



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

SHELLY EDGERTON
DIRECTOR

MICHIGAN BOARD OF MASSAGE THERAPY

OCTOBER 8, 2018 MEETING

APPROVED MINUTES

In accordance with the Open Meetings Act, 1976 PA 267, as amended, the Michigan Board of Massage Therapy met on October 8, 2018, at the Ottawa Building, Conference Room 4, 611 West Ottawa Street, Lansing, Michigan 48933.

CALL TO ORDER

Terese Hunter, Acting Chairperson, called the meeting to order at 9:30 a.m.

ROLL CALL

Members Present: Terese Hunter, Public Member, Acting Chairperson
Charlie Franklin, LMT, Professional Member
Tina Latham-Enix, LMT, Professional Member
JT Stout, LMT, Professional Member, Chairperson
Jodi Wiley, LMT, Professional Member
Lynn Wolf, LMT, Professional Member

Members Absent: Tiffany Gennety, LMT, Professional Member
Katie Kiter, Public Member
Beth Miazga, LMT, Professional Member
Judy Robinson, Public Member

Staff Present: Dena Marks, Analyst, Boards and Committees Section
Stephanie Wysack, Board Support, Boards and Committees Section

ROLL CALL/PUBLIC COMMENT REMINDER

Hunter requested introductions of Board Members.

APPROVAL OF AGENDA

MOTION by Wiley, seconded by Wolf, to approve the agenda, as presented.

A roll call vote was taken: Yeas: Franklin, Latham-Enix, Wolf, Stout, Wiley, Hunter
 Nays: None

MOTION PREVAILED

APPROVAL OF MINUTES

MOTION by Franklin, seconded by Wiley, to approve the July 9, 2018 meeting minutes, as presented.

A roll call vote was taken: Yeas: Franklin, Latham-Enix, Wolf, Stout, Wiley, Hunter
 Nays: None

MOTION PREVAILED

REGULATORY CONSIDERATIONS

None

OLD BUSINESS

None

NEW BUSINESS

2019 Public Notice

Wysack presented the 2019 Public Notice.

HPRC Discussion

Marks requested that the Board have potential candidates contact the Department with a letter of interest and a curriculum vitae.

Rules Discussion

Marks went through public comments with the Board and the Rules Committee's responses (Attachment #1). The next steps in the process were explained.

MOTION by Franklin, seconded by Wolf, to approve the Draft Rules as amended today.

A roll call vote was taken: Yeas: Franklin, Latham-Enix, Wolf, Stout, Hunter
 Nays: Wiley

MOTION PREVAILED

Chair Report

Stout noted the importance of ~~consistently~~ *consistency* in the rules, especially with the increase in disciplinary matters.

Department Update

None

PUBLIC COMMENT

Mike Krombean with the American Massage Therapy Association (AMTA) stated he was thankful for the forward motion in the rules. He stated that a curriculum committee would be fantastic.

ANNOUNCEMENTS

The next regularly scheduled meeting will be held January 7, 2019 at 9:30 a.m. in the Ottawa Building, 611 W. Ottawa Street, Conference Room 4, Upper Level Conference Center, Lansing, Michigan.

ADJOURNMENT

MOTION by Franklin, seconded by Wiley, to adjourn the meeting at 10:45 a.m.

A roll call vote was taken: Yeas: Franklin, Latham-Enix, Wolf, Stout, Wiley, Hunter
 Nays: None

MOTION PREVAILED

Minutes approved by the Board on January 7, 2019.

