

Kerry Hagner
Re: SB 531
March 13, 2022

To whom it may concern:

Regarding SB531

I have been practicing massage therapy since 2014 and I am nationally board certified through NCBTMB. I currently practice in the state of Kansas.

I am very happy that the State is endeavoring to create licensure at the state level for the massage therapy profession. However, I am concerned some of the language may needlessly and unintentionally limit the scope of practice and so oppose the bill as it is currently written.

The prohibition of “*physical therapy joint mobilization or manipulation*” (pg. 2, line 1) is, I believe, too vague a restriction. When taken with the massage therapy scope description at Sect. 2 Para. F (page 1, lines 22-31), it appears that no movement whatsoever of the limbs or joints of the massage receiver is allowed.¹ I understand that joint mobilization and manipulation from a Physical Therapy standpoint refers to forced movement at the articular surface of joints. This is not something a Massage Therapist does. It is unclear, however, what movement of limbs IS considered within the scope of practice as the bill is currently written since there is no other mention of movement.

I suggest that “joint movement or stretching within normal physiologic range of motion” be added to the scope wording in Section 2 Para F to remove this ambiguity. It may also be useful to clarify the wording of the prohibition of “physical therapy joint mobilization or manipulation” to make it clear the bill prohibits the forced movement of joints at the articular surface rather than any mobilization of the joint.

Joints are inherently mobilized when applying pressure to the soft tissues of the body. The body’s tissues are all integrated together. Manipulation of muscles and connective tissue is inseparable from manipulation of bones and their joints.

Passive² limb mobilization is often required to directly address a muscle or muscle group. To follow this regulation as currently written, massage therapists could not move their clients’ limbs, neck, or head during a session.

Passive stretching and movement at the joint assists massage therapists determine where there are soft tissue restrictions that may benefit from massage. The ability to move the body around

¹ The only mention of movement in the scope language is: “*It is the application of a system of structured touch, pressure, movement and holding of the soft tissue of the human body...*”. I understand this to mean movement of the soft tissue rather than any movement of limbs.

² Passive motion means the practitioner is moving the limb or joint of the massage receiver, as opposed to active motion in which the receiver moves his or her own limb or joint.

the joint also helps the massage therapist determine if the restriction is not soft-tissue related and should be referred out.

Inclusion of clearer language will eliminate this ambiguity.

Thank you for your time and attention.

Kind regards,

Kerry Hagner