b>Council and Committee Training</b> - council training only in Phase 2 done in house
Staff Training	0	<b>Staff Training</b> - budget in phase 2 would be for additional training in Registration System as system expands, training for new employees related to their roles as required. Assumption here is that training would be included with the cost of software
<b>Other</b>		
School Approval System	10000	<b>School Approval System</b> - Development of Policy surrounding need for all schools to complete the Accreditation Program set out through CMTCA

Continuing Education Courses Development	125000	<b>Continuing Education Courses Development</b> - development of mandatory courses for first CEC cycle (Ethics, Jurisprudence, Techniques, Anatomy, Documentation) - assumes the cost of video development of course along with appropriate testing requirements following course completion - \$25,000 per course complete.
Therapist Education/Marketing	92000	<b>Therapist Education/Marketing</b> - in phase 2 - 4 in person information sessions (Edmonton, Calgary, Grand Prairie and Lethbridge) - this is calculated at a cost of \$13,000 per event which includes cost of event venue, cost to have registrar and 2 members of transitional council from each association present at the meetings including assumed 2 night hotel stay at each venue + travel costs + meals. Marketing to promote registration assumes 1 physical mailout to all therapists at estimated cost of \$12,000. School visits (to be done by registrar) - estimated cost of \$500 per school (we allowed for 50 schools) which includes travel and meals costs. Conference/tradeshow attendance - registrar to attend each of the five Associations conference/tradeshow, with estimated cost at \$1000. Banners - 6 @ \$500 ea.
Transitional Marketing (non therapist stakeholders)	5000	<b>Transitional Marketing (non-therapist stakeholders)</b> - communications with the schools as to the expectations (PCPI's) for successful completion of entrance exams, and other stakeholders.
Staffing	0	<b>Staff</b> - No Cost During This Phase - all staffing costs are part of the Annual Operating Budget
Consulting Resources for College Set-up	90000	<b>Consulting Resources for College Set-up</b> - possibility for setup of all policy and programs described above - added 900 hours at \$100/hr.
Contingency Fund (10% of other expenses total)	181867	<b>Contingency Fund (10% of other expenses total)</b>
<b>Expenses Total for Phase 2</b>	1750535	

The funding model for phases 2 and 3 is that registrants of the Transitional Society will provide the funding for start up costs through a one time registration fee. This fee will be non refundable, and payment will be required of registrants in order to apply to join the Transitional Society. Further details on the entire funding model are provided below.

### **Phase 3 Transitional Startup Costs Budget**

Phase 3 of the Transitional Start-up Costs Budget are represented in the table below. This phase begins with confirmation from the Government that the Act establishing the College is ready to be proclaimed and covers the necessary one-time expenses during the 90 days immediately prior to proclamation of the act. This will allow for the hiring, onboarding, and training of necessary staff, and the establishment of a physical College location to be ready for full operation on the day the Act is proclaimed.

Phase 3 EXPENSES	Amount in \$	Assumptions
<b>Office Setup</b>		
Telephone/Fax	1600	<b>Telephone and Fax</b> - Hardware for Office staff of 11
Website Development & Database Integration	0	<b>Website and Database Integration</b> - no costs assumed at this phase (Completed in Phase 2)
Google/Cloud/Dropbox	20304	<b>Google/Cloud/Dropbox/Email System</b> - Assume expansion costs to move to 12+ email capacity and Cloud capacity for office operations based in Canada.
Damage Deposit - Rent	13750	<p><b>Damage Deposit</b> - Assume office space rental with space for 11 employees in Edmonton (11 office spaces, lunchroom, file/copy room, reception, board room), and costs to move from existing space - \$5,000 allowance). Assuming that the damage deposit from first rental is returned completely. Net rent \$14 to \$18 Op costs \$12 to \$17 Allowance \$25 to \$50 depending on term length 5-10 years 3 months gross rent deposit 2-4 months of net free rent 3 months pre term fixturing period</p> <p>You can pass along my contact information if needed.</p> <p>Thanks, Karnie Vertz Principal AVISON YOUNG D 1 780 429 7551 C 1 780 938 7551</p>
Photocopy/Fax/Printers	2940	<b>Photocopy/Fax/Printer</b> - assumption possible upgrade rental of office printer - startup costs only - Upgrade machine to one like KONICA MINOLTA - BIZHUB C458, @245/month
Office Supplies	4000	<b>Office Supplies</b> - assumption of cost of supplies similar for 8 additional staff members @ \$500 ea.
Database/Registration System Development	0	<b>Registration System Development</b> - assumption that this would be completed in Phase 1.
Computer Software	0	<p><b>Computer Software</b> - budget for any software not usually provided through subscription - Creative Cloud All Apps: CAD \$111.99 /mo./license.</p> <p>Or use publisher, and other MS office software plus the free version of Canva</p>
Computer Hardware	26400	<b>Computer Hardware</b> - assumption is that 8 additional computer systems would be purchased - desktops with 2 monitors for each office, additional laptops for

		CFO, Media Coordinator.
Office Furniture	57000	<b>Office Furniture</b> - to outfit additional 8 office spaces (desk, office chair, 2 visitor chairs, décor, repurposed Filing Cabinet from Phase 2 File Room - \$2300 ea.), reception (add additional 4 chairs and 2 end tables - \$1800), lunchroom (replace table and chairs with 12 seat table and chairs - \$ 3600), copy/file room (built in filing cabinets - \$15,000) and boardroom (Board Table with 12 Chairs, Screen and Projector, Buffet, White Board, Flip Chart, Decor - \$9900), Hallway Decor (\$500), Restroom Decor (\$1000), internal signage (\$100 per room x 18 rooms - \$1800) external signage (\$5000).
<b>Policy Development</b>		
Complaints and Discipline Policy Development	0	<b>Complaints and Discipline Policy Development</b> - completed in Phase 2. No Cost Expected
Continuing Education Program/Policy Development	0	<b>Continuing Education Program/Policy Development</b> - completed in Phase 2
Policy Development (Admin)	0	<b>Policy Development (Admin)</b> - Completed in Phase 2
Policy Development (Registrant)	0	<b>Policy Development (Registrant)</b> - Completed in Phase 2
Quality Assurance Tools and Resources	0	<b>Quality Assurance Tools and Resources</b> - completed in phase 2
<b>Exam Development</b>		
Entry to Practice Exam Development	0	<b>Jurisprudence Exam Development</b> - completed in Phase 2.
Jurisprudence Exam Development	0	<b>Entry to Practice Exam Development</b> - Completed in Phase 2.
<b>Staff/Council/Committee Training</b>		
Complaints and Discipline Training	25000	<b>Complaints and Discipline Training</b> - 25000 set aside to produce video training program for Complaints and Discipline.
Council and Committee Training	25000	<b>Council and Committee Training</b> - council and committee training
Staff Training	25000	<b>Staff Training</b> - budget in phase 3 would be for training of new employees in the registration system - assumption here again is that this would be covered with the software, or at this point could be done in house by existing staff. Training specific to their individual roles in the College - we budgeted \$10,000 - assuming bringing in outside resources for training 5-10 days total.
<b>Other</b>		
School Approval System	0	<b>School Approval System</b> - No cost expected in Phase

		3
Continuing Education Courses Development	0	<b>Continuing Education Courses Development</b> - completed in phase 2. No cost.
Therapist Education/Marketing	5000	<b>Therapist Education/Marketing</b> - school visits only
Transitional Marketing (non therapist stakeholders)	50000	<b>Transitional Marketing (non-therapist stakeholders)</b> - communications with the schools as to the expectations (PCPI's) for successful completion of entrance exams, public education campaign preparation
Staffing	225000	<b>Staff</b> - During this phase there will be the addition of 9 staff members to the future College - assuming an average cost of \$100K per year per staff member this budget line represents a \$25K per new staff member cost during this phase which would not be accounted for in the Annual Operating budget for the Transitional Stage
Consulting Resources for College Set-up	0	<b>Consulting Resources for College Set-up</b> - completed in phase 2.
Contingency Fund (10% of other expenses total)	48100	<b>Contingency Fund (10% of other expenses total)</b>
<b>Expenses Total for Phase 3</b>	529094	

The funding model for phases 2 and 3 is that registrants of the Transitional Society will provide the funding for start up costs through a one-time registration fee. This fee will be non refundable, and payment will be required of registrants in order to apply to join the Transitional Society. Further details on the entire funding model are provided below.

### **Summary and Funding Model for Transitional Startup Costs Budget**

To Summarize – one-time costs budgeted for in this Transitional Startup Costs Budget are:

- Phase 1 - \$128,903
- Phase 2 - \$1,750,535
- Phase 3 - \$529,094

Bringing the total to \$2,408,532.

Now we turn to the funding model that we use to provide funding for these expected expenditures found in the Transitional Startup Costs Budget. As already stated above, the initial funding for phase 1 will be secured through loans, which will need to be repaid. As such we are not deducting any of those dollars from the total, as those loans will need to be repaid.

Keeping in mind the principle mentioned above that the establishment of the College should be funded by its future registrants, we make the following assumptions in regards to setting a registration fee that:

- In establishing a fee for registration, we be conservative in the number of therapists who will choose to transition into the College; and

- In March 2022, it was established that between the 4 Associations that are part of the AB Working Group, and the additional Association which has provided the TC-CMTA with a letter of support regarding the Regulation of the profession there were approximately 8888 active members of the profession in Alberta; and
- Not all current active members may choose to transition into the College, due to regular attrition, a choice to retire, or a choice to remain outside of the regulatory College.

As such, the decision was made to make the assumption for budgeting purposes that only 50% of the existing therapists in the province will make the transition. Operating with this assumption we then take the total budget (\$2,408,532) and divide it by the projected transition number of 4444 – which calculates to \$541.97, which for our purposes we have rounded up to \$542 – meaning that the established Registration Fee to join the Transitional Society, which will be used to fund the Transitional Startup Costs Budget would be set at \$542. Further details on the complete funding model are included below. This is just the first step toward that funding model.

### **Transitional Annual Operating Budget**

This budget has been established with the idea that it would be somewhat representative of an annual budget during phases 2 and 3 as described above – which would cover the period that begins with the Transitional Society starting to accept registrants, and end with proclamation, at which time all finances would transfer to the College.

Methodology: This annual budget was developed taking into account the shared operating budget from ACTA (Association of Counseling Therapy of Alberta) during their current transitional phase and taking into account information from the four associations who are part of the working group. It assumes that there would be up to 3 office staff working from an appropriate rented space during the transition stage prior to proclamation of the Act. Interest in the Revenue side is based on a calculation of an interest rate of 0.5% calculated over a 12 month period with consistent depreciation of funds over the 12 month period. (Initial amount divided by 2 and multiplied by 0.005)

For the purposes of providing potential forecasts based on the total number of members who might make the transition, 4 separate models are cast – which are covered in columns two through five below. The sixth column is based on the funding model which has been agreed upon in principle and is covered further below.

These models take the following assumptions into consideration:

- Council Renumeration - Rates Calculated at less than 4 hours - \$300, and more than 4 hours \$500 - Total calculated using 16 meetings per year with a split between full and half day meetings with assumption of 12 transitional council members (16 x 12 x 400)
- Loans - The reason that this is 0 is that the registrant application fees would cover the costs of any loans that would be accumulated under the Transitional Startup Costs Budget
- Annual Registrant Fees under 20% join based on the expense number would be \$341
- Annual Registrant Fees under 40% join based on the expense number would be \$171
- Annual Registrant Fees under 60% join based on the expense number would be \$114
- Annual Registrant Fees under 80% join based on the expense number would be \$86

	If Registrant Registration reaches 20% of eligible members (8888 as of March 30, 2022) - 1778	If Registrant Registration reaches 40% of eligible members (8888 as of March 30, 2022) - 3555	If Registrant Registration reaches 60% of eligible members (8888 as of March 30, 2022) - 5332	If Registrant Registration reaches 80% of eligible members (8888 as of March 30, 2022) - 7110	Based on Assumption that Registrant Registration reaches 50% of eligible members (8888 as of March 30, 2022) – 4444 within year one of Transitional Society Registration
<b>Revenue</b>					
Annual Registrant Fees	606298	607905	607848	611460	666600
Deferred Revenue	0	0	0	0	
Loans	0	0	0	0	
Grants	0	0	0	0	
Interest	1516	1520	1520	1529	1667
<b>Total Revenue</b>	<b>607814</b>	<b>609425</b>	<b>609368</b>	<b>612989</b>	<b>668267</b>
<b>Expenses</b>					
<b>Administrative Expenses</b>					
Depreciation	0	0	0	0	0
Telephone/Fax/Internet	2400	2400	2400	2400	2400
Bank Fees	600	600	600	600	600
Website & Basecamp	3000	3000	3000	3000	3000
Rent	30000	30000	30000	30000	30000
Photocopy/Fax/Printers	10800	10800	10800	10800	10800
Office Supplies	2400	2400	2400	2400	2400
Annual Audit	25000	25000	25000	25000	25000
Financial Services	60000	60000	60000	60000	60000
Legal Counsel	35000	35000	35000	35000	35000
Reproduction and Printing	1800	1800	1800	1800	1800
Postage and Courier	2400	2400	2400	2400	2400
Travel and Accommodation (Staff)	10000	10000	10000	10000	10000
Registrant Database Support	12000	12000	12000	12000	12000
IT Contractor/Support	12000	12000	12000	12000	12000



Software Subscriptions	1200	1200	1200	1200	1200
Insurance	20000	20000	20000	20000	20000
<b>Sub-Total</b>	<b>228600</b>	<b>228600</b>	<b>228600</b>	<b>228600</b>	<b>228600</b>
<b>Wages/Salaries</b>					
Personnel	200000	200000	200000	200000	200000
<b>Sub-Total</b>	<b>200000</b>	<b>200000</b>	<b>200000</b>	<b>200000</b>	<b>200000</b>
<b>Board/Council</b>					
Promotion and Public Education (includes social media and marketing)	15000	15000	15000	15000	15000
Meetings (Catering, Room, Equipment)	0	0	0	0	0
Travel and Accommodation (Council)	10000	10000	10000	10000	10000
Council and Committee Training	20000	20000	20000	20000	20000
Subscriptions/Memberships	0	0	0	0	0
Council Remuneration	76800	76800	76800	76800	76800
Strategic Planning/Consulting on Workplan	0	0	0	0	0
<b>Sub-Total</b>	<b>121800</b>	<b>121800</b>	<b>121800</b>	<b>121800</b>	<b>121800</b>
<b>Other</b>					
Loan Repayment	0	0	0	0	0
Contingency Fund - 10% of total annual expenses	55040	55040	55040	55040	55040
<b>Sub-total</b>					
<b>Total Expenses</b>	<b>605440</b>	<b>605440</b>	<b>605440</b>	<b>605440</b>	<b>605440</b>
<b>Revenue over Expenses</b>	<b>2374</b>	<b>3985</b>	<b>3928</b>	<b>7549</b>	<b>62827</b>

Ideally all Revenue over Expenses would be put into Reserve Funds, which would transfer to the College, setting it on good financial footing at the beginning of its establishment.

### **Funding Model for the Transition Stage**

In establishing a funding model there were several things which the working group considered:

- That all members of the profession be given the opportunity to join at the same price during the first year of the Transitional Society
- That a mechanism needed to be established that would encourage early buy in, as the funding for the establishment of the College needs to be borne by the future

registrants of the College, and that the sooner that the funding was available, the shorter likely the transitional stage will be.

- That all future registrants of the College be required to pay a registration cost that is not less than those who choose to join early.
- That setting the College up in such a way that there is a potential for monetary reserves at the time that the College begins operations would be prudent.
- For budgeting purposes it was assumed that a minimum of half of the practicing therapists will wish to join the College prior to legislation proclamation.
- That new graduates during the transitional stage are not immediately penalized because they were unable to join during the first year or subsequent years of the Transitional Society.

It should therefore be noted that the annual registrant fee that will be paid during the transition stage will be determined by the year in which a registrant chooses to join, and that under this proposal those fees will be locked at that rate.

Further it should also be noted that under this proposal all graduates of a massage therapy program that meets the grandparenting criteria will be eligible to apply at the first-year rates during the calendar year in which they graduate, however, if they fail to register within that year, their buy in cost will be equal to all others joining at the time.

<b>Year Joined</b>	<b>Application Fee (see * and ** below)</b>	<b>Annual Registrant Fee</b>	<b>Total "Buy In Cost"</b>
1	\$542.00	\$150.00	\$692.00
2	\$692.00	\$250.00	\$942.00
3	\$942.00	\$300.00	\$1,242.00
4	\$1,242.00	\$350.00	\$1,592.00
5	\$1,592.00	\$400.00	\$1,992.00
At Proclamation *** the application fee will be determined based on the year in which proclamation occurs, and would be the current years current "buy in cost" PLUS \$250 - This model would assume proclamation during year 5 following the date of applications opening to join the transitional society.	\$2,242.00	\$915.00	\$3,157.00

\* Year One Application Fee is based on the Startup Cost Budget being divided by half of the March 2022 Membership Number of 8888 joining the transitional society prior to proclamation

\*\* Year Two Application Fee and beyond are based on the previous year's application fee plus the annual registrant fee from each previous year (aka Total "Buy in Cost"). This is done so that all future registrants of the College pay equal entrance fees prior to proclamation. It should be noted that the annual registrant fee is locked in based on the

year joined, and that the fee increases for every year that a registrant waits to join the transitional society - this is done to encourage early participation in the transitional society, and to use those funds to complete the work required by the transitional society to ready the College for proclamation of the act.

\*\*\* Application Fees at the time of proclamation will be based on the "Buy in Cost" for the year in which it occurs PLUS \$250. This application fee is meant to remain in place going forward in order to initially pay for any outstanding debts related to setting up the College operations, and to build operational and capital reserves for the future operations of the College.

Under this funding model, if 50% of the current practicing massage therapists (4444) were to join in the first year, the transitional stage would be fully funded, based on the budgets provided above.

### **Budget and Proposed Fees for the First Year of College Operations**

We want to acknowledge that this is a high-level rather than detailed budget. Actual detailed budget for the first year of College Operations should be developed by the Transitional Council together with Administration in the lead up to proclamation of the College.