Prepared by:
Stephanie Wysack, Board Support
Bureau of Professional Licensing

October 8, 2018

**2017-086 LR Massage Therapy
Public Comment Summary
Rules Committee and Board responses to June 6, 2018 Public Comment**

Testimony/Comments Received:

1. Sarah Ackerman, LMT
2. Maria Asbel, LMT
3. William Ash
4. Su Bibik, Inst. for Massage Ed.
5. Sheila Birdsall
6. Bil Bitz, Irene's Myomassology Inst.
7. Munita Blair
8. Jessica Carter, MI Amer. Massage Ther. Assn.
9. Candy Cornell, Horses in Harmony
10. Laura Embleton, Assoc. Bodywork & Massage Profs.
11. Randy Fillion
12. Wayne Forest
13. Cathy Fruhner
14. Ryan Gauthier, HFHS Ctr. Integrative Medicine
15. Tasha Gavan, LMT
16. Gail Grace
17. Christine Grimm, RN
18. Raechel Haller, LMT
19. Sue Hidalgo
20. Dawn Hogue, Comm. Massage Ther. Acred.
21. Loree Kennedy, Inst. of Sanative Arts/Tranquility
22. Mike Krombeen, Midwest Strategy Gp.
23. Stacy Leasure, LMT
24. Nancy Levitt, Lakewood Sch. Ther. Massage
25. Paula Nedzinskas, LMT
26. Martha Pacheco, CMT
27. Melissa Patino, LMT
28. Brian John Piccolo, LMT
29. Zsuzsanna Pozar, Sacred Space Wellness
30. Caitlin Read
31. Jeanette Roach, LMT
32. Gretchen Roekle, LMT
33. Mike Ryan, Marquette Sch. Ther. Massage
34. Mable Sharp, Healthcare Alts.
35. Racquel Singleton-Quiney
36. Kathy Skubik, Irene's Myossology Inst.
37. Stephanie Smith
38. Renee Solano-Szuba, LMT
39. Pamela Speck, LMT
40. James Specker, Amer. Massage Ther. Assn.
41. Rachel Tice
42. Sophia Treppa
43. Katie Trinklein
44. Kwame Turner, LMT
45. Diane Urquhart
46. Gail Valor, LMT
47. Vicki Walter
48. Keith Yocum BA, LMT, NCBTM

Rule 338.722 Supervised curriculum; massage therapist; requirements

| Rule Numbers | Commenter | Comment |
|---------------------------------|--|---|
| 338.722(2)(b)(i)(A) | 4, 8, 10, 24, 31, 36, 40, | The commenters stated that they supported the increase in the total number of instruction hours to 625 but opposed requiring 75 clinical hours because it would require a reduction in classroom hours. The commenters ask that the clinical hours requirement be 60 hours. |
| | 21 | The commenter stated that 75 clinic hours is unnecessary and that the rule should state that a minimum of 40 clinic hours is required. |
| | 34 | The commenter stated that requiring 75 hours of clinical experience would reduce valuable class time. She stated that there should be more flexibility in the educational program. |
| | 45 | The commenter supported increasing the supervised clinical hours to 75. |
| Rules Committee Response | <p>R 338.722(2)(b)(i)(A) (Commenters 4, 8, 10, 24, 31, 36, 40) – The rules committee declined to make the requested change as it believes that requiring 75 clinical hours will result in improved technical training.</p> <p>R 338.722(2)(b)(i)(A) (Commenters 21) – The rules committee declined to make the requested change as it believes that requiring 75 clinical hours will result in improved technical training.</p> <p>R 338.722(2)(b)(i)(A) (Commenters 34) – The rules committee declined to make the requested change as it believes that effective pedagogy requires significant hands-on experience in the clinical setting and that requiring 75 clinical hours will result in improved technical training.</p> <p>R 338.722(2)(b)(i)(A) (Commenters 45) – No change was requested, so no changes were made.</p> | |

BOARD RESPONSE: THE BOARD _____ WITH THE RULES COMMITTEE’S RECOMMENDATION.

