

Board, Massage , RLD

From: Ellen Santistevan <laguera64@gmail.com>
Sent: Wednesday, August 21, 2019 5:35 AM
To: Board, Massage , RLD
Subject: [EXT] comment on proposed rule changes

I am an independent RMTI writing concerning Section 7, 61-12C-17, Continuing Education. In 61-12C-17-D, you state that " a continuing education provider who was an active registered independent massage therapy instructor on the effective date of this 2019 act shall submit to the board a syllabus and a one time fee for any course not previously approved by the board." Further, in 61-12C-17-E, you state that RMTIs will have to submit proof of licensure, proof of two years' experience in the area of instruction, a course syllabus, a resume and a fee TBD by the board *for every single new course*. Also, although the requirement for a teaching license have supposedly been removed, in 61-12C-17-F, it states that "a license shall be renewed by submitting a renewal application on a form provided by the board." So, do we or don't we need a teaching license?

It is unclear to me (a) why this paperwork should be required for every single new course submitted and (b) why we should be required to do this on top of the already extensive requirements to get a class approved by the NCBTMB. As someone who has gone through the vetting process to get approved as a CE provider by the NCBTMB, I find it onerous to have to repeat the process at a state level.

Would independent RMTIs have to pay a fee for each of our classes just for the privilege of teaching in NM?
Are the fees and paperwork requirements annual?
What are "Non-Continuing Education Providers?" and how is it that they can provide CEUs?
What kinds of documentation does the Board require as "proof of two years' experience in the area of instruction"?

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