

INSPECTIONS AND APPEALS DEPARTMENT[481]

Regulatory Analysis

Notice of Intended Action to be published: 481—Chapter 821
“Licensure of Massage Therapists”

Iowa Code section(s) or chapter(s) authorizing rulemaking: 147, 152C and 272C
State or federal law(s) implemented by the rulemaking: Iowa Code chapters 147, 152C and 272C

Public Hearing

A public hearing at which persons may present their views orally or in writing will be held as follows:

September 8, 2026
2 p.m.

6200 Park Avenue
Des Moines, Iowa

Public Comment

Any interested person may submit written or oral comments concerning this Regulatory Analysis, which must be received by the Board of Massage Therapy no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

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Des Moines, Iowa 50321
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Purpose and Summary

This proposed rulemaking updates the Board’s rules regarding reactivation and foreign-trained graduates. This rulemaking allows the Board to issue a massage therapy license to a foreign-trained graduate who has completed an equivalency evaluation at an approved agency, eliminates outdated agency information in the current rule, and clarifies and simplifies the rules for reactivation of a massage therapy license. New rules allow the applicant whose license has been inactive for over five years to verify active practice and 16 hours of continuing education, complete 32 hours of continuing education, or retake the examination. This provides additional pathways to reactivation rather than just the examination.

Analysis of Impact

1. Persons affected by the proposed rulemaking:

• **Classes of persons that will bear the costs of the proposed rulemaking:**

There are no anticipated costs to this rulemaking other than the costs already incurred by the Board to enforce the rules. Massage therapists will incur costs in licensing fees to obtain this license.

• **Classes of persons that will benefit from the proposed rulemaking:**

This rulemaking allows an additional pathway for massage therapists to reactivate their license without retaking an examination.

2. Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:

- **Quantitative description of impact:**

Members of the public would incur no costs other than payment for massage services provided. Massage therapists will be responsible for meeting licensure requirements.

- **Qualitative description of impact:**

The Board believes that the costs are justified by the benefits achieved because the rules allow additional pathways to reactivation of a massage therapy license.

3. **Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

Costs to the agency are for the staff time needed to manage Board activities, which include oversight of practice standards and requirements. The Board would still need to review and approve applications for massage therapists; however, the Board does not anticipate any further costs than are already incurred. The time needed to manage this provision is generally in the form of responding to questions related to practice standards and processing requests for review of training. Staff salaries to support the work of the Board are covered by the Licensing and Regulation Fund established in 2023 Iowa Acts, Senate File 557.

- **Anticipated effect on State revenues:**

This rulemaking has no anticipated impact on State revenues. Staff salaries to support the work of the Board are covered by the fund. Licensing fees go to the fund to cover the operations of the regulated professional licensing boards.

4. **Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans. Licensure requirements could be reduced or eliminated for the purpose of lowering the bar of entry into the profession, but the Board would be concerned about the public safety of Iowans in that scenario. In addition, the rulemaking provides consistency related to the licensure of massage therapists in other states, which makes obtaining licensure in multiple states simpler for applicants.

5. **Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

The Board has not identified a more cost-effective alternative to the licensure of massage therapists. The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans.

6. **Alternative methods considered by the agency:**

- **Description of any alternative methods that were seriously considered by the agency:**

The Board has not identified a more cost-effective alternative to the licensure of massage therapists. The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans.

- **Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

The Board has not identified a more cost-effective alternative to the licensure of massage therapists. The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans.

Small Business Impact

If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:

- Establish less stringent compliance or reporting requirements in the rulemaking for small business.

- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.
- Consolidate or simplify the rulemaking's compliance or reporting requirements for small business.
- Establish performance standards to replace design or operational standards in the rulemaking for small business.
- Exempt small business from any or all requirements of the rulemaking.

If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?

The proposed amendments relate to public safety concerns that are present whether the business is a small business or a large corporation. While some massage professionals may work in a smaller office, some work for larger establishments. To exempt a small business from adhering to this rulemaking would jeopardize any member of the public who sought services from that small business. The risk to the public is greater than the potential harm or cost to the small business.

Text of Proposed Rulemaking

ITEM 1. Amend subrule 821.3(1) as follows:

821.3(1) Provide an equivalency evaluation of their educational credentials by ~~one of the following entities~~ a board-approved agency, demonstrating the curriculum is equivalent to that stated in these rules. The applicant bears the expense of the curriculum evaluation.

~~a. International Education Research Foundation, Inc., Credentials Evaluation Service, P.O. Box 3665, Culver City, CA 90231-3665; telephone 310.258.9451; website www.ierf.org.~~

~~b. International Credentialing Associates, Inc., 7245 Bryan Dairy Road, Bryan Dairy Business Park II, Largo, FL 33777; telephone 727.549.8555.~~

~~c. Josef Silny & Associates, Inc., 7101 SW 102nd Avenue, Miami, FL 33173; telephone 305.273.1616; website jsilny.org.~~

ITEM 2. Rescind subrule 821.9(2) and adopt the following new subrule in lieu thereof:

821.9(2) The licensee shall submit all of the following:

a. A completed online application for licensure and the nonrefundable licensure fee specified in rule 481—507.8(147).

b. If licensed in another state, verification of the license from the jurisdiction in which the applicant has most recently been practicing during the time period the Iowa license was inactive, sent directly from the jurisdiction to the board office. Web-based verification may be substituted for verification from a jurisdiction's board office if the verification includes:

- (1) Licensee's name;
- (2) Date of initial licensure;
- (3) Current licensure status; and
- (4) Any disciplinary action taken against the license.

c. If the license has been inactive for five years or less, proof of completion of 16 hours of continuing education within two years of application.

d. If the license has been on inactive status for more than five years:

(1) Proof of completion of 16 hours of continuing education within two years of application and proof of two years of active, licensed practice in another issuing jurisdiction immediately prior to submitting the application;

(2) Proof of completion of 32 hours of continuing education to include 16 hours of in-person, clinical training; or

(3) Proof of passing one of the following examinations within two years of submitting the application:

1. The National Certification Examination for Therapeutic Massage (NCETM);

2. The National Certification Examination for Therapeutic Massage and Bodywork (NCETMB);
3. The National Examination for States Licensing (NESL) option; or
4. The Massage and Bodywork Licensing Examination (MBLEx).