Rule 338.724 Supervised student clinic; requirements

| Rule Numbers | Commenter | Comment |
|---------------------------------|--|--|
| R 338.724 (2)(a) | 4, 8, 10, 24, 36, 40 | The commenters requested that the requirement that all clinical hours be earned on school premises be removed because they believed that students may benefit from earning some clinical hours in other settings. They stated that this will help to further the development of therapists and benefit the industry by offering the opportunity to work in places like senior centers, sports medicine clinics, etc. |
| | 21 | The commenter stated that the requirement that the hours be performed in a clinic would not permit an instructor to hold a supervised event in a senior living facility, palliative care facility, etc. |
| | 32 | The commenter suggested that the requirement that students complete clinical work on school premises should be expanded to include rehab centers, wellness clinics, etc. to provide a richer educational and training opportunity. |
| R 338.724(2)(b) | 32 | The commenter suggested that off-site work be supervised by faculty or by a licensed non-faculty member. |
| Rules Committee Response | <p>R 338.724(2)(a) (Commenters 4, 8, 10, 24, 31, 36, 40) – The rules committee agreed that earning some supervised student clinical hours in other settings may be beneficial but believes that the majority of the supervised student clinical hours should be earned on school premises to ensure adequate student participation and faculty supervision.</p> <p>R 338.724(2)(a) (Commenter 21) – The rules committee agreed that some supervised student clinical hours may be earned in other settings but believes that the majority of the supervised student clinical hours should be earned on school premises to ensure adequate student participation and faculty supervision.</p> <p>R 338.724(2)(a) (Commenter 32) – The rules committee agreed that some supervised student clinical hours may be earned in other settings but believes that the majority of the supervised student clinical hours should be earned on school premises to ensure adequate student participation and faculty supervision.</p> <p>R 338.724(2)(b) (Commenter 32) – The rules committee declined to make the requested change because the supervised student clinic requirement is a part of the student’s curriculum, and as such, should be under the supervision of a faculty member.</p> | |

Based on the Rules Committee’s recommendations, the proposed rule would read:

R 338.724 Supervised student clinic; requirements.

Rule 24. (1) Before beginning the supervised student clinic required under R 338.722, a student shall complete not less than 20 hours of courses or coursework in pathology.

(2) A supervised student clinic shall satisfy all of the following requirements:

(a) **A minimum of 60 supervised clinic hours shall be held on school premises. A maximum of 15 supervised clinic hours may be held off school premises.**

(b) The clinic shall be supervised by a licensed massage therapist who is a faculty member of the school offering the supervised curriculum. The supervising massage therapist shall be present on the premises and be readily accessible to the students at all times during the clinic.

(c) The ratio of students to supervising massage therapists shall not exceed 15 students to 1 supervising massage therapist.

(3) A supervising massage therapist shall ensure that a student possesses the appropriate education, experience, and skills before allowing the student to provide a massage to any member of the public during a supervised student clinic.

BOARD RESPONSE: THE BOARD WITH THE RULES COMMITTEE’S RECOMMENDATION.

Rule 338.726 Accreditation; standards; adoption by reference

| Rule Numbers | Commenter | Comment |
|--------------|----------------------|--|
| R 338.726 | 4, 8, 10, 24, 36, 40 | The commenters opposed the requirement that all schools be accredited because accreditation is expensive and cost-prohibitive. They asked that COMTA endorsed curriculum be acceptable for schools. The commenters stated that the rules do not permit the board to require accreditation. |
| | 18 | The commenter stated that she is concerned that requiring schools to be accredited will place a burden on small private operations. |
| | 20 | The commenters opposed the requirement that all schools be accredited because accreditation is expensive and cost-prohibitive. They asked that COMTA endorsed curriculum be acceptable for schools. The commenter requested that board-approved schools include those “whose curriculum is endorsed by the Commission on Massage Therapy Accreditation.” |
| | 21 | The commenter stated that requiring that a school be accredited is unnecessary. The commenter stated that passing the national examination regulates the applicant’s education by default because a licensee’s ability to pass the national exam will reflect the education that he or she received. |