Methodology in Development - this budget was developed by looking at the 2019 and 2020 financial statements of both the College of Massage Therapists of Ontario and the College of Massage Therapists of British Columbia. From each of those years we broke down the financial statements' expenses portion into a cost per registrant/member based on the registrant/member numbers reported in the annual reports from the same years. We then took an average of those 4 years of data to establish a cost per registrant.

Registration Fees - These were developed taking the subtotal of expenses and dividing them by the number of College Registrants - rounded up to the nearest dollar. Annual Registration fee for the first year is budgeted at \$915 per registrant.

Examination Fees - These were developed on the assumption that 600 students would write the exam to join the College in the first year and is based on the expected costs of the examination process. This is based on an expected rate of \$1500 per exam, which matches the expense listed below. The reasoning behind this is the philosophy that the examination costs should be borne by the applicant, not the existing registrants of the College.

Registration Application Fees - This number is currently set at 0 because until such a time as proclamation has occurred, the application fee would not be set. Application Fees at the time of proclamation will be based on the "Buy in Cost" for the year in which it occurs PLUS \$250. All Funds from this application fee would first be appropriated for debt repayment until such time that all loans are repaid, at which point these funds would be moved into College reserves. This number (once it is able to be confirmed) should then to be multiplied by 450, with the presumption of passing of the entrance examination being placed at 75%.

Loan Repayment Expense - If debt exists at the time of proclamation, this is equal to the Registration Application Fees up to the total cost of all remaining debts.

Examination Expenses - These were developed based on the costs per new registrants/members on the 2019/2020 CMTO and CMTBC on average - the amount has been determined based on an expected 600 examinations delivered in year 1 at a cost of \$1500 per exam.

Reserves Funding – This is zero because it would be anticipated that any outstanding debts would be repaid first under Loan Repayment Expense. If leading up to the time of proclamation this was different and Regular Application Fees were not needed to pay down outstanding loans, then this number should be adjusted to reflect.

Interest Revenue – Assumes 0.1% interest rate on operating funds as they depreciate through the year for all funds on deposit.

This budget assumes that all initial capital spending has been completed under the Transitional Society, and the College is up and fully functional on the day which the act comes into force, and that such spending has been covered either through the securing of loans, or through revenue generated through society registrant registration application and yearly renewal fees.

Below please find a table with budgeted amounts. The second column is the per registrant costs based on an average of the years examined as listed below. It contains no revenue numbers as we did not compare revenue, but only looked at expenses. The goal would be to have expected revenue cover expenses and provide a balanced annual budget for the College.

First Year College Budget:

	Yearly Average cost per registrant based on combined totals from CMTO and CMTBC of all four examined years (2019 & 2020) divided by 4	First Year Budget based on 40% of the March 30, 2022 registrants joining the College (8888/40) - meaning 3555 registrants at the start of year 1	First Year Budget based on 60% of the March 30, 2022 registrants joining the College (8888/60) - meaning 5332 registrants at the start of year 1	First Year Budget based on 80% of the March 30, 2022 registrants joining the College (8888/80) - meaning 7110 registrants at the start of year 1
<b>Revenue</b>				
Annual Registration Fees (see notes above)		3252825	4878780	6505650
Examination Fees (see notes above)		900000	900000	900000
Registration Application Fees (see notes above)		0	0	0
Interest (see notes above)		1627	2440	3253

Total Revenue		4154452	5781220	7408903
<b>Expenses</b>				
Office and Administration	412.73	1467256	2200677	2934511
Complaints & Discipline	187.39	666172	999164	1332343
Quality Assurance	176.20	626391	939499	1252782
Governance (Council and Committees)	19.30	68612	102908	137223
Communications and Publications	9.08	32280	48415	64559
Title Protection	1.79	6364	9545	12727
Contributions to National Initiatives	24.98	88804	133194	177608
10% Contingency Fund (for expenses unknown)	83.15	295588	443341	591176
Subtotal of Expenditures		3251467	4876743	6502929
Entrance Examinations	1501.72	900000	900000	900000
Loan Repayment (see notes above)		0	0	0
Reserves Funding (see notes above)		0	0	0
<b>Total Expenses</b>		4151467	5776743	7402929
<b>Revenue Over Expenses</b>		2985	4477	5974

**APPENDIX 2**  
**CANADIAN MASSAGE THERAPIST REGULATORY COLLEGE**  
**DEFINITIONS**

# Canadian Massage Therapist Regulatory Colleges

## Massage Therapy Definitions

### College of Massage Therapists of British Columbia (CMTBC)

"Massage therapy" means the health profession in which a person provides, for the purposes of developing, maintaining, rehabilitating or augmenting physical function, or relieving pain or promoting health, the services of:

- (a) assessment of soft tissue and joints of the body, and
- (b) treatment and prevention of physical dysfunction, injury, pain and disorders of soft tissue and joints of the body by manipulation, mobilization and other manual methods.

Link: [https://www.bclaws.gov.bc.ca/civix/document/id/lc/statreg/280\\_2008](https://www.bclaws.gov.bc.ca/civix/document/id/lc/statreg/280_2008)

### College of Massage Therapists of New Brunswick (CMTNB)

The practice of massage therapy is the assessment of the soft tissues and joints of the body and the treatment and prevention of physical dysfunction and pain of the soft tissues and joints by mobilization to develop, maintain, rehabilitate or augment physical function, or relieve pain, and does not include manipulation or movement of the spine or the joints of the body beyond an individual's usual physiological range of motion, using a high velocity, low amplitude thrust.

Link: <https://www.cmtnb.ca/wp-content/uploads/2022/10/the-massage-therapy-act-ch-49.pdf>

### College of Massage Therapists of Newfoundland & Labrador (CMTNL)

"Massage therapy" means the assessment of the soft tissue and joints of the body and the treatment and prevention of physical dysfunction and pain of the soft tissues and joints by manipulation to develop, maintain, rehabilitate or augment physical function or to relieve pain or to promote health.

Link: [https://www.cmtnl.ca/wp-content/uploads/2019/06/massage\\_therapy\\_act.pdf](https://www.cmtnl.ca/wp-content/uploads/2019/06/massage_therapy_act.pdf)

### College of Massage Therapists of Ontario (CMTO)

The practice of massage therapy is the assessment of the soft tissue and joints of the body and the treatment and prevention of physical dysfunction and pain of the soft tissues and joints by manipulation to develop, maintain, rehabilitate or augment physical function, or relieve pain.

Link: <https://www.ontario.ca/laws/statute/91m27>

### College of Massage Therapists of Prince Edward Island (CMTPEI)

"Massage therapy" means the assessment of the soft tissue and joints of the body and the treatment and prevention of physical dysfunction and pain of the soft tissues and joints by manipulation to develop, maintain, rehabilitate or augment physical function, relieve pain or promote health.

Link: [https://www.princeedwardisland.ca/sites/default/files/legislation/r10-1-5-regulated\\_health\\_professions\\_act\\_massage\\_therapists\\_regulations.pdf](https://www.princeedwardisland.ca/sites/default/files/legislation/r10-1-5-regulated_health_professions_act_massage_therapists_regulations.pdf)

**APPENDIX 3**

**GLOBE & MAIL ARTICLE**

***SEX TRAFFICKERS ARE USING SHELL COMPANIES TO LAUNDER  
ILLCIT PROFITS IN CANADA***



EXCLUSIVE

# Sex traffickers are using shell companies to launder illicit profits in Canada

New research sheds light on how hundreds of potentially illicit massage parlours hide their money and the vulnerable people they prey on

**RITA TRICHUR >**

PUBLISHED MARCH 10, 2023

This article was published more than 1 year ago. Some information may no longer be current.



## **Resources** • Who to call to report sex trafficking in Canada

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Sex trafficking is one of the toughest crimes to investigate. But now, new groundbreaking methods are exposing criminal hot spots across Canada long hidden from view.

According to a new data analysis by Thomson Reuters Special Services, LLC, transnational criminals who reap billions of dollars in sordid profits appear to be operating at hundreds of illicit massage parlours in the country.

TRSS, a subsidiary of Thomson Reuters Corp., identified 700 such businesses as part of their Canadian case study. The company uses data and technology to help law enforcement and government agencies identify and nab criminals involved in human trafficking – a complex crime that involves the recruitment, transport and control of vulnerable individuals.

(Woodbridge Co. Ltd., the Thomson family holding company and controlling shareholder of Thomson Reuters, also owns The Globe and Mail.)

TRSS's findings – which were shared exclusively with The Globe and will be provided to law enforcement agencies across Canada this week – were based in part on an in-depth assessment of data scraped from online review boards used by men to find Canadian businesses that provide “happy ending” sexual services.

Various police agencies are expected to use the TRSS research to launch new sex-trafficking investigations or augment their existing probes.

The case study's preliminary findings, however, indicate that criminals who exploit susceptible women and girls are also using Canadian shell corporations to wash the proceeds of their crimes.

That long-standing money-laundering technique is effective because there are millions of these private companies and no public information about their owners – underscoring why economic-crime experts are urging Ottawa and the provinces to move quickly to create a comprehensive corporate registry covering all of Canada.

Without it, law enforcement will continue to have limited information to investigate these crimes. “There’s so much money that’s being made in the informal or shadow economy that we are just barely scratching the surface,” said Heather Fischer, senior adviser for human rights crimes at TRSS, who previously served as the White House special adviser for human trafficking.

It is estimated that illicit massage businesses in Canada and the United States together generate proceeds of roughly US\$2.5-billion a year, she said.



Heather Fischer is senior advisor for human rights crimes at Thomson Reuters Special Services.  
DEE DWYER/THE GLOBE AND MAIL

Now a widely-predicted recession could give those criminal enterprises a boost.

A 2022 report by the World Bank and the International Organization for Migration includes an analysis that shows how economic shocks lead to higher unemployment, which in turn, puts increased “pressure on individuals and households to pursue riskier livelihoods and survival strategies” to find new income.

“The risk of this increasing and growing in a recessionary environment is

much more profound than we probably can even imagine,” said Stuart Davis, executive vice-president, financial crimes risk management and group chief anti-money laundering officer at the Bank of Nova Scotia.

As economic challenges deepen, people face dire situations as they struggle to pay their bills and homelessness increases, he added.

“Many of the people who are being exploited actually have kids, so they’re looking to take care of their families,” Mr. Davis said.

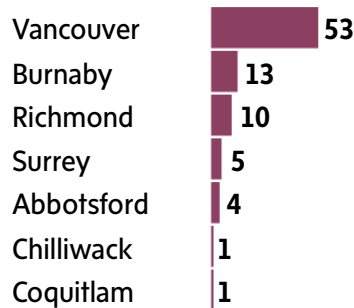
“I think we often forget the children that are impacted in this and they themselves become targets for exploitation.”

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### Number of potentially illicit massage businesses across Canada

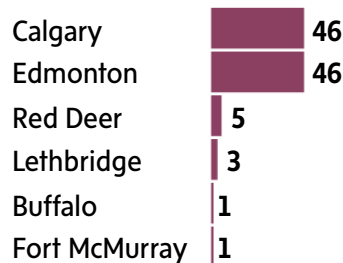
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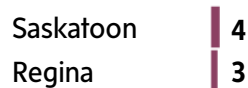
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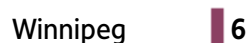
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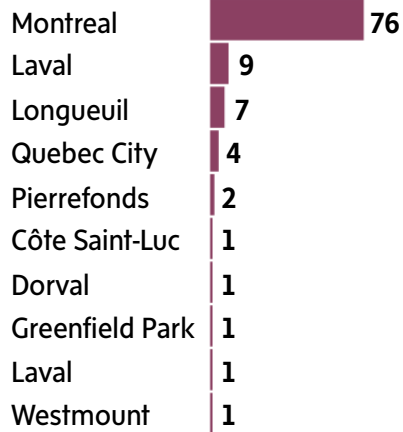
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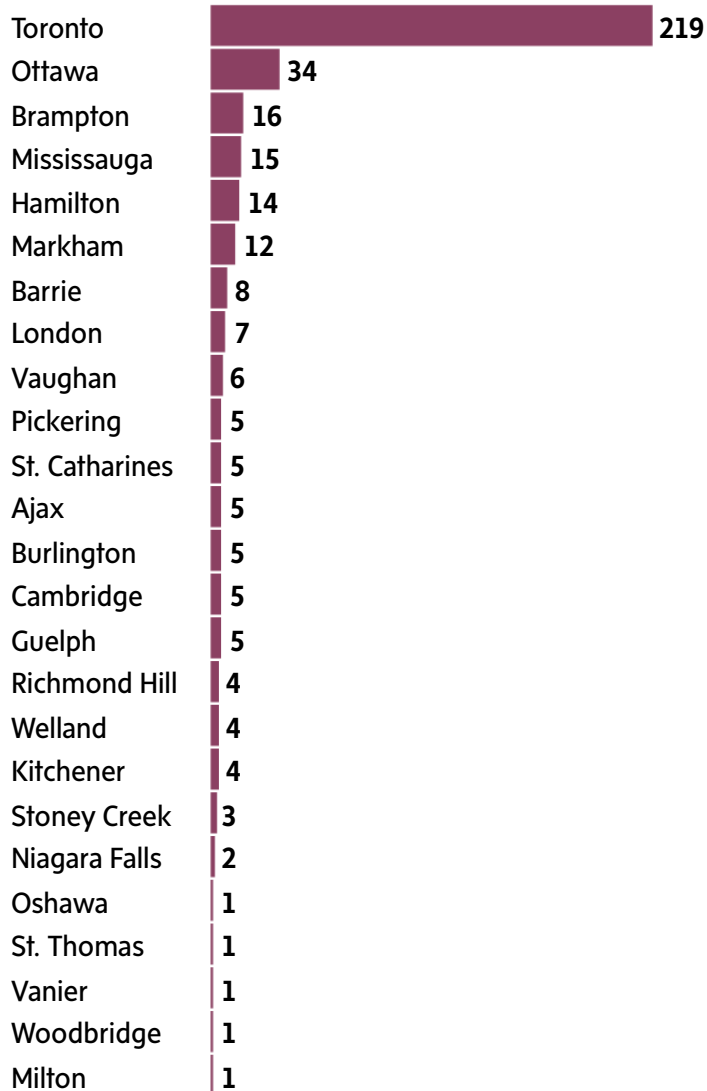
**QUEBEC: 103**

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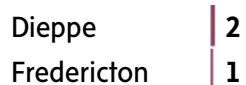
**ONTARIO: 383**

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**NEW BRUNSWICK: 3**

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Note: Data represented in the above charts are publicly available and collected from open-source websites. The data may include businesses that are closed, inactive, or no longer conducting illicit operations. The data was accessed on Jan. 10, 2023

THE GLOBE AND MAIL, SOURCE:  
THOMSON REUTERS SPECIAL SERVICES, LLC

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The 700 suspected illicit massage parlours identified by TRSS – their list includes both licensed and unlicensed businesses – were found in every province except Nova Scotia and Prince Edward Island.

Although many establishments were located in major metropolises such as Toronto, Montreal and Vancouver, others were pinpointed in smaller cities – places like Chilliwack, B.C., St. Thomas, Ont., and Dieppe, N.B.

Additionally, TRSS identified 41 individuals – or possible owners – associated with those businesses.

Sex traffickers who register their businesses do so to create the illusion of commercial legitimacy as they sell sex.

Moreover, some proprietors own more than one establishment.

“These are not just stand-alone strip mall entities,” said Derek Benner, managing director of federal law enforcement and commercial programs at TRSS. “These are globally-connected enterprises like a cartel.”



TRSS's Derek Benner describes how sex traffickers can operate across borders 'like a cartel.'



As part of TRSS's efforts to identify possible shell companies used by sex traffickers, it found the majority were incorporated at the provincial level.

The company's data scientists also ran their list of Canadian businesses through the International Consortium of Investigative Journalists Offshore Leaks Database. That data bank includes more than 810,000 offshore entities named in five separate investigations, the best known of which is the Panama Papers.

Out of the 700 Canadian companies identified by the TRSS investigation, there were nine matches, showing the international scope of some of the operations and the lucrative nature of transnational crime.

"Victims are moved around the country and across borders on a regular basis," explained Mr. Benner, who previously worked as an executive associate director for Homeland Security Investigations, which is responsible for rooting out transnational and terrorist criminal organizations. "That's a known phenomenon within sex trafficking in particular, especially around big events, big sporting events, big conventions or just as a matter of business."

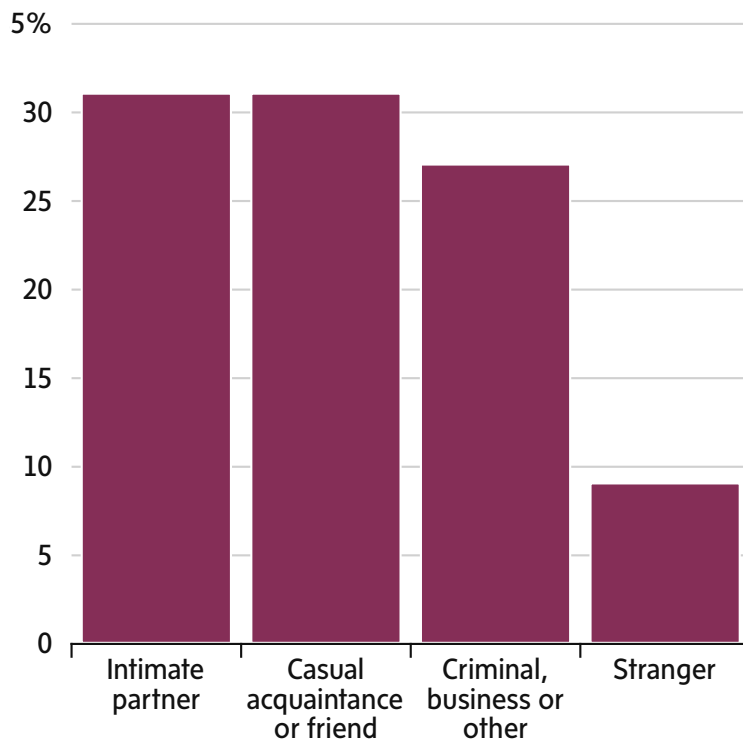
TRSS commenced its Canadian investigation after spending more than five years working with U.S. police to identify and shut down illicit massage parlours in the United States. While doing so, it found that most of those U.S. establishments are part of organized crime networks that include at least one other illicit massage business.

