



December 9, 2019

Mayor Fougere and Councillors,

Your Worship, Councillors, let me introduce myself. My name is Jeremy Sayer, and I am the Government and Industry Relations Manager with the Canadian Massage and Manual Osteopathic Therapists Association. As an association we proudly represent over 1800 therapists from coast to coast to coast including over 150 therapists here in the province of Saskatchewan. I am here to speak before you today regarding Bylaw 2019-64 – Proposed Zoning Bylaw Amendment – Body Rub Parlours.

I want to start by commending you in taking this important step in distinguishing zoning between Therapeutic Massage Therapy, and Body Rub Establishments. As an association, this is one of the many things that we continue to strive to see changed in medium to large municipalities across the nation. In this you have shown great leadership and are to be set as an example for other jurisdictions to follow.

The reason that I am here before you this evening is the result of an unfortunate situation that occurred when administration did their environmental scan regarding this very important amendment. In July of 2019 our association was in the midst of a name change to reflect the addition of a second therapist designation to our association. We went from being known as the Remedial Massage Therapists Association to being known as the Canadian Massage and Manual Osteopathic Therapists Association, or CMMOTA for short. During this time of transition our website was down for a short period of time. Perhaps because of this, or some other factor, our association was not considered when the proposed bylaw amendment was written. As such, the bylaw, as it currently reads has only the Massage Therapists Association of Saskatchewan (MTAS), and the Natural Health Practitioners of Canada (NHPC) listed as acceptable grantors of credentials for massage therapists.

We became aware of this missing piece of Bylaw 2019-64 on December 5 and have since contacted the administration team here at the City of Regina. We have been told by administration that if we have level of equivalency similar to that of the other two accepted credential grantors, that an amendment should be proposed to include us in the bylaw.

What I am asking for today, based on the information which I will present shortly, is that you introduce an amendment to the Bylaw to include the Canadian Massage and Manual



Osteopathic Therapists Association (CMMOTA) as an additional Association through whom credentials for Therapeutic massage will be required to be maintained.

The reasons that I ask for this are two-fold. The first has to do with the requirements that we as CMMOTA maintain in order for a massage therapist to become a full member, and to receive a membership number. These are outlined in CMMOTA's bylaws which can be found at the website listed below:

<https://cmmota.com/wp-content/uploads/2019/08/Bylaws-of-CMMOTA-Final-June-18.pdf>

It states on page 2 under section 4.2 –

“4.2. Classes of Membership and associated eligibility requirements are as follows:

4.2.1. Full Massage Therapist Membership

4.2.1.1. Graduated from a Massage Therapy program that is recognized by the Association, with a minimum of 2200 hours of post-secondary education in Massage Therapy;

4.2.1.2. Standard First Aid and Level “C” CPR issued within the past 3 years;

4.2.1.3. Criminal Record and Vulnerable Sector Check;

4.2.1.4. Insurance coverage through the Association's broker; and

4.2.1.5. Such further and other requirements as may be amended from time to time.”

If you compare these with the requirements of MTAS – whose bylaw documentation can be found at the following website:

<https://www.saskmassagetherapy.com/doc/AGM%20Bylaws%20revised%202019.pdf>

It states on Page 29 under section 11.1 the following:

“11.1 Eligibility for Membership

(a) Candidates must have successfully completed a 2,200-hour curriculum-based massage therapy training program from a recognized education program.

(b) Candidates who have successfully completed a course in massage therapy at an educational institute outside of Saskatchewan that the Education Committee, in accordance with the MTAS bylaws, considers to be the equivalent to the core curriculum currently advised for Saskatchewan schools.



- (c) Possess a current CPR Level “C” and Standard First Aid Certification.
- (d) Proof of successful completion of the MTAS Membership Qualifying Examination both practical and written.
- (e) Proof of registration as a Registered Massage Therapist in good standing from a legislated Canadian province or a Canadian Massage Therapy Alliance Association.
- (f) A criminal record check including the vulnerable sector search.
- (g) English language fluency.
- (h) Obtain and maintain a minimal \$2,000,000 liability and malpractice insurance.
- (i) Completing prescribed forms and submission of fees.