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| | 32 | The commenter supported holding massage therapy schools to the standards of accreditation to ensure the development of competent professionals. The commenter stated that this is a step toward further developing the field of practice. |
| | 33 | The commenter did not support requiring accreditation. He stated that the requirement seemed to be more about the money than quality education. |
| Rules Committee Response | | <p>R 338.726 (Commenters 4, 8, 10, 24, 36, 40) – The rules committee declined to make the requested change because the rule approves a massage therapy supervised curriculum that meets the requirements as a NCBTMB assigned school or is accredited by CHEA, and there is no cost to apply to become a NCBTMB assigned school.</p> <p>R 338.726 (Commenter 18) – The rules committee declined to make the requested change because the rule approves a massage therapy supervised curriculum that meets the requirements as a NCBTMB assigned school or is accredited by CHEA, and there is no cost to apply to become a NCBTMB assigned school.</p> <p>R 338.726 (Commenter 20) – The rules committee declined to make the requested change because the rule approves a massage therapy supervised curriculum that meets the requirements as a NCBTMB assigned school or is accredited by CHEA, and there is no cost to apply to become a NCBTMB assigned school.</p> <p>R 338.726 (Commenter 21) – The rules committee declined to make the requested change as the rule does not require that a massage therapy supervised curriculum be accredited. And the rules committee believes that a student should be required to attend a rigorous educational program that will prepare him or her to pass the MBLEX.</p> <p>R 338.726 (Commenter 32) – No change was requested so no changes were made. The rules committee thanks the commenter for commenting.</p> <p>R 338.726 (Commenter 33) – The rules committee declined to make the requested change because the rule approves a massage therapy supervised curriculum that meets the requirements as a NCBTMB assigned school or is accredited by CHEA, and there is no cost to apply to become a NCBTMB assigned school.</p> |

BOARD RESPONSE: THE BOARD _____ WITH THE RULES COMMITTEE’S RECOMMENDATION.

Rule 338.734 Examinations; passing scores

| Rule Numbers | Commenter | Comment |
|---------------------------------|---|---|
| 338.734 | 1 | The commenter expressed concern about her ability to keep her license because she was licensed before the examination was required. |
| 338.734(a) | 4, 8, 10, 24, 36, 40 | The commenters requested that the board include language addressing the result if the MBLEX ceases to exist. |
| Rules Committee Response | <p>R 338.734 (Commenter 1) – The rules committee declined to make any changes because no changes were requested and an examination for entry level competence is required by statute for licensure, not renewal.</p> <p>R 338.734 (Commenters 4, 8, 12, 24, 36, 40) The rules committee agreed to change the rule to provide for the MBLEX’s replacement, if the MBLEX ceases to exist.</p> | |

Based on the Rules Committee’s recommendations, the proposed rule would read:

R 338.734 Examinations; passing scores.

Rule 34. An applicant for licensure shall pass either of the following:

- (a) The massage and bodywork licensure examination (mblex), **or its replacement**, offered by the federation of state massage therapy boards (fsmtb). The passing score for the mblex examination is the passing score recommended by the fsmtb.
- (b) The national certification examination for therapeutic massage and bodywork (ncetmb) offered by the national certification board for therapeutic massage and bodywork (ncbtmb), if taken prior to November 1, 2014. The passing score for the ncetmb examination is the passing score recommended by ncbtmb. Ncetmb examination scores will be accepted by the department.

BOARD RESPONSE: THE BOARD _____ WITH THE RULES COMMITTEE’S RECOMMENDATION.

Rule 338.737 Licensure by endorsement; requirements

| Rule Numbers | Commenter | Comment |
|---------------|----------------------|--|
| 338.737(2) | 4, 8, 10, 24, 36, 40 | The commenters requested that the requirement for licensure by endorsement be reduced to 3 years. |
| 338.737(3)(b) | 15 | The commenter requested that the rule requiring passage of a national examination be eliminated for licensure by endorsement because the public is protected by ensuring that the educational standards are set high enough. |

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| Rules Committee Response | <p>R 338.737 (Commenter 4, 8, 10, 24, 36, 40) The rules committee declined to make the requested change because it believes that the public safety is better protected by ensuring that licensure by endorsement be granted only to an applicant who has satisfied the requirements for renewal of his or her license at least once.</p> <p>R 338.737 (Commenter 15) The rules committee declined to make the requested change because an applicant is required to pass an examination that measures entry level competence by statute, MCL 333.17961.</p> |
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BOARD RESPONSE: THE BOARD _____ WITH THE RULES COMMITTEE’S RECOMMENDATION.