Victims are generally rotated between the businesses every two to six weeks, which also helps traffickers avoid detection by law enforcement. Their traffickers are usually people they know – such as relatives, partners or friends – who use a mix of fraud and coercion to maintain control.

According to Ms. Fischer, many of the women – especially those from China and Korea – don’t speak English, which further complicates their ability to escape the situation. “They were promised a legitimate job here in the U.S. or Canada. And somebody came and picked them up from Flushing, New York, and brought them across the border or brought them to Anytown, USA or Anytown, Canada, to be exploited.”

### Relationship of human-trafficking victims to their traffickers, Canada 2010-2020

Per cent



THE GLOBE AND MAIL, SOURCE: STATISTICS CANADA, CANADIAN CENTRE FOR JUSTICE AND COMMUNITY SAFETY STATISTICS, UNIFORM CRIME REPORTING SURVEY.

DATA | SHARE

Sex traffickers, much like other criminals, often engage in money laundering to misrepresent the source of their funds, which also snarls efforts to detect their illicit activity.

One common technique involves the misuse of Canadian shell corporations to create a false appearance that criminal proceeds were derived from legitimate business sources. A shell corporation is a business that exists

purely on paper because it lacks operations. Although shell companies can be established for valid purposes, such as to serve as takeover vehicles or to raise financing, these corporate entities are also a favourite tool of money launderers because they are vulnerable to abuse.

That's because shell corporations are easy to set up, including from outside of Canada. Empty shells can be used to temporarily park funds and to gain access to the financial system – allowing illicit profits to eventually flow out of the country, including via wire transfers and other banking transactions.

In addition to the lack of public information about who ultimately owns and controls these private corporations, criminals are able to further evade capture by concocting elaborate ownership structures that span different countries and use nominee directors, according to [a separate report published by Transparency International Canada](#), a non-governmental anti-corruption organization.

“The more you layer, the more difficult it can become to trace back the source of the funds,” explains Vanessa Iafolla, principal at Anti-Fraud Intelligence Consulting who focuses on money laundering and human

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Different types of corporate entities can be used as shells. Limited partnerships, for instance, are a type of business structure that is especially appealing to financial criminals because they can be used to open bank accounts, facilitate business transactions, are subject to fewer financial reporting requirements, and may not necessarily pay Canadian taxes, the Transparency International report said.

Canada has been under pressure for years from key allies, including the United States, to crack down on financial crime.

As a result, Ottawa plans to create a publicly-accessible corporate beneficial

ownership registry to reveal who owns and controls millions of private companies.

But critics say there's a key weakness because the provinces have not agreed to participate in that project. The database, which is scheduled to be operational later this year, will only include federally-incorporated companies, even though the vast majority of companies are incorporated in the provinces.

“It's no secret to criminals that Canada has so many loopholes to exploit,” said James Cohen, Executive Director of Transparency International Canada. “Whether it's for human trafficking directly in Canada, or to pass the funds of human trafficking elsewhere through Canada, we are a convenient place to do it.”

The absence of readily-available beneficial ownership information for provincial shell corporations will continue to frustrate efforts to combat sex trafficking.

“That is why it is so important that the provinces get behind this and work with the federal government,” added Mr. Cohen.

Transparency International and Publish What You Pay Canada are among the organizations urging provinces to reach an agreement with Ottawa, arguing also that the registry should be free to use and that ownership information must be subject to verification.

For its part, TRSS found that proceeds from illicit massage businesses often make their way back to the criminals' home countries, such as China, including by way of trade-based money laundering.

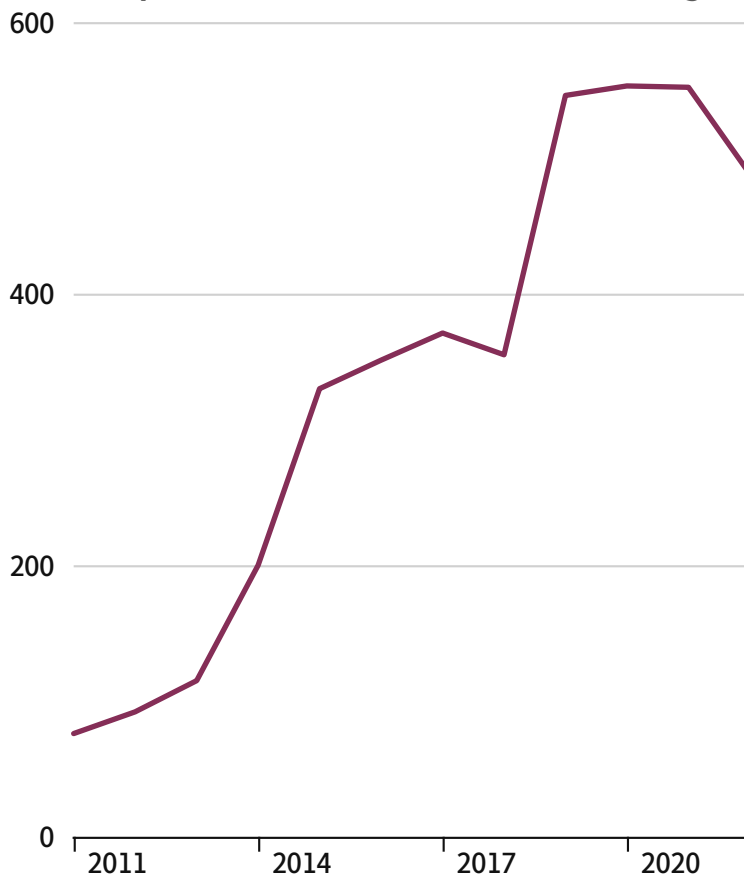
That method, which involves falsified shipping documents, fake invoices and mislabelled goods, uses international trade as a cover to clean dirty money and move those funds across borders.

Other techniques employed by criminals include bulk cash smuggling across international borders and illicit money transfers that bypass the banking system entirely. Similar to a “hawala” or an informal IOU system, money value is transferred from business to business in China’s underground economy with no movement of funds through financial institutions, Mr. Benner said.

“They’re getting more complicated and sophisticated,” he added. “Those same methodologies that we’re familiar with in money laundering for narcotics and other crimes are used extensively by criminal organizations engaged in human trafficking and exploitation.”

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### Police-reported incidents of human trafficking, Canada



THE GLOBE AND MAIL, SOURCE: STATISTICS CANADA. NOTE: 2022 FIGURE IS AN ESTIMATE.

DATA | SHARE

The Canadian government does not have a reliable estimate for the prevalence of human trafficking, partly because it is difficult to detect and victims are scared to ask for help. But research does indicate that sexual exploitation (rather than forced labour) is the most common form of human trafficking.

Existing police-reported data gathered by Statistics Canada shows a sharp increase in incidents of human trafficking over the past 10 years, but they also indicate the COVID-19 pandemic has caused a levelling off since 2020.

The federal agency estimates there were 488 police-reported incidents of human trafficking in 2022. Although the final count for last year will be released later this year, that preliminary figure compares to 552 incidents in 2021 and 553 in 2020. (Of course, since this type of crime is under-reported, this is most likely just a fraction of the total number.)

“With people isolating and spending more time at home, away from public view, the police’s ability to detect this type of crime could have been impacted,” Statscan wrote in a report published this past December.

Criminals may have also switched tactics during the pandemic.

“If you think about the massage parlours, obviously that was disrupted during COVID. If you look at the sexual exploitation over the internet, that definitely increased,” said Sarah Paquet, director and chief executive officer of the Financial Transactions and Reports Analysis Centre of Canada (FinTRAC).

During the economic lockdowns, traffickers shifted to online platforms to connect with and groom potential victims. They also posted explicit videos to advertise to customers, according to FinTRAC.

Sarah Paquet at FinTRAC says human traffickers adapted to digital platforms during the pandemic, but there are red flags that banks and many other businesses can use to help track criminals' activities.

ASHLEY FRASER/THE GLOBE AND MAIL

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Although sex trafficking has long been narrowly viewed as a law enforcement issue, it's much bigger than that. In fact, the perils of this crime also create risks for industries including banking, technology, telecommunications, airlines, trucking, hospitality and health care – and all have a role in solving the problem.

“Trafficking is a crime that we define as hidden in plain sight,” explains Mr. Benner.

As for illicit massage parlours, they are common enough in Canada that

FinTRAC flagged the issue in an updated operational alert in 2021. In it, FinTRAC noted 58 indicators for sexual trafficking to help reporting entities, such as banks, spot patterns of criminal activity. For instance, a string of financial transactions for short stays in hotels and motels in multiple cities over a relatively short period of time is one such red flag.

“You will see it in spas, for example, or small hotels or short-term rentals,” Ms. Paquet said.

“We are really looking into criminal organizations. So, if you talk about criminal organizations, they’re not just doing human trafficking. They will do drug trafficking, they will do fraud. So, all those crimes get intertwined,” she added.

Although these criminals often operate with impunity, there has been some movement to tackle this problem in Canada in recent years.

Since tracing illicit money trails is fundamental to stopping traffickers and rescuing survivors, FinTRAC, the federal anti-money laundering watchdog, launched Project Protect in 2016.

Project Protect is the first-ever public-private partnership – between FinTRAC, financial institutions and law enforcement agencies – to combat human trafficking for sexual exploitation. The collaboration involves the sharing of general information about potential red flags for criminal activity.

FinTRAC received thousands of suspicious transaction reports related to Project Protect in 2021-22 alone.

But as the TRSS investigation of the 700 illicit massage parlours demonstrates, police are often unaware of human trafficking in their communities.

Experts say Canada needs additional tools to track down these criminals.



Exposing the owners of shell corporations, they say, is a necessary step to trace illicit funds, prosecute traffickers and save lives.

“That’s why beneficial ownership [information] is so important to us,” Ms. Paquet said.

## Who to call to report sex trafficking in Canada

- If you spot someone in danger, call 911 or your local police.
- If you are a survivor of human trafficking, or suspect that someone else might need assistance, call the Canadian Human Trafficking Hotline at 1-833-900-1010. It operates 24 hours a day, seven days a week.
- Members of the public can anonymously report a case of human trafficking to the Crime Stoppers Association National Tipline at 1-800-222-TIPS(8477).
- Canadians can also disclose their suspicions about money laundering to FinTRAC on its online portal.
- Consult the Victim Services Directory to locate resources available to survivors across Canada.

[\(Return to top\)](#)

## More reading

[How Canada’s sex traffickers evade capture and isolate victims](#)

[Escaping sex trafficking often takes years, new research shows](#)

[Opinion: Canada’s fight against money laundering hampered by banks’ inability to share information](#)

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**APPENDIX 4**

**INTER-JURISDICTIONAL PRACTICE COMPETENCIES  
AND PERFORMANCE INDICATORS FOR MASSAGE THERAPISTS  
AT ENTRY-TO-PRACTICE – SEPTEMBER 2016**

# **Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice**

**September 2016**



**Federation of Massage Therapy  
Regulatory Authorities of Canada**

College of Massage Therapists of British Columbia  
College of Massage Therapists of New Brunswick  
College of Massage Therapists of Newfoundland and Labrador  
College of Massage Therapists of Ontario

## Table of Contents

Preface .....	3
Conceptual Framework.....	4
Practice Competencies.....	4
Learning Domains and Levels of Complexity .....	6
Assessment Vehicles and Performance Indicators .....	7
Suggested Criteria for Successful Completion of Performance Indicators within an Education Program.....	9
Structural Framework for the Practice Competencies and Performance Indicators .....	10
Statement on Foundational Knowledge .....	11
Practice Competencies and Performance Indicators.....	12
Appendix.....	25

### Preface

The Inter-Jurisdictional Practice Competencies and Performance Indicators for Massage Therapists at Entry-to-Practice (PCs/PIs) were first published by FOMTRAC in 2012, with the intention of promoting common inter-jurisdictional standards for pre-registration education and assessment.

The development of this update began in September 2014, in part to ensure currency and in part to respond to feedback and requests for clarification. A project team of subject matter experts from the regulated jurisdictions was formed, led by a consultant in outcome-based professional standards<sup>1</sup>. In Phase 1 of the project, the team addressed the practice competencies (PCs). They reviewed the existing PCs, refined and clarified them, and undertook a validation survey with RMTs in the regulated jurisdictions. They also reviewed the proposed updated PCs with the stakeholders who had previously provided feedback. In Phase 2 the team developed updated performance indicators (PIs), and undertook a PI feasibility survey with massage therapy education programs in the regulated jurisdictions.

This document lists the team's recommended updated PCs/PIs.

Additional information about the PCs/PIs is available on the resources page of FOMTRAC's website, <http://www.fomtrac.ca/>.

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<sup>1</sup> Dr. David Cane, Catalysis Consulting; [www.catalysisconsulting.net](http://www.catalysisconsulting.net)

## Conceptual Framework

### Practice Competencies

We define a Practice Competency as follows:

***A Practice Competency is the ability to perform a practice task with a specified level of proficiency.***

At entry-to-practice, Entry-Level Proficiency is required. This has the following characteristics:

#### ***Entry-Level Proficiency***

- *When presented with routine situations, the entry-level massage therapist applies relevant competencies in a manner consistent with generally accepted standards in the profession, without supervision or direction, and within a reasonable timeframe. The massage therapist selects and applies competencies in an informed manner. The massage therapist anticipates what outcomes to expect in a given situation, and responds appropriately.*
- *The entry-level massage therapist recognizes unusual, difficult to resolve and complex situations which may be beyond their individual ability. The massage therapist takes appropriate and ethical steps to address these situations, which may include seeking consultation, supervision or mentorship, reviewing research literature, or making a referral.*

## Inter-Jurisdictional Practice Competencies and Performance Indicators

The Practice Competencies listed in this document are the minimum expectations for newly-registered massage therapists who are entering practice for the first time, and are intended to ensure the ability to perform entry-level practice in a manner that is safe, effective and ethical. The PCs should be viewed as an integrated set of abilities that the massage therapist brings to the workplace, and draws upon as necessary, dependent upon the practice context. Each competency qualifies and informs the others. Some competencies will not be applicable in certain practice settings.

Following entry-to-practice, a massage therapist's competencies will continue to evolve based upon increasing experience, ongoing learning from colleagues, and professional development activities. Levels of proficiency in frequently-used competencies may be expected to increase; new competencies may be learned; levels of proficiency in competencies that are not regularly used may decrease. In general, over the span of a career, the massage therapist will move beyond entry-level (novice) practice towards more mature practice levels. The chart below represents this development over time:

### Development of abilities over career span





## Learning Domains and Levels of Complexity

The performance of a Practice Competency requires application of a combination of knowledge, skills, and attitudes.

As a guide to curriculum development for entry-level massage therapy education, and to aid in the assessment of learning, we have identified the domains of learning and levels of complexity that lie behind each Practice Competency, using a modified version of Bloom’s taxonomy<sup>2</sup>. The domain / complexity matrix is shown in the table below.

Domain	Complexity <sup>3</sup>	Descriptor
<b>Cognitive</b> (knowledge and thinking skills)		
	Level 0	Domain not applicable
	Level 1	Remember information
	Level 2	Comprehend & apply information
	Level 3	Analyze and interpret information
	Level 4	Synthesize (create new) information
<b>Psychomotor</b> (physical activity that requires neuromuscular coordination)		
	Level 0	Domain not applicable
	Level 1	Perform simple patterns and tasks
	Level 2	Perform complex patterns and tasks; make minor adjustments based upon outcome
	Level 3	Adapt tasks to new situations
	Level 4	Develop new tasks
<b>Affective</b> (beliefs and values that influence cognitive and psychomotor applications)		
	Level 0	Domain not applicable
	Level 1	Recognize, and respond within, a required system of beliefs and values
	Level 2	Choose (prefer) to function within a particular system of beliefs and values
	Level 3	Internalize a system of beliefs and values and instinctively function within it

<sup>2</sup> The domains and levels are derived from the classic work of Bloom (1956), and others, but are unique to this document.

<sup>3</sup> At entry-to-practice, functioning at the most complex level in each domain is not expected.

### Assessment Vehicles and Performance Indicators

Massage therapy regulators rely upon two mechanisms to assess competencies and qualify candidates for registration:

1. Successful completion of a recognized education program
2. Success in the registration examination

### Assessment Vehicles

Education programs typically consist of three distinct learning and assessment environments, which we describe as academic, simulated and clinical (see below for further descriptions). Each of these environments involves a unique Assessment Vehicle. The registration examination provides two additional Assessment Vehicles: multiple choice questions (MC) and practical (PR), sometimes described as performance-based assessment (PBA) or objective, structured clinical evaluation (OSCE).

Each of the five Assessment Vehicles carries with it specific advantages and challenges relative to the validity and reliability with which it measures a candidate's possession of a Practice Competency. But in no instance do any of the Assessment Vehicles directly measure performance of the Practice Competency itself (that is, as a task performed in independent massage therapy practice). At best, the behaviour observed in an Assessment Vehicle provides an *indication* of the possession of a Practice Competency. Furthermore, because of its methodology, each Assessment Vehicle provides access to potentially unique candidate behaviour.

### Performance Indicators

We use the term Performance Indicator to describe candidate behaviour(s) which can be observed within an Assessment Vehicle:

***A Performance Indicator is a candidate behaviour that can be observed within a specific assessment vehicle, and which provides an indication that a candidate possesses a Practice Competency.***

For each Practice Competency we have identified Performance Indicators applicable to one or more of the five assessment vehicles described above. The Indicators are intended to describe realistic behavioural expectations that relate to the possession of the competency, taking into account the constraints of each assessment vehicle.

