



June 9, 2020

Mr. Mike Kennealy, Secretary
Massachusetts Executive Office of Housing and Economic Development
One Ashburton Place, Room 2101
Boston, Massachusetts 02108

Ms. Monica Bharel, Commissioner
Massachusetts Department of Public Health
250 Washington Street
Boston, Massachusetts 02108

RE: Updating Sector Specific Guidance – Close Contact Personal Services

Dear Secretary Kennealy and Commissioner Bharel:

On behalf of the approximately 3,000 members of the Massachusetts Chapter of the American Massage Therapy Association (“AMTA-MA”), I write to respectfully request two specific changes to the Sector Specific Guidance for Close Contact Personal Services. While the AMTA-MA appreciates the Baker-Polito Administration’s commitment to institute standards that balance public health with practicality, the recommended changes below will further improve public health and accountability.

As you know, the AMTA-MA’s earlier communication with your offices asked that your agencies adopt the standards for massage therapy created by the national organization, the Federation of State Massage Therapy Boards (“FSMTB”), which is comprised of representatives from state government and state massage therapy boards from across the country. The FSMTB guidance document ([Link](#)), which incorporated input from state regulators, national professional associations and public health experts, provides a reasonable outline for practicing massage therapy in light of COVID-19. Specifically, the FSMTB addressed the following two issues which should be reflected in the Commonwealth’s Sector Specific Guidance for Close Contact Personal Services:

- **Personal Protective Equipment (“PPE”): Requiring the Use of Gloves Where Appropriate.** As currently written, the Commonwealth’s Sector Specific Guidance for Close Contract Personal Services requires “glove changes and handwashing before and after each customer.” As stated by the FSMTB in its aforementioned guidance document, however, “[i]n response to COVID-19, [g]loves are worn to handle potentially contaminated linens and when discontinuous skin, blood, or body fluid is present.”. The FSMTB does not recommend conducting massages with gloves. Massage therapists, much like other health care professionals, are taught from their first day in a massage therapy training program to thoroughly wash their hands and arms, past the elbow, before and after every client contact. It is, in fact, the legal standard of care for the profession. Moreover, with PPE in short supply and the use of gloves likely a priority for first responders and hospital-based providers, the AMTA-MA respectfully urges you to amend the Sector Specific Guidance for Close Contact Personal Services accordingly. (See Connecticut: “[g]loves are optional depending on industry; if used must be changed between customer” ([Link](#)); see also Vermont (no mandated glove requirement)([Link](#)); Rhode Island (no mandated glove requirement)([Link](#))).

- **Client In-Take Processes and Procedures.** The most important element to preventing the potential spread of COVID-19 will be the client in-take processes and procedures. To this end, the AMTA-MA respectfully urges your agencies to amend the Sector Specific Guidance for Close Contact Personal Services to reflect, as a recommended best management practice, the asking of a series of COVID-19 related questions. This action will protect the massage therapist, the specific client and other potential clients. As outlined by the FSMTB, the questions should address:

- Have you been asked to self-isolate or quarantine by a doctor or a local public health official in the last 14 days?
- Have you experienced any cold or flu-like symptoms in the last 14 days (fever, cough, shortness of breath or other respiratory problem)?
- Have you had close contact with or cared for someone diagnosed with COVID-19, or someone exhibiting cold or flu-like symptoms within the last 14 days?
- Have you been tested for COVID-19? What type of test did you have? When were you tested? What was the result?

At a minimum, please amend the guidance document to include a recommended best management practice that suggests a practitioner ask if a potential client has had, or been exposed to someone who has had, COVID-19. Amending the Close Contact Personal Services Guidance in the aforementioned manner will further mitigate the spread the of COVID-19.

The AMTA-MA appreciates the work your agencies have put into making sure that the massage profession can return to work. The recommendations above will not just help to mitigate the potential spread of COVID-19; they will improve the practice of massage therapy in the Commonwealth. On behalf of the approximately 3,000 massage therapists of the AMTA-MA, thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Nichole Cross
President

Cc:

Ms. Layla D'Emilia, Commissioner
Massachusetts Division of Professional Licensure