Rule 338.741 Acceptable continuing education; requirements; limitations

| Rule Numbers | Commenter | Comment |
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| 338.741 | 16 | The commenter asked if Bowenwork qualifies for purposes of accumulating CE credit hours. |
| 338.741(1)(b) | 5, 18 | The commenters stated that the requirement to complete at least 6 CE credit hours in a live and in-person program or activity is overburdensome. |
| | 47 | The commenter stated that requiring 6 hours of live, in-person CE credit hours now, when she renews in October, is an abrupt change. |
| 338.741(1)(d) | 2, 13, 17 | The commenter stated that courses in reflexology and Reiki should be included for purposes of accumulating CE credit hours. |
| | 3, 7, 27, 39, 41, 42 | The commenter stated that courses covering valuable modalities should not be excluded for purposes of accumulating CE credit hours. |
| | 4, 8, 10, 24, 36, 40 | The commenters asked the board to reconsider the prohibition on earning CE credit hours for courses primarily focused on practices excluded from licensure under the Code. The commenters stated that the exemption from licensure for practicing these methods should not exclude a licensed MT from earning credit for attending. |
| | 6 | The commenter asked that modalities such as reflexology, structural integration, and Shiatsu be included for purposes or accumulating CE credit hours. |
| | 9 | The commenter asked that reflexology, Reiki, polarity, and craniosacral therapy be included for purposes of accumulating CE credit hours. |
| | 11 | The commenter asked that Thai massage, Asian bodywork, and other modalities be included for purposes of accumulating CE credit hours. |

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| | 12 | The commenter asked that reflexology, Asian bodywork, polarity, Feldenkris, Trager, Shaitso, and structural integration be included for purposes of accumulating CE credit hours. |
| | 14 | The commenter stated that Reiki is used by many practitioners and it is an adjunctive therapy to massage. It has been studied for a variety of conditions and knowledge of its use makes a massage therapist more marketable. |
| | 19 | The commenter stated that the NCBTMB and the ABMP both hold Reiki in high regard as a topic for CE. |
| | 23 | The commenter asked that reflexology, Asian bodywork, polarity, Feldenkris, Trager, Shaitso, Reiki, and structural integration be included for purposes of accumulating CE credit hours. |
| | 25 | The commenter asked that Reiki, reflexology, polarity, Shaitso, cupping, and other Eastern medicine type modalities be included for purposes of accumulating CE credit hours. |
| | 28, 29 | The commenter stated that modalities such as Feldenkrais, Trager, polarity, Asian bodywork, Reiki, Shiatsu, reflexology, and structural integration should be included for purposes of accumulating CE credit hours. |
| | 30 | The commenter stated that she has seen client changes and personal growth through modalities such as Reiki, polarity, reflexology, and Shiatsu and that she would like to continue learning these modalities. |
| | 35, 44 | The commenter asked that reflexology be included for purposes of accumulating CE credit hours. |
| | 37 | The commenter asked that reflexology and Shaitso be included for purposes of accumulating CE credit hours. |
| | 38 | The commenter asked that structural integration and Feldenkrais be included for purposes of accumulating CE credit hours. |
| | 46 | The commenter asked that reflexology, Reiki, polarity and Shiatsu be included for purposes of accumulating CE credit hours. |
| | 48 | The commenter asked that Reiki and Shaitso be included for purposes of accumulating CE credit hours. |
| 338.741(1)(f) | 5 | The commenter stated that it is not necessary to take ethics every licensing cycle. |
| 338.741(2) | 4, 8, 10, 24, 36, 40 | The commenters asked that the board permit licensees to accumulate CE credits using the least restrictive approach. The commenters suggested that the following providers be approved: massage therapy or bodywork therapy schools or training programs approved; institutions of higher education; and local, state, or national chapters of professional |