Collectively, the Performance Indicators for education programs provide a blueprint for the minimum student learning outcomes a program should deliver to meet the expectations of the regulator. Programs are advised to use the indicators, together with the Practice Competencies, the Entry-Level Proficiency definition, and the domains of learning and levels of complexity to structure their curricula.

Collectively, the Performance Indicators for the registration examination provide a framework for the examination blueprint and a guide for examination developers (who similarly are advised to use the full spectrum of information in this document to help in their work).

### Suggested Criteria for Successful Completion of Performance Indicators within an Education Program

As mentioned above, entry-level massage therapy education programs should involve learning and assessment in three environments:

- The **academic environment**, where learning takes place in a classroom or through guided independent study, and students develop knowledge and thinking skills, and beliefs and values, which enable them to perform the required Performance Indicators. The academic assessment vehicle should be a written and / or oral evaluation designed to identify behaviours consistent with the designated Performance Indicators, within the context of the definition of Entry-Level Proficiency.
- The **simulated environment**, where students learn practical, communication and relationship skills which enable them to perform the required Performance Indicators, under the direction of an experienced professional, in a setting that simulates practice. The simulated assessment vehicle should ensure repeated and reliable demonstration of behaviours consistent with the designated Performance Indicators, within the context of the definition of Entry-Level Proficiency.
- The **clinical environment**, where students work directly with a patient / client<sup>4</sup> in a setting designed to provide patient / client care. Students should be supervised throughout their clinical education, in a manner that facilitates development of independent clinical abilities while ensuring that care provided is safe, effective and ethical. The clinical assessment vehicle should ensure repeated and reliable demonstration of behaviours consistent with the designated Performance Indicators, within the context of the definition of Entry-Level Proficiency, and with a variety of patients / clients.

Learning activities in education programs should be structured to move sequentially through progressively more complex academic, simulated and clinical learning / assessment environments. For example massage skills, which in the final instance may be designated for clinical assessment, should have been introduced first in an academic environment, and later, where feasible, in simulation.

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<sup>4</sup> Throughout this document we use the term *patient / client* to refer to the individual who is a recipient of massage therapy services. This terminology is used to acknowledge the differences in the terms used in legislation and policy in the regulated jurisdictions across the country.

### Structural Framework for the Practice Competencies and Performance Indicators

The Practice Competencies have been grouped under the following functional areas of practice:

1. Professional Practice
  - 1.1 Communication
  - 1.2 Professionalism
  - 1.3 Therapeutic Relationship
2. Assessment
3. Treatment
  - 3.1 Treatment Principles
  - 3.2 Massage Techniques
  - 3.3 Therapeutic Exercise
  - 3.4 Thermal Applications

Learning domains and levels of complexity are shown to the right of each Practice Competency.

Performance Indicators are listed beneath the Practice Competency from which they are derived, with columns to the right showing their designated assessment vehicles.

### Statement on Foundational Knowledge

Massage therapy relies heavily on application of principles of the physical, biological, health, social and behavioural sciences.

Massage therapists require a strong foundational knowledge base common to all licensed health care professionals in Canada, and a more specialized foundational knowledge base related to the structure, function and inter-relationships of the body systems and their response to manipulation.

The Practice Competencies and Performance Indicators are primarily outcome-based and do not refer significantly to education curriculum content such as foundational knowledge requirements. Entry-level massage therapy education programs are expected to provide a foundational knowledge curriculum of sufficient breadth and depth to enable their graduates to perform the Practice Competencies with entry-level proficiency.

## Inter-Jurisdictional Practice Competencies and Performance Indicators

	Practice Competencies	Domain & Level			Indicator #	Performance Indicators	Assessment Vehicle					
		Cognitive	Psychomotor	Affective			Reg Exam MC	Reg Exam PR	Ed Academic	Ed Simulated	Ed Clinical	
<b>1. Professional Practice</b>												
<b>1.1</b>	<b>Communication</b>											
<b>a</b>	<b>Utilize written communication effectively.</b>	2	1	0								
					1	Document information accurately.		x	x	x	x	
					2	Ensure legibility of information.		x	x	x	x	
					3	Employ clear, concise and profession-specific language.		x	x	x	x	
					4	Write in a manner that corresponds to the needs of the reader.			x			x
					5	Employ appropriate formatting, grammar and spelling.			x			
					6	Comprehend written information.	x		x			
<b>b</b>	<b>Utilize oral communication effectively.</b>	2	1	1								
					1	Employ clear, concise and profession-specific language.		x	x	x	x	
					2	Speak in a manner that corresponds to the needs of the listener.		x		x	x	
					3	Employ appropriate pace, tone and projection of voice.		x		x	x	
					4	Employ effective questioning techniques.		x		x	x	
					5	Comprehend oral communication.		x		x	x	
<b>c</b>	<b>Utilize electronic communication effectively.</b>	2	1	0								
					1	Demonstrate a working knowledge of current communication technologies.			x	x		
					2	Select appropriate communication method for recipient.			x	x		
					3	Demonstrate knowledge of measures to secure electronic communication.	x		x			
					4	Demonstrate knowledge of professional use of social media.			x			
<b>d</b>	<b>Communicate in a manner that respects diversity.</b>	2	0	2								
					1	Employ communication approaches that respect diversity.			x	x	x	
					2	Identify resources that support knowledge of diversity.			x			
<b>e</b>	<b>Communicate in a manner that is suitable to the recipient's level of understanding.</b>	2	0	2								
					1	Adapt communication skills to recipient.			x	x		
					2	Confirm that recipient understands communication.			x	x		
<b>f</b>	<b>Utilize active listening skills.</b>	2	1	1								
					1	Demonstrate knowledge of the use and characteristics of active listening.	x		x			
					2	Demonstrate active listening.		x		x	x	
<b>g</b>	<b>Utilize and respond to non-verbal communication.</b>	2	2	1								
					1	Demonstrate knowledge of the characteristics of non-verbal communication.	x		x			
					2	Respond professionally to non-verbal communication.		x	x	x		
					3	Demonstrate appropriate non-verbal communication.		x	x	x	x	
<b>h</b>	<b>Utilize medical terminology.</b>	1	0	0								
					1	Use medical terminology appropriately.		x	x	x	x	
					2	Convey medical concepts using plain language.		x	x	x	x	
					3	Use common medical abbreviations in written communications and clinical records.		x	x	x	x	
<b>i</b>	<b>Contribute to an effective, collaborative atmosphere in group settings.</b>	2	2	2								

## Inter-Jurisdictional Practice Competencies and Performance Indicators

	Practice Competencies	Domain & Level			Indicator #	Performance Indicators	Assessment Vehicle				
		Cognitive	Psychomotor	Affective			Reg Exam MC	Reg Exam PR	Ed Academic	Ed Simulated	Ed Clinical
					1	Demonstrate knowledge of group process.			x		
					2	Interact respectfully with other group members.			x	x	x
<b>j</b>	<b>Identify and address interpersonal conflict.</b>	3	0	2							
					1	Demonstrate knowledge of factors that may create interpersonal conflict.			x		
					2	Demonstrate knowledge of strategies to address interpersonal conflict.			x		
					3	Utilize strategies that address interpersonal conflict.				x	
<b>1.2</b>	<b>Professionalism</b>										
<b>a</b>	<b>Comply with federal and provincial requirements.</b>	2	0	0							
					1	Demonstrate knowledge of relevant provincial requirements.			x		
					2	Demonstrate knowledge of relevant federal requirements.	x		x		
					3	Practice in compliance with federal and provincial requirements.		x		x	x
<b>b</b>	<b>Comply with regulatory requirements.</b>	2	0	0							
					1	Demonstrate knowledge of the mandate and roles of a regulatory body.	x		x		
					2	Demonstrate knowledge of the obligations of a registrant.	x		x		
					3	Differentiate between the role of a regulatory body and that of a professional association.	x		x		
					4	Practice in accordance with regulatory requirements.		x		x	x
<b>c</b>	<b>Comply with municipal and local requirements.</b>	2	0	0							
					1	Identify municipal and local requirements that may affect business practice.			x		
<b>d</b>	<b>Maintain comprehensive practice records.</b>	2	0	0							
					1	Demonstrate knowledge of aspects of professional practice that require documentation.	x		x		
					2	Demonstrate knowledge of security, confidentiality and access requirements for records.	x		x		x
					3	Record required information in a consistent and timely manner.				x	x
<b>e</b>	<b>Maintain professional boundaries.</b>	3	1	2							
					1	Demonstrate knowledge of the purpose of maintaining boundaries.	x		x		
					2	Demonstrate knowledge of ways to establish and maintain boundaries.	x		x	x	
					3	Demonstrate knowledge of commonly occurring boundary violations.	x		x	x	
					4	Interact professionally with others.		x		x	x
<b>f</b>	<b>Maintain a safe and comfortable practice environment.</b>	2	1	2							
					1	Demonstrate knowledge of aspects of physical setting that affect patient / client safety and comfort.	x		x		
					2	Ensure a safe and comfortable environment, consistent with patient / client needs.				x	x
<b>g</b>	<b>Apply standard hygiene and infection control precautions.</b>	2	1	1							
					1	Demonstrate knowledge of standard hygiene practices.	x		x		
					2	Demonstrate knowledge of standard precautions of infection control.	x		x		
					3	Apply standard hygiene practices.		x		x	x
					4	Apply standard precautions for infection control.		x		x	x
<b>h</b>	<b>Practice professionally, regardless of personal beliefs.</b>	2	0	2							
					1	Identify the types of personal belief that may conflict with professional practice.			x		



## Inter-Jurisdictional Practice Competencies and Performance Indicators

	Practice Competencies	Domain & Level				Performance Indicators	Assessment Vehicle				
		Cognitive	Psychomotor	Affective	Indicator #		Reg Exam MC	Reg Exam PR	Ed Academic	Ed Simulated	Ed Clinical
					2	Develop strategies to ensure professional practice is independent of conflicting personal beliefs.			x		
					3	Maintain professional decorum.		x		x	x
i	Apply biomechanical and postural skills for therapist self-protection.	2	2	1							
					1	Demonstrate knowledge of common biomechanical and postural risks for massage therapists.			x		
					2	Apply biomechanical and postural skills that preserve therapist health.				x	x
j	Employ personal care and lifestyle strategies that enhance professional effectiveness.	2	1	2							
					1	Identify lifestyle factors that may influence effectiveness.			x		
					2	Identify self-care strategies to enhance effectiveness.			x		
k	Manage personal stress.	2	2	2							
					1	Identify potential stressors.			x		
					2	Identify stress management strategies.			x		
l	Maintain personal hygiene and professional appearance.	1	1	2							
					1	Relate appearance and personal hygiene to professional impression.			x		
					2	Maintain grooming, dress and hygiene appropriate to professional setting.		x		x	x
m	Identify and address conflict of interest.	2	0	0							
					1	Demonstrate knowledge of situations that create potential for conflict of interest.	x		x		
					2	Demonstrate knowledge of strategies to avoid or resolve conflict of interest.	x		x		
n	Employ critical thinking.	3	0	2							
					1	Define issues clearly.			x	x	x
					2	Identify all relevant information.			x	x	x
					3	Determine course of action.			x	x	x
					4	Defend rationale.			x	x	x
o	Apply ethical considerations in decision making.	3	0	2							
					1	Demonstrate knowledge of characteristics consistent with ethical behaviour.	x		x		
					2	Demonstrate knowledge of ethically challenging situations commonly encountered in massage therapy practice.	x		x		
					3	Utilize strategies that address ethical challenges.	x		x	x	
p	Manage professional time effectively.	2	0	0							
					1	Identify factors that impact time management.			x		
					2	Utilize strategies to address time management challenges.			x	x	x
q	Recognize the role of massage therapy within health care.	2	0	0							
					1	Demonstrate knowledge of the health care delivery framework in Canada.			x		
					2	Demonstrate knowledge of the significance of massage therapy as a regulated health care profession.			x		
r	Establish and maintain professional collaboration.	2	0	2							
					1	Distinguish intra- and inter-professional collaboration.			x		

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					2	Identify the scopes of practice and treatment modalities of health care providers commonly encountered in massage therapy practice.			x		
					3	Demonstrate knowledge of the value of inter-professional collaboration.	x		x		
					4	Identify patient / client conditions that benefit from collaboration with other health care professionals.			x		
s	Utilize research and professional literature.	3	0	0							
					1	Identify reliable sources of research and professional literature.			x		
					2	Access research and professional literature.			x		
					3	Identify evidence relevant to a practice issue.			x		
					4	Evaluate evidence.			x		
					5	Integrate evidence into practice.				x	
t	Maintain currency with developments in the profession.	2	0	0							
					1	Identify sources of information related to professional practice.			x		
					2	Explain the importance of maintaining currency in professional practice.			x		
u	Practice within therapist's knowledge and skill level.	2	0	2							
					1	Articulate an understanding of personal limits of knowledge and abilities.			x		
v	Utilize self reflection to identify personal strengths and areas for improvement.	3	0	2							
					1	Identify multiple sources of feedback related to performance.			x		
					2	Employ self-reflection.			x	x	x
					3	Identify and implement opportunities for improvement.				x	x
w	Perform basic information management functions electronically.	2	1	0							
					1	Create documents electronically.			x		
					2	Access information electronically.			x	x	
x	Ensure sound practice management.	2	0	1							
					1	Demonstrate knowledge of basic principles of financial management.			x		
					2	Demonstrate knowledge of basic principles of business management.			x		
					3	Demonstrate knowledge of billing procedures.			x		
y	Prepare reports for third parties.	3	0	0							
					1	Describe the nature, content and legal implications of reports.			x		
					2	Develop reports with appropriate content.			x		
<b>1.3</b>	<b>Therapeutic Relationship</b>										
a	Display positive regard toward patient / client.	2	0	2							
					1	Demonstrate respect for patient / client.		x		x	x
					2	Establish rapport with patient / client.		x		x	x
					3	Respond with empathy.		x		x	x
b	Practice patient / client centred care.	3	0	2							
					1	Demonstrate knowledge of patient / client centred care.	x		x		

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					2	Employ a patient / client centred approach to care.		X	X	X	X
<b>c</b>	<b>Maintain informed patient / client consent throughout assessment and treatment.</b>	2	0	2							
					1	Demonstrate knowledge of the purpose of informed consent.	X		X		
					2	Obtain informed consent prior to performing assessment, treatment and reassessment.		X		X	X
<b>d</b>	<b>Obtain explicit consent prior to assessment and treatment of sensitive body areas.</b>	2	0	2							
					1	Demonstrate knowledge of potential sensitive areas.	X		X		
					2	Identify the patient's / client's sensitive areas.		X		X	
					3	Confirm patient / client has a stop signal.		X		X	
					4	Demonstrate knowledge of the potential for touch-triggered responses.	X				
<b>e</b>	<b>Respect patient's / client's physical privacy.</b>	2	1	2							
					1	Demonstrate knowledge of privacy considerations in the practice environment.	X		X	X	X
					2	Respond to patient's / client's individual privacy needs.		X		X	X
					3	Direct patient / client in degree of disrobing.		X		X	X
<b>f</b>	<b>Recognize and address the power differential in the patient- / client-therapist relationship.</b>	3	0	2							
					1	Demonstrate knowledge of the characteristics and implications of power differentials.	X		X		
					2	Explain therapist responsibility for managing the power differential between patient / client and therapist.	X		X		
					3	Describe strategies to manage problems arising from power differentials.			X		
					4	Demonstrate knowledge of sexual abuse prevention.	X		X		
<b>g</b>	<b>Recognize and address transference and counter-transference.</b>	3	0	2							
					1	Demonstrate knowledge of the characteristics and implications of transference and countertransference.	X		X		
					2	Describe strategies to manage problems arising from transference and countertransference.			X		
<b>h</b>	<b>Employ touch with therapeutic intent.</b>	2	2	2							
					1	Demonstrate knowledge of appropriate touch.	X		X		
					2	Restrict touch within treatment to therapeutic contact.		X		X	X
<b>i</b>	<b>Address accidental or incidental physical contact.</b>	2	1	2							
					1	Demonstrate knowledge of circumstances that may result in perceived inappropriate contact.	X		X		
					2	Employ approaches to avoid accidental or incidental contact.		X		X	
					3	Demonstrate knowledge of ways to address perceived inappropriate contact.	X		X		
<b>j</b>	<b>Assist patient / client in representing their needs to others.</b>	2	0	2							
					1	Describe commonly-occurring circumstances requiring the massage therapist to advocate on the patient's / client's behalf.			X		
<b>2. Assessment</b>											
<b>a</b>	<b>Obtain comprehensive case history.</b>	3	0	1							
					1	Demonstrate knowledge of the components of a comprehensive case history.	X		X		

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					2	Demonstrate knowledge of ways to obtain a case history.	x		x	x		
					3	Interview patient / client to obtain case history and their desired treatment goals.		x			x	x
<b>b</b>	<b>Integrate findings of other health care practitioners.</b>	3	0	1								
					1	Demonstrate knowledge of the importance of including assessment findings from other health care practitioners.	x			x		
					2	Incorporate assessment findings of other health care practitioners into assessment planning.		x	x	x	x	
<b>c</b>	<b>Apply knowledge of commonly-occurring conditions to assessment.</b>	2	0	0								
					1	Identify indications for assessing patients / clients presenting with conditions listed in the Appendix.	x			x		
					2	Demonstrate knowledge of safety considerations and adaptation of assessments for patients / clients presenting with conditions listed in the Appendix.	x			x		
<b>d</b>	<b>Select and perform assessments incorporating knowledge of patient / client history, safety considerations and evidence.</b>	3	2	1								
					1	Identify assessment needs.	x			x	x	x
					2	Select appropriate assessment procedures.	x			x	x	x
					3	Perform assessment appropriately.		x			x	x
<b>e</b>	<b>Modify assessments based upon emerging findings.</b>	3	2	1								
					1	Relate modifications to findings.	x			x	x	
					2	Adapt assessments based on findings.		x		x	x	x
<b>f</b>	<b>Maintain clinically relevant observation.</b>	2	1	2								
					1	Demonstrate knowledge of the importance of maintaining clinically relevant observation.	x			x		
					2	Demonstrate ongoing clinically relevant observation.		x			x	x
<b>g</b>	<b>Perform vital signs assessment.</b>	2	2	0								
					1	Identify indications for performing vital signs assessment.	x			x		
					2	Describe the process for performing vital signs assessment.				x		
					3	Demonstrate vital signs assessment.		x			x	x
					4	Differentiate between normal and abnormal findings.	x			x		
					5	Demonstrate knowledge of the relationship between findings and patient / client presentation.	x			x		x
<b>h</b>	<b>Assess abilities to perform activities of daily living.</b>	2	2	0								
					1	Demonstrate knowledge of indications for assessing activities of daily living.	x			x		
					2	Assess patient's / client's capacity to perform activities of daily living.					x	
<b>i</b>	<b>Perform postural assessment.</b>	2	2	0								
					1	Identify indications and safety considerations for performing postural assessment.	x			x		
					2	Describe the process for performing a postural assessment.				x		
					3	Demonstrate postural assessment.		x			x	x
					4	Differentiate between normal and abnormal findings.	x			x		
					5	Identify the relationship between findings and patient / client presentation.	x			x		