To remain in good standing and for renewal of membership, a Member must remit all prescribes forms/fees and maintain all continuing competency requirements as determined by the Board.”

If you compare CMMOTA’s requirements with the requirements of NHPC – whose bylaw documentation can be found at the following website:

<https://www.nhpcanada.org/files/nhpc-bylaws.pdf>

It states on page 5 under Section 2.3 the following:

“2.3 REGULAR MEMBER

2.3.1 An individual who has, at the time of new membership, throughout the term of membership, or at the application of renewal:

2.3.1.1 Achieved a certificate of completion from a program of natural health practice recognized by the NHPCA Board or the equivalent level of education, as determined by the Board of Directors;

2.3.1.2 Demonstrated English language proficiency as required by the Registrar from time to time;

2.3.1.3 A professional practice and is licensed in a jurisdiction where required to practice his or her discipline (field of study);

2.3.1.4 Been approved for membership by the Registrar;

2.3.1.5 Paid the applicable dues, special assessments, and professional liability program fees;



2.3.1.6 Read and signed an agreement to comply with the NHPCA Code of Ethics and to post a copy of the NHPCA Code of Ethics in his or her place of business that is visible to clients;

2.3.1.7 Fulfilled their continued competency requirement;

2.3.1.8 If required by the Registrar, submit evidence of having good character and reputation by providing copies of any of the following upon the request of the NHPCA:

2.3.1.8.1 Written references from colleagues (colleagues may not be family or relatives);

2.3.1.8.2 A statement as to whether the individual is currently undergoing an unprofessional conduct process or has been previously disciplined by a professional regulatory body or any professional association or body to which the individual belongs;

2.3.1.8.3 A statement as to whether the individual has ever been convicted of a criminal offence; and

2.3.1.8.4 Any other specific information as requested by the NHPCA”

As you can see, in terms of membership requirements when compared to the other two associations which have been written into the bylaw already, we are equivalent. We require the same number of hours of post secondary training, we require First Aid and CPR training, we require ongoing criminal record checks, including vulnerable sector checks, we require insurance to be carried by each of our therapists. So, in terms of membership requirements we are equivalent.

The second reason that we are equivalent, surrounds the very reason that you are putting this bylaw into place, which is to distinguish those who are practicing Therapeutic massage, from those who are practicing illicit body rub services.

Under CMMOTA’s RMT Scope of Practice document (link attached below¹) it says on page 6:

“Summary of Restricted Activities

This scope of practice restricts CMMOTA Massage Therapy members from performing the following activities: ...

7. Inserting body parts or equipment into the anus, vagina or urethra and massage of the penis or testicles.



8. Initiation or pursuit of personal romantic relationship(s) with client(s) within six months of the last treatment with the RMT.”

It further goes on to state the following on page 7 of the same document:

“Restricted Activities

The Registered Massage Therapist shall not:

1. Refer to themselves as any other protected title under any Health Professions Act;
2. Encourage, initiate or maintain a sexually intimate relationship with an existing client; except when legally married or in a common law relationship;
3. Encourage, initiate or maintain behavior of non-therapeutic nature;
4. Misrepresent their qualifications to members of the public.”

The members of the Canadian Massage and Manual Osteopathic Therapists Association are all required to abide by both the Scope of Practice¹ and Standard of Practice² documents, which again clearly define that we are not the type of therapist that the Body Rub Establishment zoning is meant for. Any member who practices outside of these Scope of Practice and Standard of Practice documents would be eligible for discipline, up to and including having their membership status revoked, upon the findings of an investigation made into a complaint filed against a member.

Again, what I am here to ask council to do tonight based on the information that I have presented , is to introduce an amendment to the Bylaw to include the Canadian Massage and Manual Osteopathic Therapists Association (CMMOTA) as an additional Association through whom credentials for Therapeutic massage will be required to be maintained.

With the information that I have now presented, I would be happy to answer any questions that the Council may have for me.

¹<https://cmmota.com/wp-content/uploads/2019/12/CMMOTA-RMT-Scope-of-Practice-October-2019.pdf>

²<https://cmmota.com/wp-content/uploads/2019/12/CMMOTA-RMT-Standards-of-Practice-October-2019.pdf>

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