

College of COMPLEMENTARY HEALTH PROFESSIONALS OF BC

Notice to the Profession The Use of an RMT's Feet for the Delivery of Treatment is Not Within the Scope of Practice of an RMT

Applies to Registered Massage Therapists

The College of Complementary Health Professionals of BC was created on June 28, 2024 through the amalgamation of four health regulatory colleges:

- College of Chiropractors of BC
- College of Massage Therapists of BC
- College of Naturopathic Physicians of BC
- College of Traditional Chinese Medicine Practitioners and Acupuncturists of BC

All current requirements for standards of clinical and ethical practice issued by the four colleges remain in place upon amalgamation.

This document was created by the College of Massage Therapists of BC and will be updated to reflect the amalgamation.

Notice to the Profession

November 24, 2021

The Use of an RMT's Feet for the Delivery of Treatment is Not Within the Scope of Practice of an RMT

CMTBC advises registrants that the use of an RMT's feet for the delivery of treatment to a patient is not within the scope of practice for massage therapy.

Effective immediately, registrants who currently provide and bill for massage using the RMT's feet *as part of the provision of massage therapy services* are advised to cease doing so.

Scope of Practice

"Scope of practice" refers to the activities that registered massage therapists are educated and authorized to perform, which are established by reference to the legislated definition of "massage therapy" in section 1 of the <u>Massage Therapists Regulation</u> (the "Regulation").

The Regulation states that registrants of the College may practise massage therapy. Massage therapy is defined as meaning the health profession in which a person provides, for the purpose of developing, maintaining, rehabilitating or augmenting physical function, or relieving pain or promoting health, the services of

- assessment of soft tissue and joints of the body, and
- treatment and prevention of physical dysfunction, injury, pain and disorders of soft tissue and joints of the body by manipulation, mobilization and other manual methods.

Registrants must practice within their scope of practice, like all regulated health professionals. CMTBC is aware that there are various techniques and modalities that involve use of the practitioner's feet to apply pressure to a patient's body. These include, but are not limited to, Ashiatsu, Thai-Mashiatsu/Mashing and Ki-Hara.

All forms of treatment delivered through the use of an RMT's feet fall outside the scope of practice for massage therapy as established by section 1 of the *Regulation*.

Registrants may still provide services that fall outside the scope of practice of a registered massage therapist if they comply with CMTBC Bylaws, which states as follows:

Advertising of services that fall outside the scope of practice

78.91 If a Registrant is also trained to provide a service or technique that falls outside the scope of practice of a massage therapist as prescribed by the Regulation

- a. that Registrant may advertise that service or technique so long as
 - i. that non-massage therapy service is not linked to or associated with her status as a Registrant, and
 - ii. there is a clear separation of professional services that fall within and outside the scope of practice of Registrants,
- b. that Registrant must use separate letterhead, business cards, statements of account and similar documents for her non-massage therapy service, and
- c. that Registrant must not bill for massage therapy services while using an occupational title of the non- massage therapy profession.

In simple terms, this means that RMTs may provide a "service or technique" that is not massage therapy, but must not do so in a way that identifies them as RMTs or suggests that they are relying on their RMT status. Also, they are not permitted to bill for such services as massage therapy.

As set out in section 78.9(1) of Part F.1 of the Bylaws, RMTs may only describe their massage therapy practices by listing:

- 1. the professional services that RMTs are trained in and capable of providing as registrants of CMTBC;
- 2. the techniques that RMTs have been trained to provide as registrants of CMTBC; or
- 3. the typical types of injuries or health problems that RMTs are trained to assess and treat as registrants of CMTBC, providing however that the professional services or techniques or the types of injuries or problems so listed fall within the scope of practice of a massage therapist as prescribed under the Regulation. (emphasis added)

Provision of Treatment Through the Use of the RMT's Feet

The use of (and billing for) treatment provided through the use of an RMT's feet as part of the provision of massage therapy services violates section 9(d) of the College's Standards of Practice (Schedule "D" to the College's Bylaws), which requires that registrants maintain awareness of, and practice within, the current scope of practice of massage therapy in British Columbia. A violation of the College's Standards of Practice may be subject to investigation and professional discipline under the *Health Professions Act*.

CMTBC advises registrants who currently provide and bill for the provision of massage using their own feet *as part of the provision of massage therapy services* to stop doing so, effective immediately.