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<b>j</b>	<b>Perform palpatory assessment.</b>	2	2	0										
					1	Identify indications and safety considerations for performing palpatory assessment.	x		x					
					2	Describe the process for performing a palpatory assessment.			x					
					3	Demonstrate palpatory assessment.		x		x	x	x		
					4	Differentiate between normal and abnormal findings.	x		x					
					5	Identify the relationship between findings and patient / client presentation.	x		x					
<b>k</b>	<b>Perform gait assessment.</b>	2	2	0										
					1	Identify indications and safety considerations for performing gait assessment.	x		x					
					2	Describe the process for performing a gait assessment.			x					
					3	Demonstrate gait assessment.		x		x	x	x		
					4	Differentiate between normal and abnormal findings.	x		x					
					5	Identify the relationship between findings and patient / client presentation.	x		x					
<b>l</b>	<b>Perform range of motion assessment.</b>	2	2	0										
					1	Identify indications and safety considerations for performing range of motion assessment.	x		x					
					2	Describe the process for performing a range of motion assessment.			x					
					3	Demonstrate range of motion assessment.		x		x	x	x		
					4	Differentiate between normal and abnormal findings.	x		x					
					5	Identify the relationship between findings and patient / client presentation.	x		x					
<b>m</b>	<b>Perform muscle length assessment.</b>	2	2	0										
					1	Identify indications and safety considerations for performing muscle length assessment.	x		x					
					2	Describe the process for performing a muscle length assessment.			x					
					3	Demonstrate muscle length assessment.		x		x	x	x		
					4	Differentiate between normal and abnormal findings.	x		x					
					5	Identify the relationship between findings and patient / client presentation.	x		x					
<b>n</b>	<b>Perform muscle strength assessment.</b>	2	2	0										
					1	Identify indications and safety considerations for performing muscle strength assessment.	x		x					
					2	Describe the process for performing a muscle strength assessment.			x					
					3	Demonstrate muscle strength assessment.		x		x	x	x		
					4	Differentiate between normal and abnormal findings.	x		x					
					5	Identify the relationship between findings and patient / client presentation.	x		x					
<b>o</b>	<b>Perform joint play assessment.</b>	2	2	0										
					1	Identify indications and safety considerations for performing joint play assessment.	x		x					
					2	Describe the process for performing a joint play assessment.			x					
					3	Demonstrate joint play assessment.		x		x	x	x		
					4	Differentiate between normal and abnormal findings.	x		x					
					5	Identify the relationship between findings and patient / client presentation.	x		x					
<b>p</b>	<b>Perform neurological assessment.</b>	2	2	0										
					1	Identify indications and safety considerations for performing neurological assessment.	x		x					
					2	Describe the process for performing a neurological assessment.			x					

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					3	Demonstrate neurological assessment.		X		X	X
					4	Differentiate between normal and abnormal findings.	X		X		
					5	Identify the relationship between findings and patient / client presentation.	X		X		
<b>q</b>	<b>Perform appropriate special tests.</b>	2	2	0							
					1	Identify indications and safety considerations for selecting a specific test.	X		X		
					2	Identify the purpose of the selected test.	X		X		
					3	Describe how the selected test affects the involved tissues.	X		X		
					4	Demonstrate the selected test.		X		X	X
					5	Identify the relationship between findings and patient / client presentation.	X		X		
<b>r</b>	<b>Interpret findings and formulate clinical impression / differential diagnosis.</b>	3	0	1							
					1	Analyze findings.	X		X		
					2	Formulate a clinical impression / differential diagnosis.	X		X		
<b>s</b>	<b>Recognize conditions requiring urgent medical attention and respond accordingly.</b>	3	0	1							
					1	Recognize presentations of common urgent medical conditions.	X		X		
					2	Demonstrate knowledge of appropriate responses to urgent medical events.	X		X		
					3	Demonstrate appropriate responses to urgent medical events.				X	
					4	Demonstrate first aid and cardiopulmonary resuscitation (CPR). <i>(First aid and CPR abilities will normally be demonstrated through external certification.)</i>					
<b>t</b>	<b>Recognize conditions requiring non-urgent medical attention and respond accordingly.</b>	3	0	1							
					1	Demonstrate knowledge of presentations that require non-urgent medical care.	X		X		
					2	Demonstrate knowledge of appropriate responses to non-urgent medical conditions.	X		X		
<b>u</b>	<b>Recognize when patient may benefit from community services.</b>	2	0	1							
					1	Identify services that may be of assistance to patients / clients.				X	
<b>3. Treatment</b>											
<b>3.1 Treatment Principles</b>											
<b>a</b>	<b>Incorporate relevant assessment data, research evidence, and clinical experience into development of a patient / client centred treatment plan.</b>	3	0	2							
					1	Demonstrate knowledge of considerations that guide treatment planning.	X		X		
					2	Formulate individualized treatment plan.			X		
					3	Relate treatment components to patient / client stage of life.			X		
					4	Relate treatment plan to desired outcomes.			X		
<b>b</b>	<b>Select treatment components based on indications and safety considerations.</b>	3	0	2							
					1	Relate treatment components to indications and safety considerations.	X		X		
<b>c</b>	<b>Treat consistent with treatment plan.</b>	3	2	2							

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					1	Demonstrate knowledge of health sciences related to conditions listed in the Appendix.	x		x			
					2	Describe common clinical presentations of patients / clients with conditions listed in the Appendix.	x		x			
					3	Apply treatment modalities and techniques incorporating knowledge of commonly-occurring conditions, as listed in the Appendix.		x		x		
					4	Treat in a manner appropriate to patient / client presentation.		x		x	x	
<b>d</b>	<b>Perform ongoing patient / client evaluation, and adapt treatment plan as needed.</b>	3	2	1								
					1	Explain the importance of ongoing evaluation.			x			
					2	Modify treatment plan based upon findings.			x			
					3	Relate modifications to findings.			x			
<b>e</b>	<b>Utilize patient / client transfer techniques.</b>	2	2	0								
					1	Demonstrate knowledge of principles of safe transfer.	x		x			
					2	Determine what assistance patient / client requires.		x		x		
					3	Employ safe transfer techniques.		x		x		
<b>f</b>	<b>Assist patient / client with dressing and undressing.</b>	2	1	1								
					1	Demonstrate knowledge of circumstances where assistance may be required.	x		x			
					2	Demonstrate knowledge of circumstances where consent for assistance is required.	x		x			
					3	Obtain consent where appropriate.		x		x		
					4	Provide assistance with dressing and undressing where required.		x		x		
<b>g</b>	<b>Employ draping.</b>	2	1	2								
					1	Demonstrate knowledge of the purpose of draping.	x		x			
					2	Drape and undrape patient / client, appropriately for treatment.		x		x	x	
<b>h</b>	<b>Position patient / client.</b>	2	2	0								
					1	Select appropriate positioning.		x		x	x	
					2	Direct and position patient / client.		x		x	x	
					3	Modify position as required.		x		x	x	
<b>i</b>	<b>Adapt treatment based on patient / client response.</b>	3	3	2								
					1	Demonstrate knowledge of patient / client responses that may require adaptation, reassessment or cessation of treatment.	x		x			
					2	Monitor patient / client responses and adapt as necessary.		x		x	x	
<b>j</b>	<b>Guide patient / client in self care.</b>	2	2	2								
					1	Demonstrate knowledge of the value of patient / client self care.	x		x			
					2	Select self care based upon desired outcomes.	x		x			
					3	Instruct patient / client in self care.		x		x	x	
<b>3.2</b>	<b>Massage Techniques</b>											
<b>a</b>	<b>Perform effleurage.</b>	2	2	0								
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of effleurage.	x		x			
					2	Incorporate effleurage into treatment.		x		x	x	

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					3	Modify effleurage based on patient / client history, presentation and response.	x	x	x	x	x
<b>b</b>	<b>Perform stroking.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of stroking.	x		x		
					2	Incorporate stroking into treatment.		x		x	x
					3	Modify stroking based on patient / client history, presentation and response.	x	x	x	x	x
<b>c</b>	<b>Perform petrissage.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of petrissage.	x		x		
					2	Incorporate different types of petrissage into treatment.		x		x	x
					3	Modify petrissage based on patient / client history, presentation and response.	x	x	x	x	x
<b>d</b>	<b>Perform skin rolling.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of skin rolling.	x		x		
					2	Incorporate skin rolling into treatment.		x		x	x
					3	Modify skin rolling based on patient / client history, presentation and response.	x	x	x	x	x
<b>e</b>	<b>Perform vibration.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of vibration.	x		x		
					2	Incorporate different types of vibration into treatment.		x		x	x
					3	Modify vibration based on patient / client history, presentation and response.	x	x	x	x	x
<b>f</b>	<b>Perform percussive techniques.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of percussive techniques.	x		x		
					2	Incorporate different types of percussive techniques into treatment.		x		x	x
					3	Modify percussive techniques based on patient / client history, presentation and response.	x	x	x	x	x
<b>g</b>	<b>Perform rocking and shaking.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of rocking and shaking.	x		x		
					2	Incorporate different types of rocking and shaking into treatment.		x		x	x
					3	Modify rocking and shaking based on patient / client history, presentation and response.	x	x	x	x	x
<b>h</b>	<b>Perform frictioning.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of frictioning.	x		x		
					2	Incorporate different types of frictioning into treatment.		x		x	
					3	Modify frictioning based on patient / client history, presentation and response.	x	x	x	x	
<b>i</b>	<b>Perform muscle stripping.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of muscle stripping.	x		x		
					2	Incorporate different types of muscle stripping into treatment.		x		x	x
					3	Modify muscle stripping based on patient / client history, presentation and response.	x	x	x	x	x



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<b>j</b>	<b>Perform muscle approximation.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of muscle approximation.	x			x				
					2	Incorporate muscle approximation into treatment.		x			x	x		
					3	Modify muscle approximation based on patient / client history, presentation and response.	x	x	x	x	x	x		
<b>k</b>	<b>Perform Golgi tendon organ techniques.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of Golgi tendon organ techniques.	x			x				
					2	Incorporate different types of Golgi tendon organ techniques into treatment.		x			x	x		
					3	Modify Golgi tendon organ techniques based on patient / client history, presentation and response.	x	x	x	x	x	x		
<b>l</b>	<b>Perform lymphatic drainage techniques.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of lymphatic drainage techniques.	x			x				
					2	Incorporate different types of lymphatic drainage techniques into treatment.		x			x			
					3	Modify lymphatic drainage techniques based on patient / client history, presentation and response.	x	x	x	x	x			
<b>m</b>	<b>Perform trigger point techniques.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of trigger point techniques.	x			x				
					2	Incorporate different types of trigger point techniques into a treatment.		x			x	x		
					3	Modify trigger point techniques based on patient history, presentation and response.	x	x	x	x	x	x		
<b>n</b>	<b>Perform fascial / myofascial techniques.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of fascial / myofascial techniques.	x			x				
					2	Incorporate different types of fascial / myofascial techniques into treatment.		x			x	x		
					3	Modify fascial / myofascial techniques based on patient / client history, presentation and response.	x	x	x	x	x	x		
<b>o</b>	<b>Perform joint mobilization techniques.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of joint mobilization techniques.	x			x				
					0	Incorporate different types of joint mobilization into treatment.		x			x	x		
					3	Modify joint mobilization based on patient / client history, presentation and response.	x	x	x	x	x	x		
<b>p</b>	<b>Direct patient / client in diaphragmatic breathing.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of diaphragmatic breathing.	x			x				
					2	Incorporate diaphragmatic breathing into treatment.		x			x	x		
<b>3.3</b>	<b>Therapeutic Exercise</b>													
<b>a</b>	<b>Perform and direct patient / client in stretching.</b>	2	2	0										
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of stretching.	x			x				

## Inter-Jurisdictional Practice Competencies and Performance Indicators

	Practice Competencies	Domain & Level				Performance Indicators	Assessment Vehicle				
		Cognitive	Psychomotor	Affective	Indicator #		Reg Exam MC	Reg Exam PR	Ed Academic	Ed Simulated	Ed Clinical
					2	Direct patient / client in stretching.		x		x	x
					3	Incorporate different types of stretching into treatment.		x		x	x
					4	Modify stretching based on patient / client history, presentation and response.	x	x	x	x	x
<b>b</b>	<b>Perform and direct patient / client in range of motion exercises.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of range of motion exercises.	x		x		
					2	Direct patient / client in range of motion exercises.		x		x	x
					3	Incorporate range of motion exercises into treatment.		x		x	x
					4	Modify range of motion exercises based on patient / client history, presentation and response.	x	x	x	x	x
<b>c</b>	<b>Direct patient / client in strengthening exercises.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of strengthening exercises.	x		x		
					2	Direct patient / client in different types of strengthening exercises.		x		x	x
					3	Modify strengthening exercises based on patient / client history, presentation and response.	x	x	x	x	x
<b>d</b>	<b>Direct patient / client in cardiovascular exercises.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of cardiovascular exercises.	x		x		
					2	Direct patient / client in different types of cardiovascular exercises.		x		x	
					3	Modify cardiovascular exercises based on patient / client history, presentation and response.	x	x	x	x	
<b>e</b>	<b>Direct patient / client in proprioception exercises.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of proprioception exercises.	x		x		
					2	Direct patient / client in different types of proprioception exercises.		x		x	
					3	Modify proprioception exercises based on patient / client history, presentation and response.	x	x	x	x	
<b>f</b>	<b>Direct patient / client in exercises to restore capacity in activities of daily living.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of exercises to restore capacity in activities of daily living.	x		x		
					2	Direct patient / client in different types of exercises to restore capacity in activities of daily living.		x		x	x
					3	Modify exercises to restore capacity in activities of daily living based on patient / client history, presentation and response.	x	x	x	x	x
<b>3.4</b>	<b>Thermal Applications</b>										
<b>a</b>	<b>Perform and direct patient / client in heat applications.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of heat applications.	x		x		
					2	Direct patient / client in heat applications.		x		x	x
					3	Incorporate different types of heat applications into treatment.		x		x	
					4	Incorporate heat applications into treatment.					x

## Inter-Jurisdictional Practice Competencies and Performance Indicators

	Practice Competencies	Domain & Level				Performance Indicators	Assessment Vehicle				
		Cognitive	Psychomotor	Affective	Indicator #		Reg Exam MC	Reg Exam PR	Ed Academic	Ed Simulated	Ed Clinical
					5	Modify heat applications based on patient / client history, presentation and response.	x	x	x	x	x
<b>b</b>	<b>Perform and direct patient / client in cold applications.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of cold applications.	x		x		
					2	Direct patient / client in cold applications.		x		x	
					3	Incorporate different types of cold applications into treatment.		x		x	
					4	Incorporate cold applications into treatment.				x	
					5	Modify cold applications based on patient / client history, presentation and response.	x	x	x	x	
<b>c</b>	<b>Perform and direct patient / client in contrast applications.</b>	2	2	0							
					1	Demonstrate knowledge of indications, safety considerations, effects and outcomes of contrast applications.	x		x		
					2	Direct patient / client in contrast applications.		x		x	
					3	Incorporate different types of contrast applications into treatment.		x		x	
					4	Incorporate contrast applications into treatment.				x	
					5	Modify contrast applications based on patient / client history, presentation and response.	x	x	x	x	

Entry-level Massage Therapists should possess knowledge of the etiology, pathophysiology and clinical manifestations of commonly-occurring conditions and impairments, and apply this knowledge in order to safely and effectively assess and treat patients / clients who present with these conditions and impairments.

Relevant Performance Indicators are associated with Practice Competencies 2.c and 3.1.c

<b>1 Common clinical conditions that present as variables of:</b>
a Stress
b Pain
c Mood
d Anxiety
e Sleep
f Cognition
<b>2 Conditions with multi-factorial considerations:</b>
a Inflammation
b Infection
c Scarring
d Swelling
e Congestion
f Movement restrictions
g Malignancy
h Trauma and abuse
<b>3 Stages of life:</b>
a Pregnancy
b Infancy and childhood
c Adolescence
d Adulthood
e Senior years
f End of life
<b>4 Neurological conditions:</b>
a Conditions of the central nervous system
b Conditions of the peripheral nervous system
c General neurological conditions
<b>5 Orthopedic conditions:</b>
a Conditions of the bone and periosteum
b Conditions of the muscles and tendons
c Conditions of the fascia
d Conditions of the skin and connective tissue
e Conditions of the synovial joints, cartilage, ligaments and bursa
f Systemic myofascial and orthopedic conditions
<b>6 Post-surgical conditions:</b>
a Conditions involving orthopedic interventions
b Conditions involving artificial openings
c Conditions involving implants
<b>7 Systemic conditions:</b>
a Conditions of the cardiovascular system
b Conditions of the digestive system
c Conditions of the endocrine system
d Conditions of the gastrointestinal system
e Conditions of the immune system
f Conditions of the integumentary system
g Conditions of the lymphatic system
h Conditions of the reproductive system
i Conditions of the respiratory system
j Conditions of the urinary system

**APPENDIX 5**

**MODALITIES IN**

**INTER-JURISDICTIONAL PRACTICE COMPETENCIES**

**AND PERFORMANCE INDICATORS**

## **Modalities in Inter-Jurisdictional Practice Competencies and Performance Indicators**

Massage therapists practicing within the province of Alberta will be expected to have knowledge and skills equal to, or greater than those listed within the Inter-Jurisdictional Practice Competencies and Performance Indicators (IJPC-PI). The IJPC-PI document will ensure that regulated members exemplify proper professional practice through appropriate communication skills, professionalism, and understand how to maintain a fitting therapeutic relationship. This includes but is not limited to; informed consent, professional boundaries, maintaining comprehensive professional records, critical thinking, understanding research and literature, practicing client-centered care, the Freedom of Information and Protection of Privacy Act (Alberta) and the Privacy Act (Canada), and client respect. The IJPC-PI document supports standardized client assessments. This includes but is not limited to; obtaining comprehensive case histories, modifying assessments based on emerging findings, maintaining clinically relevant observations, assessing posture, assessing range of motion, assessing muscle function, assessing neurological function, and assessing special tests. Additionally, the IJPC-PI document lists guiding treatment principles along with foundational massage therapy techniques, therapeutic exercises, and thermal application. This includes but is not limited to; development of a client centred treatment plan, safety considerations, ongoing evaluation, draping techniques, and self-care.

