



May 1, 2024

House Committee on Business Affairs and Labor  
200 E Colfax Avenue  
Denver, CO 80203

***RE: Support of CO SB 201, Increase Massage Therapy Education Program Hours***

Dear Chair Amabile and Members of the House Committee on Business Affairs & Labor,

The Federation of State Massage Therapy Boards (FSMTB®) is a not-for-profit corporation with membership comprised of massage therapy regulatory boards and agencies in the United States and its territories. The Colorado Division of Professions and Occupations – Office of Massage Therapy Licensure is a member of the FSMTB. The mission of FSMTB is to support its member boards in their work to ensure that the practice of massage therapy is provided to the public safely and competently.

FSMTB is writing in support of Colorado Senate Bill 201, changing the minimum number of curriculum hours for a massage therapy licensure applicant from 500 hours to 650 hours to support competent practice and public safety.

It would be to the benefit of school owners, massage therapy license applicants, and the consuming public for the State of Colorado to adopt 650-hour minimum education requirements to meet:

- a) the Entry Level Massage Education Blueprint for minimum number of initial education hours;
- b) the hours requirement in the Model Massage Practice Act;
- c) the number of education hours that provide the best chance to pass the MBLEx; and
- d) and the massage education standard set forth in the Interstate Massage Compact (IMPact).

In 2012, the Coalition of National Massage Therapy Organizations\* convened to work on an entry-level analysis of massage education. One of the goals of this **Entry Level Analysis Project (ELAP)** was to **identify the minimum number of hours of initial core education that massage schools need to teach to prepare graduates for the safe and competent practice of massage therapy**. The final recommendation of the Coalition is that a minimum of 625 hours of instruction is required for students to acquire the core skills to safely practice massage therapy. **FSMTB supports the position that 625 hours of education is the minimum required for entry-level competence** pursuant to the Entry Level Massage Education (ELME) Blueprint from the [ELAP](#).

**The 625-hour minimum education hours standard is adopted in the FSMTB Model Massage Therapy Practice Act, which was developed by massage therapy regulators.** This is the only empirically based and legally defensible standard supported by all seven national organizations in the Coalition. In addition to developing the Model Massage Practice Act, FSMTB develops and administers the Massage & Bodywork Licensing Examination (MBLEx®), at no cost to the states. The MBLEx is currently the assessment standard for the practice of massage in 46 states and some municipalities among unregulated states. The MBLEx is the profession's sole psychometrically fair, valid, reliable, and legally defensible competency examination. It assesses minimum proficiency for safe and competent practice and is not technique-specific or specialty-focused, nor does it center on any specific jurisdiction's scope of practice. The MBLEx provides unified, nationally verified, entry-level standards for the practice of massage and bodywork therapy to ensure the health, safety, and welfare of the consuming public. **FSMTB's data shows that individuals with 600-650 hours of initial education who take the MBLEx have the highest probability of passing the exam when compared to individuals with lower and higher initial education hours.**

The FSMTB collaborated with the Council of State Governments (CSG) to develop the Interstate Massage Compact. The IMPact allows individuals who meet the requirements to practice in all states that are compact members. One of the main requirements is that massage therapists must have at least 625 clock hours of massage education. The IMPact benefits several different stakeholders including massage therapists, massage licensing authorities, states, and military families. The IMPact, provides their licensees with opportunities for multistate practice, supporting the relocation of military families, improving public safety, and promoting workforce development by reducing unnecessary regulatory burdens.

Finally, the U.S. Department of Education has published rulemaking that revokes the long-standing “150% Rule” as of July 1, 2024. The amended rule requires all Title IV education programs to change their program hours to exactly what the state minimum requires. This change applies to **all** programs that fall under “Gainful Employment” which generally include for-profit career schools and non-degree programs at non-profit and public institutions. The rule change will have a negative impact on massage therapy regulation and education programs that offer programs that exceed the state minimum. Programs that do not currently meet the minimum state-required hours will be forced to restructure their programs and resubmit them for accreditation and approval. Some massage schools may close. Many states have either increased or already begun the process of increasing minimum education hours. Tennessee has increased their minimum hours from 500 to 650. Florida, Louisiana, Missouri, Nevada, North Carolina, and South Dakota are currently looking at increasing their minimum requirement to at least 625 hours. According to a survey conducted by FSMTB in 2022, roughly 70% of massage therapy schools nationwide provide programs with at least 625 clock hours. The average number of clock hours provided by all schools surveyed was 723 hours. **Therefore, the majority of massage therapy schools already provide education programs that meet or exceed the minimum recommended hours.**

Failure to increase the hours may result in exacerbating the existing shortage of massage therapy professionals, due to eliminating the federal loan program eligibility of massage schools and programs, including those at community colleges, as well as reducing the amount of federal student loan funding for massage therapy students below the standard required for safe and competent practice.

Thank you for the opportunity to bring this information to you. Should you have any questions about IMPact or the information above, please contact me at [ahernandez@fsmtb.org](mailto:ahernandez@fsmtb.org) or (913) 681-0380.

Sincerely,



Ashley Hernandez, MPA  
Government Relations Specialist, FSMTB

\*Coalition of National Massage Therapy Organizations includes the Alliance for Massage Therapy Education (AFMTE), American Massage Therapy Association (AMTA), Associated Bodywork & Massage Professionals (ABMP), Commission on Massage Therapy Accreditation (COMTA), Federation of State Massage Therapy Boards (FSMTB), Massage Therapy Foundation (MTF), and the National Certification Board for Therapeutic Massage & Bodywork (NCBTMB).