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| | | organizations that address improvement of the profession, including but not limited to the National Certification Commission for Acupuncture and Oriental Medicine, the National Certification Board for Therapeutic Massage and Bodywork, the Federation of State Massage Therapy Boards, ABMP, and the AMTA. |
| 338.741(2)(activity code 1) | 21 | The commenter stated that CEBroker should be added to the approved programs to provide more CE choices while maintaining oversight of CE programs. |
| | 26 | The commenter objected to the accreditation only requirement for CE credit hours. The commenter stated that accredited or licensed schools would give the licensee more options to determine what works best for him or her. |
| | 33 | The commenter supported expanding continuing education providers to give more choices. |
| | 43 | The commenter stated that the types of providers allowed to provide CE should be expanded. |
| Rules Committee Response | | <p>R 338.737 (Commenter 16) The rules committee declined to make a change as there was no change requested by the commenter.</p> <p>R 338.741(1)(b) (Commenters 5, 18) The rules committee declined to make a change as it believes that 6 hours is the acceptable minimum for live, in-person CE hours.</p> <p>R 338.741(1)(b) (Commenter 47) The rules committee declined to make a change as there was no change requested by the commenter.</p> <p>R 338.741(1)(d) (Commenters 2, 13, 17) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.</p> <p>R 338.741(1)(d) (Commenters 3, 7, 27, 39, 41, 42) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.</p> <p>R 338.741(1)(d) (Commenters 4, 8, 10, 24, 36, 40) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.</p> |

R 338.741(1)(d) (Commenter 6) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 9) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 11) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 12) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 14) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 19) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 23) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 25) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenters 28, 29) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 30) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 35, 44) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 37) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 38) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 46) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(d) (Commenter 48) The rules committee declined to make any changes as it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17957.

R 338.741(1)(f) (Commenter 5) The rules committee declined to make a change as no change was requested.

R 338.741(2) (Commenters 4, 8, 10, 24, 36, 40) The rules committee declined to make a change because it believes that continuing education should be specifically related to the scope of practice of a licensed massage therapist as described in MCL 333.17959 and that the suggestion that the licensee be permitted to

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| | <p>accumulate CE credits in the least restrictive approach is not in the best interest of the public health, safety, and welfare.</p> <p>R 338.741(2)(activity code 1) (Commenter 21) The rules committee declined to make a change as it believes that approved provider oversight is needed to ensure the public health, safety, and welfare of Michigan citizens. The courses sponsored by CEBroker and approved by the NCTMB or FSMTB are already included in the proposed rules.</p> <p>R 338.741(2)(activity code 1) (Commenter 26) The rules committee declined to make the requested change because the rule does not limit approval to programs offered by an accredited school. The rule also approves a program that is offered or approved by the NCBMB or the FSMTB.</p> <p>R 338.741(2)(activity code 1) (Commenter 33) The rules committee declined to make the requested change because it believes that the approved providers offer a wide variety of options to a licensee and that the oversight provided by the approved providers offers the greatest protection to the health, safety, and welfare of Michigan citizens.</p> <p>R 338.741(2)(activity code 1) (Commenter 43) The rules committee declined to make the requested change because it believes that the approved providers offer a wide variety of options to a licensee and that the oversight provided by the approved providers offers the greatest protection to the health, safety, and welfare of Michigan citizens.</p> |
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BOARD RESPONSE: THE BOARD _____ WITH THE RULES COMMITTEE’S RECOMMENDATION.

Rule 338.752 Client Records

| Rule Numbers | Commenter | Comment |
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| 338.752 | 5 | The commenter stated that the complexity of the rule is silly and burdensome. The commenter stated that the clients are not seeking medical care so extensive records are pointless. |

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| Rules Committee Response | R 338.752 (Commenter 5) The rules committee declined to make a change as it believes that the standards of practice in the rules, pursuant to MCL 333.17963, require accurate client record keeping and those records must be retained pursuant to MCL 333.16213. |
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BOARD RESPONSE: THE BOARD _____ WITH THE RULES COMMITTEE'S RECOMMENDATION.

Retention of manual therapy/bodywork and Insurance claims

| Rule Numbers | Commenter | Comment |
|---------------------------------|---|---|
| | 32 | The commenter stated that the retention of manual therapy/bodywork with massage and insurance claims should be addressed further in the future. |
| Rules Committee Response | The rules committee thanks the commenter for these comments for future consideration. | |