The modalities supported by the IJPC-PI document are:

Massage Techniques - Stroking, Petrissage, Skin Rolling, Vibration, Percussive Techniques, Rocking & Shaking, Frictioning, Muscle Stripping, Muscle Approximation, Golgi Tendon Organ Techniques, Lymphatic Drainage, Trigger Point Techniques, Fascial / Myofascial Techniques, Joint Mobilization, Diaphragmatic Breathing

Therapeutic Exercises - Stretching, Range of Motion Exercises, Strengthening Exercises, Cardiovascular Exercises, Proprioception Exercises, Return to Activities of Daily Living

Thermal Applications - Heat Applications (e.g. - Hydrocollator, Hot Pack, Hot Stone Massage), Cold Applications (e.g. - Ice Pack), Contrast Applications (Alternating Hot and Cold Thermal Application)

**APPENDIX 6**  
**MODALITIES OUTSIDE OF SCOPE**

## **MODALITIES OUTSIDE OF SCOPE OF PRACTICE**

Modalities considered outside the scope of practice for massage therapists are those that stray from the treatment of the musculoskeletal system and associated structures (muscles, connective tissues, tendons, ligaments, and joints), techniques with insufficient training or lacking approved training, and insufficient evidence-based research.

Please note, these modalities may still be practiced by Massage Therapists in Alberta, however they may not be included in a Massage Therapy treatment or billed as such as they do not fall within the Massage Therapy Scope of Practice. Further, non-massage therapy services that are not linked to or associated with his or her status as a Registrant, and that there is a clear separation of professional services that fall within and outside the scope of practice of Registrants. These modalities must be practiced and billed as separate treatments.

### **These modalities may include, but are not limited to:**

Energy Work

Aboriginal Healing

Allergy Testing

Aromatherapy

Ayurvedic Medicine

Bach Flower Therapy

Biodynamics

Biofeedback

Endermology

Herbology

Homeopathy

Hypnotherapy

Iridology

Lypossage

Metaphysical Healing

Nutrition Counseling



Ortho Bionomy

Orthotics

Osteopathy

Personal Training

Quantum Zrroid Biofeedback

Raindrop therapy

Reiki

Religious/Spiritual Healing

Sound Therapy

Success Through Alignment Restoration (S.T.A.R.)

### **Restricted Activities Outside of Scope of Practice**

Modalities that are considered restricted activities outside of the scope of practice for massage therapists are those that require separate training, legal authorization and title from that of a registered massage therapist to be performed. Practitioners with a proper applicable education and membership to a regulatory body are able to practice the restricted modalities, but not able to perform them while acting under the title of a registered massage therapist. Practice skills and techniques performed during a massage therapy session must be limited to those encompassed within the scope of practice of a massage therapist.

**These modalities may include, but are not limited to:**

High Velocity Thrust Manipulations

Colon Hydrotherapy

Psychotherapy

Traditional Chinese Medicine (Acupuncture, Tuina)

**APPENDIX 7**  
**MODALITIES REQUIRING ADDITIONAL EDUCATION**

# **Modalities Requiring Additional Education**

## **Guiding Principles for Modalities Requiring Additional Education**

### *Definition of Massage Therapy according to the Application*

Massage Therapy in practice, is the assessment, treatment, and prevention of soft tissue physical dysfunction, injury, and pain. Manipulation, mobilization, electrotherapeutic modalities, and many other forms of therapy are utilized to maintain, rehabilitate, and improve physical function, relieve pain, or promote health.

*The following is a proposed Practice Statement for consideration by the Government of Alberta.*

### *Massage Therapy in Practice*

In their practice, Massage Therapists do one or more of the following:

1. examine, assess, and treat physical dysfunction, injury, and pain through soft tissue manipulation, mobilization, and other methods with the intent to rehabilitate, or to augment physical function, or to maintain health, or to promote health and wellness, and
2. engage in research, education, and administration with respect to health services delivery and the science, techniques, and practice of massage therapy, and
3. provide restricted activities authorized by the regulations.

Massage Therapy is performed with a goal or focus of treating or relaxing the musculoskeletal system and related pathologies to be considered within the scope of practice of a Massage Therapist. The following list of Modalities Not Included in the IJ Docs all fall under the evidence informed category and have been determined to be safe for a Registered Massage Therapist in Alberta to complete with confirmed approved training.

All modalities utilized by members in treatment of their patients, even if they are foundational techniques or modalities requiring additional education, must be defensible and justifiable that they are in the best interest of the patient, the member has sufficient additional education (if applicable), are within the scope of practice of a registered massage therapist and they progress the patient towards the goal of treating current musculoskeletal dysfunctions and pathological conditions. Members are responsible for the quality and validity of the treatments they provide and therefore, should concerns or a complaint arise, members may be asked to justify their use of a modality, their intention and approach to the College by providing proof of evidence of efficiency, alignment with the Massage Therapy Scope of Practice and safety of the modality.

It should be noted that this list encompasses modalities that Registered Massage Therapists may use in practice, however there are a variety of additional techniques which fall under the general scope of massage therapy that expand on the general techniques found in the Interjurisdictional Performance Indicators, which a therapist may study and incorporate into treatments. Due to the fact that this list is ever evolving and growing, the intention of the future college is to allow therapists to utilize advanced techniques which are deemed to be evidence informed, safe for patients and which fall within the general scope of Massage Therapy. All advanced techniques utilized by a Registered Massage Therapist must follow the same standards as the Modalities Requiring Additional Education, being that they must be defensible and justifiable, that they are in the best

interest of the patient, the member has sufficient additional education (if applicable), are within the scope of practice of a Registered Massage Therapist and they progress the patient towards the goal of treating current musculoskeletal dysfunctions and pathological conditions.

An appendix has been provided with articles for reference to support rationale for inclusion of the modalities requiring additional education.

#### *Statement of General Exclusions*

Work performed under the theories, ideologies or intentions to impact energy, energy fields, Qi, meridian systems, etc. or are currently unsubstantiated by sufficient research-based evidence, will not be deemed within scope for massage therapists.

### **Modalities Requiring Additional Education**

#### **Modalities Requiring Additional Education Involving Additional Devices/Tools**

Requires Additional Education - Completion of a College approved course

Rational: Supports the massage therapy scope of practice to make a positive change to the musculoskeletal system of the patient. All practices have safely been used by massage therapists in Alberta and some regulated provinces to increase range of motion and decrease pain for the patient.

Exclusions: Work performed with the intention of damaging tissue, piercing the skin, or working outside patient pain scale, shall be deemed beyond the scope of massage therapists within the province of Alberta and therefore excluded from use within massage therapy settings.

#### Examples of Modalities in this Category:

##### **Myofascial Cupping**

- a. Specific Rationale - Supports the massage therapy scope of practice to make a positive change to the musculoskeletal system of the patient. Many massage therapists in Alberta and most regulated provinces safely and effectively use cupping in practice. Cupping (dry) has been shown to reduce pain when performed properly.
- b. Specific Exclusions - Massage Therapists shall not perform "wet cupping" which pierces the skin and draws blood as this is a Traditional Chinese Medicine modality. Massage Therapists shall not perform fire cupping which utilizes an open flame near the patient to create suction in cups (glass, bamboo, plastic, etc.).
- c. Current Courses -  
<https://www.conedinstitute.com/cupping-therapy>  
<https://www.physiosecrets.com/myofascialcupping>
- d. Current Supporting Research in support of Myofascial Cupping -  
<https://pubmed.ncbi.nlm.nih.gov/30462793/>

##### **Hot Stone**

- a. Specific Rationale - Massage Therapists in Alberta currently safely use Hot Stone therapy to treat a variety of conditions including chronic pain,

fibromyalgia and the musculoskeletal manifestations of stress and depression.

- b. Specific Exclusions - Therapists may not use stone modalities which incorporate the use of energy based methods or with the intent to treat the mental health of a patient.
- c. Current Courses - <http://purelotusmassage.com/courses/stone-therapy-massage/>  
<https://www.musclerelievement.com/hot-stone-massage-course>
- d. Current Supporting Research in support of hot stone therapy:  
[https://ascopubs.org/doi/abs/10.1200/jco.2015.33.29\\_suppl.179](https://ascopubs.org/doi/abs/10.1200/jco.2015.33.29_suppl.179)

**IASTM: Instrument-Assisted Soft Tissue Mobilization: Graston, Blades, or similar**

- a. Specific Rationale - Supports the massage therapy scope of practice to make a positive change to the musculoskeletal system of the patient. Graston and other IASTM practices have safely been used by massage therapists in Alberta and some regulated provinces to increase range of motion and decrease pain for the patient.
- b. Specific Exclusions - Massage Therapists shall not perform Gua Sha therapy which is practiced according to Traditional Chinese Medicine theories and meridian theory.
- c. Current Courses:  
<https://grastontechnique.com/clinicians/>  
<https://www.prohealthsys.com/shop/online-courses/intro-to-iastm-online/>  
<https://www.prohealthsys.com/continuing-education/seminar-schedule/>  
<https://www.rocktape.com/medical/education/fmt-blades/>
- d. Current Research in support of IASTM:  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4932073/>

**Elastic Taping (K-Tape, Kinesiotape, Rocktape, or similar)**

- a. Specific Rationale - Elastic taping supports the scope of practice of Massage therapy by providing a safe and effective addition to standard treatment. Tape is typically applied after the hands on portion of the massage therapy treatment to prolong relief, reduce inflammation, encourage range of motion and relax hypertonic muscles.
- b. Specific Exclusions - None at this time
- c. Current Courses:  
[https://www.orthocanada.com/en/academy-ktape?utm\\_term=&utm\\_campaign=Canada+EN+-+Search+-+OrthoCanada&utm\\_source=adwords&utm\\_medium=ppc&hsa\\_acc=1971735470&hsa\\_cam=136169080&hsa\\_grp=139530010212&hsa\\_ad=586754644292&hsa\\_src=g&hsa\\_tgt=dsa-19959388920&hsa\\_kw=&hsa\\_mt=&hsa\\_net=adwords&hsa\\_ver=3&gclid=CjwKCAjwj42UBhAAEiwACIhADn-dHLQNN1vNF7YjOx-DrLqIw1yS2MvF1uWum57JTXxdu2AD0cXDhxoCsCkQAvD\\_BwE](https://www.orthocanada.com/en/academy-ktape?utm_term=&utm_campaign=Canada+EN+-+Search+-+OrthoCanada&utm_source=adwords&utm_medium=ppc&hsa_acc=1971735470&hsa_cam=136169080&hsa_grp=139530010212&hsa_ad=586754644292&hsa_src=g&hsa_tgt=dsa-19959388920&hsa_kw=&hsa_mt=&hsa_net=adwords&hsa_ver=3&gclid=CjwKCAjwj42UBhAAEiwACIhADn-dHLQNN1vNF7YjOx-DrLqIw1yS2MvF1uWum57JTXxdu2AD0cXDhxoCsCkQAvD_BwE)  
<https://www.rocktape.ca/medical/education/fmt-basic-and-performance/>
- d. Current research in support of Elastic Taping -  
<https://journals.sagepub.com/doi/full/10.1177/1759720X19869135>

**Modalities Requiring Additional Education Involving Electrical Equipment**

Requires Additional Education - Completion of a College approved course

Rational: Supports the massage therapy scope of practice to make a positive change to the musculoskeletal system of the patient. Massage Therapists in Alberta, as well as some regulated provinces safely and effectively utilize electrical therapies such as TENS, Shockwave and ultrasound to increase effectiveness of their treatments. These modalities are to be used when clinically indicated and to be deemed the most effective treatment for the patient, after patient consent to the treatment is granted. The addition of this modality group can result in faster recovery times for patients, having a positive effect on the finances of Albertans.

Exclusions: Electrical equipment may not be used for diagnostic or surgical purposes. Electrical equipment will only be used with the intention to enhance manual manipulation techniques.

Examples of Modalities in this Category;

#### **TENS (transcutaneous electrical nerve stimulation) -**

- a. Specific Rationale - Supports the massage therapy scope of practice to make a positive change to the musculoskeletal system of the patient. TENS can facilitate injury management by assisting in pain management.
- b. Specific Exclusions - None at this time
- c. Current Courses -  
<https://www.conedinstitute.com/electrotherapy>
- d. Current research in support of TENS -  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6029898/>

#### **Shockwave**

- a. Specific Rationale - Massage Therapists, as well as other healthcare providers (such as Physiotherapists and Chiropractors) in Alberta currently safely and effectively use shockwave therapy to effectively and efficiently treat a variety of conditions such as tendonitis, chronic pain and low back pain.
- b. Specific Exclusions - None at this time
- c. Current Courses -  
<https://shockwavecanada.com/training-education-2/>  
<https://www.embodiaapp.com/courses/986-shockwave-new-course-orthocanada>
- d. Current research in support of Shockwave:  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6029898/>

#### **Therapeutic Ultrasound**

- a. Specific Rationale - Massage therapists and other healthcare providers currently safely and effectively utilize therapeutic ultrasound in treatment. Therapeutic ultrasound has been shown to speed recovery from injury and decrease the number of treatments required in order for a patient to regain mobility.
- b. Specific Exclusions - Cannot be used for diagnostic or surgical purposes.
- c. Current Courses -  
<https://www.conedinstitute.com/therapeutic-ultrasound>  
<https://www.occupationaltherapy.com/ot-ceus/course/therapeutic-modalities-ultrasound-4853>
- d. Current research in support of Therapeutic Ultrasound -  
<https://www.dovepress.com/effectiveness-of-ultrasound-therapy-on-the-management-of-chronic-non-s-peer-reviewed-fulltext-article-JPR>

#### **Laser Therapy**

- a. Specific Rationale - Class 3B lasers and lower-level lasers (Cold laser therapy, LLLT) support the treatment principles of massage therapy by encouraging vasodilation (increased blood flow), decrease pain, and decreasing healing time. Practitioners are expected to still adhere to Alberta's Occupational Health and Safety Act, Alberta's Radiation Protection Program, and use of devices approved by Health Canada.
- b. Specific Exclusions - Class 4 lasers and above, x-rays, and particle accelerators would be excluded from the scope of practice for massage therapists.
- c. Current Courses - <https://www.conedoinstitute.com/laser-led-light-therapy>
- d. Current research in support of Laser Therapy - <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4743666/>  
<https://health-products.canada.ca/mdall-limh/prepareSearch-preparerRecherche.do;jsessionid=ECD3EFB61F6B6D75B20B6CA18FB4CE07?type=active>

### **Modalities Requiring Additional Education Involving Therapeutic Exercises**

Requires Additional Education - Completion of a College approved course

Rational: Massage Therapists, along with other healthcare providers currently successfully utilize advanced therapeutic exercise modalities to expedite the recovery of patients.

Exclusions: The therapist may not perform advanced therapeutic techniques in a group setting.

Examples of Modalities in this Category;

#### **Yoga -**

- a. Specific Rationale - Massage Therapists in Alberta, along with those in regulated provinces safely incorporate Yoga therapies into their practice as a form of therapeutic exercise to enhance the effectiveness of their treatments. Yoga has been shown to be an effective addition to treatment for patients suffering from chronic pain, neuropathy, osteoarthritis and other conditions that Massage Therapists commonly treat.
- b. Specific Exclusions - A massage therapist shall not perform group yoga/stretch therapy sessions but solely apply the practice as therapeutic exercises for patient homecare purposes.
- c. Current Courses - <https://ptcourses.com/course.php?id=1546>  
<https://appihealthgroup.com/buy/therapeutic-yoga-level-1/>
- d. Current research in support of Yoga - <https://pubmed.ncbi.nlm.nih.gov/23249655/>

#### **Kinesiology -**

- a. Specific Rationale - Massage therapists in Alberta, as well as in current regulated provinces utilize Kinesiology to safely enhance the treatment of their patients, specifically during the assessment and therapeutic exercise portion of treatments.
- b. Specific Exclusions - A massage therapist shall not perform group kinesiology sessions but solely apply the practice as therapeutic exercises for patient homecare purposes.

- c. Current Courses - <https://www.ualberta.ca/kinesiology-sport-recreation/programs/undergraduate-programs/bachelor-of-kinesiology.html>  
<https://www.ucalgary.ca/future-students/undergraduate/explore-programs/kinesiology>
- d. Current research in support of Kinesiology - <https://pubmed.ncbi.nlm.nih.gov/2087588/>

### **Modalities Requiring Additional Education Involving Use of an Active Ingredient**

Requires Additional Education - Completion of a College approved course

Rational: Massage Therapists in Alberta, as well as some regulated provinces, currently safely and effectively use the addition of ointments, oils and lotions which include active ingredients to decrease a patient's pain levels via the decrease of nervous system activity, during and post treatment.

