**AFMTE Responds to the FSMTB MOCC Proposal**

The Alliance For Massage Therapy Education intends to be an organization that works *collaboratively* to bring the major stakeholders together. The current [FSMTB](http://www.fsmtb.org/downloads/2012.03.01_MOCC_Proposal.pdf) and [NCBTMB](http://www.ncbtmb.org/pdf/press_releases/14mar_12_NewExamFinal2.pdf) press releases demonstrate that these organizations are shifting and calibrating themselves so that we can be a “full fledged” profession.

We have been asked to comment on the [FSMTB MOCC Proposal](http://www.fsmtb.org/downloads/MOCC_Guide.pdf) by some of our members.  These comments are intended both for our members and the entire profession. We support Recommendations 1 and 2, but have major concerns about 3.

Here are some of the biggest concerns we’re hearing:
1. CE Providers are saying “the State Boards are going to stop requiring CE hours and that therapists won’t take classes.”

This is a legitimate concern.  We think that many therapists would not keep up with contemporary developments in the field, and that this could degrade the overall quality of massage.  This could also impact public safety.

2. What is ‘No Fail Testing’ in the MOCC proposal?

This type of assessment allows for people to take a test and if they pass the questions, then that’s it. If they miss a question, then they will be presented with content about that topic until they demonstrate that they understand the content and answer the question correctly.

3. People are expressing concerns about the cost of this additional assessment.

Costs will probably be nominal to cover fees associated with the development of the materials, costs of technology, and maintenance of records. Hopefully these costs will be shared by the boards as part of the fees they already collect for license renewals.

The MOCC proposal was created as a way to move the State Boards to act together and to ensure public safety.  We feel that professional development is important, but the oversight of it is beyond the resources and/or the scope of most of the state boards.  This task is best left to a group that specializes in postgraduate education. Currently, that is the NCBTMB.  While the result of the Task Force meeting in Chicago was not what the AFMTE Board (and many others) were anticipating, we look forward to shifting the paradigm. One of the most rewarding aspects of this meeting was that all of the stakeholders agreed to work together.  Even though NCBTMB wasn’t included, the Task Force decided to support their efforts to continue overseeing the CE landscape and strengthening their system to assure high quality professional development and public safety.  And within days of the original MOCC press release, NCBTMB released news that aligns with this. The AFMTE is still involved in bridging and keeping open dialog between the groups.

Here are the AFMTE Board’s comments on the three recommendations:
**Recommendation 1:**
Recommendation 1 enables the State Boards to fulfill their mandate to protect the public. The bottom line is that states are charged with the duty to ensure public safety – not excellence. Advanced training should be under the purview of credentialing organizations and not licensing boards. By creating the MOCC, the FSMTB is meeting its obligations. This assessment module does not replace any CE hours that a state might require.

**Recommendation 2:**
Recommendation 2 simply asserts the need for the State Boards to outline what they need from a contractor who is overseeing required CE courses and providers. We agree that as long as there are CE requirements in the state laws, the Massage Boards should provide guidelines for the process of approving courses and providers.

**Recommendation 3:**
Recommendation 3 eliminates state mandated CE requirements. We advocate shifting oversight to the NCBTMB by rule and contractual arrangement, but (for the time being) maintain the CE requirements in the statutes as part of re-licensure to provide for both professional development and public safety, until advanced CE requirements are updated and firmly established with the various professional associations (e.g., ABMP, AMTA, AOBTA) and certification boards (e.g., NCBTMB for general certification and eventually specialty certifications).

**In Closing:**
The AFMTE Board recommendations are:
1. We support MOCC Recommendation 1 (the creation of the assessment).
2. The states shouldn’t have the responsibility of overseeing the approval of courses or providers, but should provide input to those who do the oversight.
3. The states should continue to mandate Professional Development until the advanced CE system is updated.
4. There should be one organization that oversees this for the FSMTB and State Boards.  Currently, that could be the NCBTMB.
5. The oversight process needs to be strengthened to ensure reliable professional development and public safety. We are happy to work collaboratively to help accomplish this bold step.

There is still much work to be done. The Alliance for Massage Therapy Education supports lifelong learning and continued professional development for all therapists. The proposal and any modifications based on feedback will help us continue to work toward a “full fledged” profession. Make your voice heard! Go to the [FSMTB comment link](https://docs.google.com/spreadsheet/embeddedform?formkey=dFRUbmJFODVMOEJsTUNYT0FnZlB2dEE6MQ).