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To: [ST, RegulatoryCounsel](#)
Subject: [External] Comments regarding rulemaking 16A-4518
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I found the proposal to be reasonable and cover all the the required bases except for one primary concern. The requirement of 120 square feet is onerous and not really a true requirement for the safe and effective application of massage therapy. I understand the logic of including a requirement based on the idea that salon owners might think a 60 square foot size, as required for others in the salon, might be reasonable for massage. However, I don't think the average salon owner is so devoid of business acumen that they would build a massage room without at least consulting with a massage therapist.

My opinion is based on my 42 years of practice as a massage therapist. I can only recall one instance where my office was that size. The vast majority of offices I worked in were smaller than that.

As I recall this size was determined based on the following.

1. The need to store linens in the room. Storage of linens can be outside if the room.
2. The need for a chair in the room. A small stool is all that is needed for client comfort will preparing to receive the massage and dressing afterwards.
3. The idea that all massage therapists include stretching the arms at a 90° angle from the shoulder. Not all massage includes stretching.
4. The concept that a table must be placed in a room parallel the the longest wall. A massage can be done effectively with the massage table placed diagonally in the room.

My fear is that this portion of the proposed regulation would effectively prevent many salons from hiring or retaining massage therapist. What about the salon owners who welcomed massage as soon as it was permitted. They probably built rooms in 2014 that were smaller than 120 square feet. They would have to remodel again?

What about massage therapists who have built a practice in a salon in a smaller room with no room in the salon to expand the room beyond it's current size. They would be out of of business by the regulation because it is started that all existing massage rooms would need to comply.

It would be a shame if after the many years of working to change the regulations to allow massage therapist to practice legally in a salon the final regulations would basically prohibit their work in many existing salons.

I would suggest the wording be eliminated completely regarding room size or at a minimum changed from:

- (A) The size of the separate massage therapy room must be a minimum of 120 square feet.

To something like:

(A) The size of the separate massage therapy room must provide for the safe and effective application of massage therapy allowing for freedom of movement around the perimeter of a standard size massage table. As a guideline 120 square feet is suggested.

This wording would not effectively put many people out of business as the proposed regulation might do. I do not believe the basic premise stated that very few massage therapists working in salons are working in rooms smaller than 120 square feet. I would guess that many, if not most, are working in smaller rooms.

Remember, when licensing was first proposed for massage therapists we were required to include liberal grandfathering provisions to allow as many massage therapists as possible to continue to practice. Shouldn't the same consideration be given when developing regulations.

As a final thought, when we were developing the regulations for massage therapists there was no thought of trying to regulation the size of massage rooms in a massage practice. What makes it so important to regulate it in a salon and what's to prohibit an overzealous board in the future to include regulations determining the size of treatment rooms in the massage regulations. After all, if that is required in cosmetology it's only a short jump to seeing if as being required in the massage regulations.

As I said I have been practicing for 42 years. I am a former massage school owner. Also, I was the first chairperson of the Pennsylvania Board of Massage Therapy and a heavily involved in promulgating the regulations that are in force to this day.

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