Exclusions: Therapists may not perform the application of active ingredients to affect the emotional or psychological health of a patient. Active ingredients may only be used to treat the musculoskeletal system of the body, sympathetic nervous system and related pathologies which are in the general scope of Massage Therapy.

Examples of Modalities in this Category:

#### **Application of Topical Oils/Lotions which Contain Active Ingredients -**

- a. Specific Rationale - Massage Therapists in Alberta, as well as some regulated provinces, currently safely and effectively use the addition of ointments, oils and lotions which include active ingredients to decrease a patient's pain levels via the decrease of nervous system activity, during and post treatment.
- b. Specific Exclusions - Therapists may not perform the application of active ingredients to affect the emotional or psychological health of a patient. Active ingredients may only be used to treat the musculoskeletal system of the body, sympathetic nervous system and related pathologies which are in the general scope of Massage Therapy.
- c. Current Courses - <http://purelotusmassage.com>  
<https://www.elevatedhealtheducation.com/course-offerings>
- d. Current research in support of Topical Oils - [https://www.researchgate.net/publication/343699997\\_EFFECT\\_OF\\_CLASSIC\\_MASSAGE\\_WITH\\_PEPPERMINT\\_OIL\\_ON\\_MUSCLE\\_SORENESS\\_AND\\_MUSCLE\\_STRENGTH\\_DURING\\_RECOVERY\\_FROM\\_EXERCISE](https://www.researchgate.net/publication/343699997_EFFECT_OF_CLASSIC_MASSAGE_WITH_PEPPERMINT_OIL_ON_MUSCLE_SORENESS_AND_MUSCLE_STRENGTH_DURING_RECOVERY_FROM_EXERCISE)  
<https://pubmed.ncbi.nlm.nih.gov/8805113/>

### **Modalities Requiring Additional Education Involving Supplementary Modalities**

Requires Additional Education - Completion of a College approved course

Rational: Supplementary modalities address a category of modalities that may blend physical and energetic work. By incorporating the physical benefits of this work into massage therapy but placing specific exclusions on addressing "energy based" treatment, massage therapy can benefit from the musculoskeletal, neurological and related pathological treatment effects. This category also



addresses a large population of current massage therapists practicing within the province of Alberta for inclusion within the regulatory process.

Exclusions: Therapists may not use alternate modalities which utilize energy based treatments, be it the direct intent of the treatment, or the method by which the modality is performed. Therapists must be able to provide a definite rationale for providing an alternate modality in lieu of a direct treatment to the area of the musculoskeletal system of concern.

Examples of Modalities in this Category;

### **Water-based Treatments (Watsu)**

- a. Specific Rationale - Massage Therapists in Alberta, as well as regulated provinces, currently safely and effectively used water-based treatments to accommodate patients with specific conditions such as Cerebral Palsy, chronic pain, ALS and other muscular dystrophies. Treating patients in water as opposed to on a hard surface allows for the patient to experience an effective treatment with less pain.
- b. Specific Exclusions - A massage therapist shall not perform group water-based sessions but must solely apply the practice as therapeutic exercises for patient homecare purposes.
- c. Current Courses - <https://www.watsu.com/waba/Action.Lasso?-Database=wregistry&-Table=idnumber&-Response=11classes.htm&-Token.3=english&-Random>
- d. Current research in support of Watsu (Water based treatment) - <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7056478/>

### **Craniosacral Therapy**

- a. Specific Rationale - Craniosacral therapy is a modality which has been used by Massage Therapists, Physiotherapists and Chiropractors in Alberta in a safe and effective manner.
- b. Specific Exclusions - Therapists may only incorporate craniosacral techniques which directly relate to the treatment of the musculoskeletal system of the body and related pathologies. Therapists may not incorporate any techniques which treat the psychological health of the patient, or use "energy based" treatments in any manner (ex: use of treatments which relate to a patient's chakra) or any treatment that utilize the use of energy based treatment to meet the goal of a positive effect on the musculoskeletal system. The therapist may not use craniosacral techniques which are specific to treating pathologies of the organs.
- c. Current Courses - <https://www.upledger.com/therapies/courses.php>
- d. Current research in support of Craniosacral Therapy - <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6937867/>

### **Reflexology**

- a. Specific Rationale - Massage Therapists in Alberta, as well as some regulated provinces, currently safely and effectively use reflexology within their practice with the goal of decreasing a patient's pain levels and stress response via the decrease of nervous system activity, during treatment.
- b. Specific Exclusions - Therapists may only incorporate reflexology techniques which directly relate to the treatment of the musculoskeletal system of the body and related pathologies. Therapists may not incorporate any techniques which treat the psychological health of the patient, use "energy based" treatments in any manner (ex: use of

treatments which relate to a patient's chakra), or any treatment that utilize energy based treatment to meet the goal of a positive effect on the musculoskeletal system. The therapist may not use reflexology techniques which are specific to treating pathologies of the organs in any manner.

- c. Current Courses -  
<https://www.reflexinstitute.ca/training.html>
- d. Current research in support of Reflexology -  
[https://reflexology-usa.org/wp-content/uploads/dr\\_shweta\\_research\\_study.pdf](https://reflexology-usa.org/wp-content/uploads/dr_shweta_research_study.pdf)

### **Visceral Manipulation**

- a. Specific Rationale - Supports the massage therapy scope of practice to make a positive change to the musculoskeletal system of the patient. Visceral manipulation can be performed to impact fascial connective tissue and adhesive restrictions within and surrounding the abdominal region to assist in pain management and core mobility, and has a history of safe practice within Alberta.
- b. Specific Exclusions - Therapists may only incorporate visceral manipulation techniques which directly relate to the treatment of the musculoskeletal system of the body and related pathologies. Therapists may not incorporate any techniques which treat the psychological health of the patient, or use "energy based" treatments in any manner (ex: use of treatments which relate to a patient's chakra) or any treatment that utilize the use of energy based treatment to meet the goal of a positive effect on the musculoskeletal system. The therapist may not use visceral manipulation which is specific to treating pathologies of the organs.
- c. Current Courses  
<https://www.barralinstitute.com/>
- d. Current research in support of Visceral Manipulation  
<https://pubmed.ncbi.nlm.nih.gov/27858681/>

### **Thai Massage**

- a. Specific Rationale - Supports the massage therapy scope of practice to make a positive change to the musculoskeletal system of the patient. Thai massage can be performed to impact fascial connective tissue and muscular range of motion and mobility.
- b. Specific Exclusions - Therapists may only incorporate Thai Massage techniques which directly relate to the treatment of the musculoskeletal system of the body and related pathologies. Therapists may not incorporate any techniques which treat the psychological health of the patient, or use "energy based" treatments in any manner (ex: use of treatments which relate to a patient's chakra or meridian system) or any treatment that utilize energy based treatment to meet the goal of a positive effect on the musculoskeletal system. The therapist may not use Thai massage which is specific to treating pathologies of the organs.
- c. Current Courses  
<https://thaiyogamassage.guru/table-method-live/>
- d. Current research in support of Thai Massage  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5495387/>

**Restricted Activities: (Please see Massage Therapy Standards of Practice pg 73)**

**Modalities Requiring Additional Education and Advanced Authorization Involving Needling**

Modalities Requiring Additional Education and Advanced Authorization: Completion of approved course.

Rational: Many massage therapists in other regulated provinces as well as members of The College of Physiotherapists of Alberta and the College of Chiropractors of Alberta use needles in their practice safely and effectively.

Alongside the included proposed additional requirements for a member of the College to be approved for dry needling practice, the base registration competency requirements set out by the future College of Massage Therapists of Alberta will provide the standard of high level anatomy, pathology and physiology knowledge required to provide safe and effective dry needling.

The College of Massage Therapists of Ontario has granted the future Albertan College permission to use any and all of their regulatory standards, practice requirements and approved course lists focused on the use of needles in practice. We have included these in the "Documents of Support" below. As the College of Massage Therapists of Ontario have successfully incorporated the use of needling into their Scope of Practice for a lengthy period of time, and have proven needling to be a safe activity for their registrants to complete, we feel confident utilizing their documents for reference.

Exclusions: A Massage Therapist shall maintain respect for the clearly laid out boundaries of their Scope of Practice which shall be listed in the Standards of Practice and the Annual Declaration of Understanding. The RMT will only perform dry needling and shall not perform any use of needles with the intent to provide Traditional Chinese Medicine in respect for the registrants of the College of Acupuncturists of Alberta.

Examples of Modalities in this Category;

**Dry Needling**

- a. Specific Rational: Dry needling has been shown in some cases to provide immediate relief, decreasing the number of treatments a patient may need- effectively saving Albertan's money. Additionally, with an approved RMT practicing dry needling, patients will be able to continue care with one therapist instead of having to utilize other health benefits or pay out of pocket for a referral to another health care provider such as a physiotherapist or chiropractor.

As Massage Therapy focuses on the musculoskeletal system and related pathologies, and the intent of the practice of dry needling is to create a positive effect to the same system - it is reasonable to associate the modality to the practice. Many of the most common reasons for a patient to seek Massage Therapy care are frequently treated with dry needling by other professionals, such as chronic headaches, pain and rehabilitation post knee replacement, low back pain and various spine disorders.

- b. Specific Exclusions - Work performed under the theories, ideologies or intentions to impact energy, energy fields, Qi, meridian systems, etc. or are currently unsubstantiated by sufficient research-based evidence, will not be deemed within scope for massage therapists. Massage therapists

will only work with the intention to impact the musculoskeletal system, and not organ systems, psychological health, etc.

c. Current Courses -

<https://acupuncturecanada.org/education-certification/courses/dry-needling-program-level-i/>  
<https://mcmasteracupuncture.com>

d. Current research in support of Dry Needling

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7212610/>  
<https://cadth.ca/dry-needling-and-injection-musculoskeletal-and-joint-disorders-review-clinical-effectiveness-cost>

See all documents of support:

- <https://www.cmta.com/about-the-profession/rmts-and-acupuncture/>
- <https://www.cmta.com/assets/Introduction-to-competency-indicator-grid.pdf>
- <https://www.cmta.com/assets/Standard-of-Practice-for-Acupuncture.pdf>
- <https://www.cmta.com/confirmed-acupuncture-education-programs/>
- <https://www.cmta.com/assets/Confirmed-Acupuncture-Education-Programs.pdf>

**APPENDIX 8**  
**ASSOCIATION MEMBERSHIP AND CONTINUING EDUCATION**  
**REQUIREMENTS DOCUMENTS**



## **CMMOTA Full Massage Therapist Membership Eligibility**

To become a full member of the Association the following qualifications must be met:

- Graduated from a Massage Therapy program that is recognized by the Association, with a minimum of 2200 hours of post-secondary education in Massage Therapy
- Provide proof of active membership in good standing with the provincially legislated College of Massage Therapy within the jurisdiction in which they practice if applicable
- Submit proof of a valid certification in Standard First Aid and Level C CPR issued within the past 3 years. Online courses are not acceptable.
- Provide a Vulnerable Sector Check completed within 90 days of applying. Online checks are not acceptable unless completed through a recognized police service.
- Obtain insurance coverage through the Association's broker, or an alternative broker if so required
- Shall not hold membership in any other Massage Therapist Association, as defined above
- Shall reside within a Province or Territory of Canada
- Proof that our English Fluency Policy is met (as required)
- Provide proof of Canadian Citizenship, or Permanent Residency in Canada, or a valid Work Permit permitting the practice of Massage Therapy
- Provide a current letter of good standing if previously registered with another Association or Regulatory College

## **CMMOTA Full Massage Therapist Membership Requirements**

All Full Massage Therapist members of the CMMOTA are required to:

- Attend at least 1 Annual General Meeting per 3-year Continuing Education Credit ("CEC") Cycle, or pay the fee specified in the current Fee Schedule
- Maintain valid Standard First Aid and Level C CPR. \*Online courses are not acceptable
- Complete the required Continuing Education Credits during each 3-year cycle
- Maintain a current Vulnerable Sector Check. Online checks are not acceptable unless completed through a recognized police service
- Comply with the CMMOTA Bylaws, Policies and Procedures, CMMOTA Standard of Practice for Massage Therapists, CMMOTA Scope of Practice for Massage Therapists, and CMMOTA Code of Ethics
- Maintain insurance coverage through the Association's broker



- Maintain a current Annual Declaration form
- Practice only within a Province or Territory of Canada
- Shall not hold membership in any other Massage Therapist Association, as defined above
- If required, provide, and maintain a current work permit issued by Citizenship and Immigration Canada permitting the member to practice Massage Therapy
- Provide proof upon renewal of active membership in good standing with the provincially legislated College of Massage Therapy within the jurisdiction in which they practice if applicable

## **CMMOTA CEC Submission Cycle:**

- The current 3-year period is from January 1, 2022 to December 31, 2024. This period is the same for all members. Submission deadline for this cycle is December 31, 2024. All members are responsible for maintaining credits in good standing and for submitting proof of same within the required timeline.
- Any credits accumulated in the current cycle in excess of the 30 required may be carried forward into the next cycle to a maximum of 15 credits each, per profession.
- The CMMOTA requires a basic level of training in massage of 2200 hours or more from an approved school as a prerequisite for membership, as an RMT, this training or part thereof cannot be used for RMT CEC credits.
- The required CEC credits are prorated depending on your effective date for becoming a Full Massage Therapist member:

## **Failure to Comply with CEC Requirements**

Failure to comply with the CEC credit requirements will result in the implementation of [Disciplinary Policy for Non-Compliance Regarding Continuing Education Credits](#):

Failure to comply with the AGM Attendance requirement will result in the implementation of [Disciplinary Policy for Non-Compliance Regarding Annual General Meeting Attendance](#)

**For more information on the above referenced policies, please visit here:**

<https://cmmota.com/cmmota-policies-and-procedures/>



**CERTIFIED REGISTERED**  
Massage Therapist Association

## **CRMTA Membership Levels:**

### Active Membership:

The following RMTs may apply for an Active Membership with the CRMTA:

- Have successfully completed a course of study in the Practice of Massage Therapy consisting of a minimum of 2,200 hours in Massage Therapy theory and clinical practicum approved by the Board.
- Enrolled in a program of more than 2,200 hours, they are eligible to be an Active Member as soon as they provide evidence of having successfully completed 2,200 hours. Membership is dependant on completion of their full program and renewal cannot be provided until final certificate of course if provided.
- Provide a copy of a criminal record check completed within 30 days of application including vulnerable sector from a recognized police service, no third-party documents will be accepted.
- Demonstrated English proficiency through providing Education or training.
- Copy of Canadian Government-issued photo identification and proof of eligibility to work in Canada if not a Canadian citizen.
- Comply with CRMTA Bylaws and Code of Ethics.
- Provide a current Standard First Aid with Level C (CPR) or higher from a recognized provider. Online training is not approved.
- A member in good standing from a Regulatory College
- Must provide a letter of good standing if they held previous membership with another association.

### **Maintaining Active Membership requirements**

- Attend 1 AGM in a 3-year cycle.
- Maintain 30 CE credits in a 3-year cycle from approved courses.
- Cannot hold membership with another Massage Therapy Association.
- Complete annual declaration form upon renewals.
- Maintain current police and vulnerable sector check as this is routinely audited by CRMTA.
- Maintain a current Standard First Aid with Level C (CPR) or higher from a recognized provider. Online training is not approved.
- Comply with CRMTA Bylaws, Standards of Practice, Code of Ethics and all policies.
- Work within only their training and approved scope of practice.



## ☐ Associate Membership:

The following RMTs may apply for an Associate Membership with the CRMTA:

- Be enrolled in a Massage Therapy program of a minimum of 2,200 hours that when completed will meet the requirements necessary for active membership.
- Have completed a minimum of 1,200 hours of education and received a certificate of completion and transcript for that amount of training from a Massage Therapy program recognized by the Association.
- Provide a copy of a criminal record check completed within 30 days of application including vulnerable sector from a recognized police service, no third-party documents will be accepted.
- Only practice Massage Therapy under supervision and within their level of competence and within the scope of practice of their current level of training.
- Provide a current Standard First Aid with Level C (CPR) or higher from a recognized provider. Online training is not approved.
- Cannot bill under an Associate membership for 3<sup>rd</sup> party billing.
- Cannot hold membership with another Massage Therapy Association
- Copy of Canadian Government-issued photo identification and proof of eligibility to work in Canada if not a Canadian citizen.

## ☐ Student Membership:

Student Memberships are for students currently enrolled in a Massage Therapy program with a minimum of (2,200) hour as recognized by the Association but have not yet met the requirements to be an associate member or active member.

- Student Members may only practice within their level of competence and within the scope of practice of their current level of training.
- No fee for student memberships.

## ☐ Inactive Membership:

Any individual who is, or was, or is entitled to be, registered as an active member is eligible to be an inactive member in any membership year where they will not be providing Massage Therapy services to members of the public.

- Pay membership on time.
- Maintain Standard First Aid and CPR certifications.



**CERTIFIED REGISTERED**  
Massage Therapist Association

**Affiliate Membership:**

In order to become an affiliate member of the association, a person must have an interest in the profession of massage therapy even if they are not a massage therapist or enrolled in a Massage Therapy program.



## MTAA Active Membership Requirements

- Have supplied a copy of current Standard First Aid and Level “C” (or higher) CPR Certificates; and
- Have supplied a copy of a Criminal Records Check, inclusive of the Vulnerable Persons Sector completed within 90 days of the application completed at your local city police or RCMP detachment (note: third-party online versions such as those through companies such as Backcheck are not accepted)
  - Please be advised that the MTAA will temporarily accept a photocopy or scanned copy of your official CRC results to process your membership activation. The MTAA requires that the official document be mailed to our office to complete your application. If you receive an official digital copy of your results, please contact our office to confirm your submission at 403-340-1913.
  - For more information on the MTAA’s Criminal Record Check requirements.
- Have supplied a copy of Canadian Government-issued photo identification; and
- Have supplied a copy of proof of eligibility to work in Canada if not a Canadian Citizen (ie: work visa); and
- Have demonstrated English language fluency by the submission of a high school or post-secondary transcript, or proof of successful completion of a standardized language evaluation. To learn more about MTAA’s English language requirement
- If the applicant is or has been a member of a Regulatory College or another professional association as a Massage Therapist, a letter of Good Standing or a letter of Membership Confirmation is also required to be submitted.

