

Subject: Response to Notice of Request for Information (RFI) on the Department of Veterans Affairs (VA) Massage Therapist Standard of Practice (89 Fed. Reg. 62868)

On behalf of the American Massage Therapy Association (AMTA), we are pleased to submit our response to the Department of Veterans Affairs' (VA) Request for Information (RFI) regarding the development of a national standard of practice for VA Massage Therapists.

As the largest professional association representing over 105,000 massage therapists nationwide, AMTA is dedicated to advancing the profession by promoting research that demonstrates its efficacy, advocating for fair standards, supporting state licensure, and conducting outreach to inform the public and policymakers about its benefits.

The American Massage Therapy Association (AMTA) asserts that standards of practice are essential to maintaining safety, professionalism, consistency, and integrity within the massage therapy profession. These standards serve as a foundational framework for ethical interactions between practitioners and clients, promoting client welfare and safeguarding well-being. Moreover, they play a pivotal role in advancing the continuous development and elevation of the profession by establishing clear guidelines that reinforce the quality and ethical standards expected of massage therapists.

AMTA takes pride in leading the massage therapy industry through robust research funding—for example, the funding of a two-year study, *Massage Service Integration in a Military Primary Care Clinic: Implementation and Impact Study*, awarded by the Massage Therapy Foundation to the Defense and Veterans Center for Integrative Pain Management (DVCIPM)—along with educational initiatives and active policy engagement at both the state and federal levels. We offer our organization as a resource to assist in developing these critical national standards. While there was limited opportunity for comment during the 2023 listening session, the current framework provides a solid foundation, and we are confident that AMTA can contribute meaningfully to the VA's efforts.

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We commend the VA's dedication to addressing the healthcare needs of our nation's veterans and integrating clinical, evidence-based massage therapy into the VHA Whole Health system of care, covered by veterans' medical benefits packages. Furthermore, we appreciate the VA's continued recognition of the National Certification Board for Therapeutic Massage and Bodywork certification as a measure of quality and educational competency.

The current standards for VA employees and community care providers require massage therapy practitioners to meet qualifications for basic or advanced training and to maintain appropriate licensure and credentials. AMTA fully supports these requirements as necessary measures to ensure the delivery of high-quality care.

We would also like to address a related issue: the reimbursement policies for massage therapy services, specifically the recent application of Medicare's Multiple Payment Procedure Reduction (MPPR) policy to massage therapy codes by the VA. Unlike other forms of therapy, massage is currently treated as a single service, regardless of the number of "units" provided in a session. We believe this is a misapplication of a policy designed for other therapies, such as physical and occupational therapy. Massage therapy is one of the most requested treatments by veterans, and reducing reimbursement rates in this way risks exacerbating existing workforce shortages and further limiting veterans' access to necessary care.

Thank you for the opportunity to provide feedback on these critical issues. AMTA stands ready to offer any additional information or technical assistance that may support the VA in this process.

Sincerely,



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(jspecker@amtamassage.org).

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