### **All Active members must meet the following to maintain their current membership:**

- Must pay their annual dues prior to the annual renewal deadline.
- Must maintain valid Standard First Aid and CPR- Level “C” (or higher) at all times.
- Must submit a Criminal Record Check inclusive of the vulnerable persons sector every three (3) years.
- Must have 30 Professional Development Credits (CECs) confirmed on their member profile by the end of the 3-year education cycle.



## NHPC Regular Membership

Prepared for: The Alberta Working Group for Regulation

Date: November 9, 2023

### Membership Requirements

To join as a NHPC Regular (practising) member as a massage therapist, applicants must:

- provide proof of graduation from an [NHPC-recognized two-year, Canadian massage therapy program](#)\*;
- provide a Police Information Check with Vulnerable Sector Search completed within the last 90 days,
  - if the Police Information Check indicates there is information to disclose, you will need to undergo a Good Character Interview with the NHPC.
- provide proof of meeting the association's [English Language Proficiency \(ELP\)](#) requirements.
- additionally:
  - If applicable, provide copy of their certificate of membership from an NHPC recognized organization and/or letter of good standing for the period of membership;
  - If the name on their application is different than the name on the documents submitted with it, provide proof of name change.

\*[Internationally trained massage therapists](#) must meet additional requirements to join the association.

### Eligibility and Good Character Reporting

To join and maintain NHPC Regular membership, applicants and members must confirm they:

- meet the [NHPC's English Language Requirements](#);
- are legally entitled to work in Canada;
- have never had a finding of professional negligence or malpractice against me;
- have not been charged with, pleaded guilty to, or found guilty of any offence inside or outside of Canada that is inconsistent with the proper professional behavior of an NHPC-recognized holistic health practitioner, including a conviction under the Criminal Code (Canada) or the Controlled Drugs and Substances Act (Canada), for which no pardon has been granted;



## Natural Health Practitioners of Canada Praticiens de la Santé Naturelle du Canada

- have not been the subject of an investigation or disciplinary process in a jurisdiction that regulates NHPC-recognized holistic health practices or by another association;
- have not been found guilty of a disciplinary finding in a jurisdiction that regulates NHPC-recognized holistic health practices or by another association;
- have not had a licensing sanction imposed by a jurisdiction that regulates NHPC-recognized holistic health practices;
- have not had my membership revoked by another association.

### Professional Practice

To maintain a professional practice, NHPC Regular massage therapists must understand, acknowledge, and will adhere to:

- completing and maintaining client records;
- completing a preliminary assessment to identify contraindications to services;
- obtaining a signed waiver from clients acknowledging disclosure of service limits, contraindications, and potential side effects;
- adhering to informed consent at all times;
- adhering to [NHPC Massage Therapy Standards of Practice](#);
- adhering to all [NHPC positions and statements for a professional practice](#);
- acquire municipal licensing, if applicable in their jurisdiction;
- advising the NHPC whether they sell products as part of their practice.

### Responsibilities of Maintaining Membership

To maintain NHPC Regular membership, members must understand and acknowledge, and will adhere to:

- notifying the NHPC in writing, within 30 days of any change of personal or business contact information;
- adhering to [NHPC Bylaws](#);
- adhering to [NHPC Code of Ethics](#);
- complying with the [NHPC Continued Competency Program \(CCP\)](#), which includes maintaining current First Aid/CPR certification, and learning in ethics, professional, and personal development.
- be enrolled in the [NHPC Professional Liability Insurance Program](#) for medical malpractice;
- advising AON and NHPC if you practice a modality not recognized by NHPC, to arrange professional liability insurance for those practices,
  - The NHPC Professional Liability Insurance Program covers only the modalities the NHPC has recognized the member to practise and limits;



Natural Health Practitioners of Canada  
Praticiens de la Santé Naturelle du Canada

- hold their membership in good standing,
  - The NHPC may notify insurance companies regarding eligibility criteria when a member is not in good standing. This will result in their clients not being reimbursed for services they provide by their insurance company.
- understanding that termination of membership can occur as a result of:
  - failure to pay membership fees on time,
  - non-compliance with the CCP,
  - Complaints Resolution Process.

### NHPC Privacy Notice

To join and maintain NHPC Regular membership, applicants and members must confirm they:

- have read the NHPC Member Privacy Policy and consent to the collection, use, and disclosure of their personal information in accordance with the [NHPC Member Privacy Policy](#).

**APPENDIX 9**

**LIST OF MASSAGE THERAPIST ASSOCIATIONS IN ALBERTA WITH  
CONTACT INFORMATION**

## **Alberta Massage Therapy Associations Contact Information**

Alberta Regional Massage Therapy Association

Mailing Address: 4986 92 Ave., Edmonton, AB T6B 2V4

Email: [info@albertarmta.com](mailto:info@albertarmta.com)

Phone: (587)784-9999

Canadian Massage and Manual Osteopathic Therapists Association

Mailing Address: #300, 2965 Bremner Ave., Red Deer, AB T4R 1S2

Email: [info@cmmota.com](mailto:info@cmmota.com)

Phone: (403)356-1160

Certified Registered Massage Therapist Association

Mailing Address: #137 Bonnie Doon Centre, 8330 82 Ave NW., Edmonton, AB T6C 4E3

Email: [registrar@crmta.com](mailto:registrar@crmta.com)

Phone: (780)271-7682

Massage Therapist Association of Alberta

Mailing Address: #204, 37 Beju Industrial Drive, Sylvan Lake, AB T4S 0K9

Email: [info@mtaalberta.com](mailto:info@mtaalberta.com)

Phone: (403)340-1913

Natural Health Practitioners of Canada Association

Mailing Address: 230-9440 49 St., Edmonton, AB T6B 2M9

Email: [growingtogether@nhpcanada.org](mailto:growingtogether@nhpcanada.org)

Phone: 1-888-711-7701



**APPENDIX 10**  
**LETTERS OF SUPPORT FROM ARMTA**

**May 29, 2024**

**Attention To: Christy Kasur, President TC-CMTA on behalf of the Working Group**

**Re: Letter of Endorsement for the Application to Regulate Massage Therapy in Alberta**

I am writing to express my strong support for the application that the Working Group has put together to regulate the massage profession in Alberta. As an association for Massage Therapy in Alberta, we believe that regulating this profession is a crucial step towards ensuring the highest standards of care, safety, and professionalism for both practitioners and clients. Alberta regional Massage Therapy Association (ARMTA) supports the Working Group and is willing to provide a supportive role in regulation of Massage Therapy.

We firmly believe that the regulation of the massage profession in Alberta will lead to improved health outcomes for clients and a stronger, more respected profession. I am confident that this initiative will have a positive impact on the health and well-being of Albertans and will contribute to the professionalization of massage therapy in our province.

Please do not hesitate to reach out if you need any further assistance. ARMTA looks forward to working alongside the Working Group closely for regulation massage therapy in the province of Alberta and having an independent massage therapy college.

**Sincerely,**



**Aliana Kanji**  
**Registrar**





# ARMTA

ALBERTA REGIONAL MASSAGE  
THERAPY ASSOCIATION

+1 (587) 784-9999  
info@albertarmta.com  
4986 92 Avenue, NW, Edmonton, AB.

May 9, 2021

Attention To: Christy Kasur, President TC-CMTA on behalf of the Working Group

Re: Letter of Support for Regulation of Massage Therapy

Dear Christy,

I am writing to you regarding the work that is being done by the working Group regarding regulation of the massage therapy profession in Alberta. The Working Group has the Alberta Regional Massage Therapy Association's (ARMTA) willingness to provide a supportive role in regards to massage therapy regulation and we look forward to being apart of the Working Group's efforts.

Please do not hesitate to reach out if you need any further assistance. ARMTA looks forward to working with the Working Group closely for regulating massage therapy in the province of Alberta.

Regards,

Aliana Kanji

*Registrar*



# ARMTA

ALBERTA REGIONAL MASSAGE  
THERAPY ASSOCIATION

+1 (587) 784-9999

info@albertarmta.com

4986 92 Avenue, NW. Edmonton, AB.

May 19, 2023

Attention To: Christy Kasur, President TC-CMTA on behalf of the Working Group

Re: Letter of Support for an Independent College of Massage Therapy

Dear Christy,

I am writing to you regarding the work that is being done by the working Group regarding regulation of the massage therapy profession in Alberta. The Working Group has the Alberta Regional Massage Therapy Association's (ARMTA) willingness to provide a supportive role in regards to creating an independent college for Massage Therapists like other regulated provinces (such as BC and Ontario).

Please do not hesitate to reach out if you need any further assistance. ARMTA looks forward to working with the Working Group closely for regulating massage therapy in the province of Alberta and having an independent massage therapy college.

Regards,

Aliana Kanji

*Registrar*

**APPENDIX 11**

**LETTER OF SUPPORT FROM THE CANADIAN MASSAGE AND MANUAL  
OSTEOPATHIC THERAPISTS ASSOCIATION (CMMOTA)**



Honorable Adriana LaGrange, ECA  
Minister of Health  
423 Legislature Building  
10800 - 97 Avenue NW  
Edmonton, AB T5K 2B6

May 30, 2024

**RE: Canadian Massage & Manual Osteopathic Therapists Association  
Support for the Submission of the Revised Application to Regulate Massage  
Therapy in Alberta**

Dear Minister LaGrange,

Please accept this letter as official notice that on behalf of the Canadian Massage & Manual Osteopathic Therapists Association, and the Board of Directors, we fully support the *FORMAL SUBMISSION TOWARD THE REGULATION OF MASSAGE THERAPY UNDER THE HEALTH PROFESSIONS ACT* Submitted by The Transitional Council for the College of Massage Therapists of Alberta (TC-CMTA), The Canadian Massage and Manual Osteopathic Therapists Association (CMMOTA), The Certified Registered Massage Therapist Association (CRMTA), The Massage Therapist Association of Alberta (MTAA), and The Natural Health Practitioners of Canada Association (NHPC).

As an association, we have no concerns with the content contained in the application that has been presented to us.

We commend the work that members of the Alberta Working Group have completed to draft the necessary documents to support the submission of the joint Application for the Regulation of Massage Therapy in Alberta.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Pp Heather Goddard, Executive Director

for CMMOTA Board of Directors  
Canadian Massage & Manual Osteopathic Therapists Association

**APPENDIX 12**

**LETTER OF SUPPORT FROM THE CERTIFIED REGISTERED MASSAGE  
THERAPIST ASSOCIATION (CRMTA)**



**CERTIFIED REGISTERED**  
Massage Therapist Association

June 11, 2024

To Whom It May Concern,

**RE: Certified Registered Massage Therapist Association Support for the Regulation of Massage Therapy in Alberta**

This letter on behalf of The Certified Registered Massage Therapist Association (CRMTA) of Alberta is to confirm the CRMTA's support for the application for the regulation of Massage Therapists in Alberta.

The CRMTA appreciates all the hard work and effort that has gone into this application along with the joint efforts of all associations involved in the Alberta Working Group. CRMTA supports the Alberta Working Group in this application toward regulation for the protection of the public.

As an association, we do not have any concerns with the content presented in application, as it was presented to our board of directors for review.

CRMTA believes this is a very positive step forward toward regulation in Alberta.

Sincerely,

Amanda Scheltgen  
Chair, Board of Directors, CRMTA



**APPENDIX 13**

**LETTER OF SUPPORT FROM THE MASSAGE THERAPISTS  
ASSOCIATION OF ALBERTA (MTAA)**



May 28, 2024

Janine Gotzke, Chair  
Massage Therapist Association of Alberta (MTAA)  
204 - 37 Beju Ind. Dr  
Sylvan Lake, AB T4S 0K9

To Whom It May Concern,

It is with great pleasure that I am writing on behalf of the Massage Therapist Association of Alberta Board of Directors to confirm our support of the application for the regulation of massage therapists in Alberta.

The MTAA supports the protection of the public that regulation will provide Albertans. This has been a long-awaited goal that will help elevate the profession and provide Albertans the much-needed health care they need through Massage Therapy. The hard work, passion, and sacrifices made by the Working Group to get this application completed with accuracy are much appreciated. Regulation is a positive step for the Massage Therapy profession.

Sincerely,

Janine Gotzke  
Chair, Board of Directors, MTAA

**Massage Therapist Association of Alberta**

204 – 37 Beju Industrial Drive Sylvan Lake Alberta T4S 0K9 Phone: 403-340-1913

**APPENDIX 14**

**LETTER OF SUPPORT FROM THE NATURAL HEALTH PRACTITIONERS  
OF CANADA ASSOCIATION (NHPC)**



Natural Health Practitioners of Canada  
Praticiens de la Santé Naturelle du Canada

June 2, 2024

Attention: Alberta Working Group for the Regulation of Massage Therapy and Transitional Council for the College of Massage Therapists of Alberta


RE: NHPC Endorsement of AWGRMT and TC-CMTA's Application for Regulation

I am writing on behalf of the Natural Health Practitioners of Canada (NHPC) as the President of our Board of Directors to express our full support for the application for the regulation of massage therapy in the province of Alberta.

The NHPC Board of Directors reviewed the Formal Submission toward the Regulation of Massage Therapy under the Health Professions Act. As such, this letter confirms the NHPC Board of Directors' formal endorsement of the Alberta Working Group for the Regulation of Massage Therapy (AWGRMT), and Transitional Council for the College of Massage Therapists of Alberta's (TC-CMTA) application called "FORMAL SUBMISSION TOWARD THE REGULATION OF MASSAGE THERAPY UNDER THE HEALTH PROFESSIONS ACT" for regulation.

NHPC remains committed to working collaboratively with all stakeholders to support the implementation of the regulation of massage therapy. We are confident that through our collective efforts, we can achieve our shared goal of ensuring the highest standards of care for all Albertans.

Regards,

DocuSigned by:  
  
6517210DE6734E6...

Trish Cole

President, NHPC Board of Directors

**APPENDIX 15**  
**COMPREHENSIVE MODALITY COMPARISON DOCUMENT**

MODALITY	CMTA - Proposed Scope	CMTBC	CMTNB	CMTNL/CMTPEI	CMTO
<b>Legend</b> <b>YES - Included</b> <b>NO - Not Included</b> <b>"Blank" - No Information</b>		*Scope only lists specifically what cannot be performed and states it's is NOT AN EXHAUSTIVE list CMTBC - Website - retrieved 2024-04-04	CMTNB Policy Statements and Position Statements - September 2015/ December 2022	*None specifically listed outside basic techniques (Effleurage, trigger points, deep tissue, etc.) CMTPEI - Standards of Practice - 2019-02-03 CMTNL - Standards of Practice - January 2007 / Policy and Position Statements - June 2018	CMTO - Website - Nov 24, 2020 - rescinded Complementary Modalities Policy and Modalities Considered to be Outside the Scope of Practice Policy. Moving away from list-based format to professional judgement of scope.  Inhalation Statement - September 1999. Acupuncture Education and Authorization Policy - September 20, 2022.
Active Release	YES	YES	YES	YES	YES
Acupressure	YES	YES	YES	YES	YES
Acupuncture/Dry Needling	YES	NO	YES	YES	YES
Alexander Method	NO	NO	YES	YES	YES
Aquatic Massage Therapy (watsu)	YES	YES	YES	YES	YES
Aromatherapy	NO	NO	YES	YES	NO
Bioflex Laser Therapy	YES	NO	YES	YES	YES
Craniosacral	YES	YES	YES	YES	YES
Cupping (Myofascial/Silicone)	YES	NO	YES	YES	YES
Electrical therapy techniques	YES	NO	YES	YES	YES
Energy-based Modalities	NO	NO	NO	NO	NO
Feldenkrais	NO	NO	YES	YES	YES
Frequency Specific Microcurrent (low energy protocol only),	YES	NO	YES	YES	YES
Fire Cupping	NO	NO	NO	NO	NO
Graston Technique	YES	YES	YES	YES	YES
Guided Imagery	NO	NO	YES	YES	NO
Healing Touch	NO	NO	YES	NO	NO
Hot Stone Therapy	YES	YES	YES	YES	YES
Hydrotherapy - Baths, hot/cold application	YES	YES	YES	YES	YES
Infant Massage	YES	YES	YES	YES	YES
Inhalation Therapy	NO	NO	YES	YES	YES
Intra-oral massage	YES	YES	YES	YES	YES
Joint Mobilization - High Velocity Low Amplitude	YES	YES	YES	YES	YES
Instrument Assisted Soft Tissue Manipulation (IASTM)	YES	YES	YES	YES	YES
Kinesiology	YES	NO	YES	YES	YES
Labour Support	YES	YES	YES	YES	YES
Low Intensity Laser Therapy	YES	NO	YES	YES	YES
Lymphatic Drainage Therapy (LDT)	YES	YES	YES	YES	YES
Meditation	NO	NO	YES	YES	NO

Myofascial Release (fascia work)	YES	YES	YES	YES	YES
Neuromuscular Therapy	YES	YES	YES	YES	YES
Pilates (Individual session for therapeutic exercise)	YES	YES	YES	YES	YES
Prenatal/Perinatal	YES	YES	YES	YES	YES
Proprioceptive Neuromuscular Facilitation (PNF)	YES	YES	YES	YES	YES
Reflexology	YES	NO	NO	YES	
Reiki	NO	NO	YES	YES	NO
Remedial exercise (stretching, strengthening and other rehabilitative exercises)	YES	YES	YES	YES	YES
Shockwave Therapy	YES	NO	YES	YES	YES
Suction Cupping	YES	NO	YES	YES	YES
Taping (for example, K-Taping)	YES	YES	YES	YES	YES
TENS Therapy	YES	NO	YES	YES	YES
Trager	NO	NO	YES	YES	NO
Ultrasound	YES	NO	YES	YES	YES
Use of Active Ingredients	YES	YES	YES	YES	YES
Visceral Manipulation	YES	YES	YES	YES	YES
Yoga (Individual session for therapeutic exercise)	YES	YES	YES	YES	YES