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OFFICE OF THE PUBLIC DEFENDER

**STATE OF HAWAII**  
**DEPARTMENT OF BUDGET AND FINANCE**  
P.O. BOX 150  
HONOLULU, HAWAII 96810-0150

ADMINISTRATIVE AND RESEARCH OFFICE  
BUDGET, PROGRAM PLANNING AND  
MANAGEMENT DIVISION  
FINANCIAL ADMINISTRATION DIVISION  
OFFICE OF FEDERAL AWARDS MANAGEMENT (OFAM)

**WRITTEN ONLY**  
TESTIMONY BY WESLEY K. MACHIDA  
DIRECTOR, DEPARTMENT OF BUDGET AND FINANCE  
TO THE HOUSE COMMITTEE ON EDUCATION  
ON  
SENATE BILL NO. 1286, S.D. 2

**March 15, 2017**  
**2:02 p.m.**  
**Room 309**

**RELATING TO PRIVATE TRADE, VOCATIONAL, AND TECHNICAL SCHOOLS**

Senate Bill No. 1286, S.D. 2, amends Chapter 302A, HRS, and requires the Department of Education (DOE) to license private trade, vocational, and technical schools, as necessary, for compliance with federal regulations and accreditation requirements. The purpose of the measure is to clarify the scope of the licensure program and to establish a licensing fee to ensure its sustainability.

The measure also establishes the Private Trade, Vocational, and Technical School Licensure Special Fund. The measure authorizes the deposits of revenues and fees established by the bill and general fund appropriations into the special fund. However, the bill leaves the amount of the initial license fee and renewal fee unspecified. In addition, the bill authorizes the deposit of an unspecified amount of general funds into the special fund for FY 18 and FY 19. Moneys in the special fund are to be used to fund activities related to licensure requirements, including permanent staff positions. The bill also authorizes the establishment of one full-time equivalent position within DOE to be funded out of the special fund for FY 18 and FY 19.

The Department of Budget and Finance, as a matter of general policy, does not support the creation of any special fund which does not meet the requirements of Section 37-52.3 of the HRS. Special funds should: 1) serve a need that cannot be implemented under the general fund appropriation process; 2) reflect a clear nexus between the benefits sought and charges made upon the users or beneficiaries of the program; 3) provide an appropriate means of financing for the program or activity; and 4) demonstrate the capacity to be financially self-sustaining. In regards to Senate Bill No. 1286, S.D. 2, it is uncertain if the special fund will be self-sustaining.

Thank you for your consideration of our comments.



**LATE**

STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

**Date:** 03/15/2017  
**Time:** 02:02 PM  
**Location:** 309  
**Committee:** House Education

**Department:** Education

**Person Testifying:** Kathryn S. Matayoshi, Superintendent of Education

**Title of Bill:** SB 1286, SD2 RELATING TO PRIVATE TRADE, VOCATIONAL, AND TECHNICAL SCHOOLS.

**Purpose of Bill:** Clarifies the scope of the private trade, vocational, and technical school licensure program within the department of education. Establishes a licensing fee to ensure the sustainability of the licensure program. Establishes a license renewal process and fee. Creates the private trade, vocational, and technical school licensure special fund. Appropriates moneys for one full-time equivalent position within the department of education to administer licensing. Effective 07/01/2050. (SD2)

**Department's Position:**

The Department of Education supports SB 1286 SD2 relating to private trade, vocational and technical schools.

Private Trade, Vocational or Technical (PTVT) administration by the Department continues to take away valuable resources and time that should be solely focused on providing direct services and supports for Hawaii public schools, educators and students.

With a special fund and dedicated position to support the PTVT licensing program operations, the Department will be better able to provide for the licensure program's sustainability.

The operational support provided in this measure will allow the Department to continue to administer licensing for PTVT schools while continuing to focus on the Department's primary mission. Our primary mission is focused on K-12 education to ensure that all public school students can reach their fullest potential and attain their aspirations in the 21st century.

Thank you for this opportunity to provide testimony on SB 1286 SD2.

## EDNtestimony

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, March 14, 2017 10:10 AM  
**To:** EDNtestimony  
**Cc:** carmel@mahamaui.com  
**Subject:** Submitted testimony for SB1286 on Mar 15, 2017 14:02PM

### **SB1286**

Submitted on: 3/14/2017

Testimony for EDN on Mar 15, 2017 14:02PM in Conference Room 309

Submitted By	Organization	Testifier Position	Present at Hearing
Carmel Andrews	Maui Academy of Healing Arts	Support	No

Comments: Rep Roy Takumi, Chair Rep Sharon Har, Vice-Chair Carmel Andrews LMT, Principal Maui Academy of Healing Arts Support for SB 1286 SD2, Relating to the Licensing of Private Trade, Vocational, and Technical Schools Honorable Chairpersons and Members of the EDN Committee: I support the general intent and most details of SB1286 SD2. I have four comments: 1. Section 3.2(7): I am concerned that adding "or authorized" here could be construed to suggest that a non-accredited school such as ours would not be considered a vocational school as a result of submitting the letter from the Board of Massage according to section 4(b)(1)). Please edit this if you agree that this language could be construed in such a way. 2. Section 4(b)(1): I request a language revision that conveys that designation as an "assigned school" by the National Certification Board of Therapeutic Massage and Bodywork (NCBTMB) would count as "accreditation". For more info on NCBTMB see <http://www.ncbtmb.org/schools/assigned-schools>. I suggest this language: Proof that the school is accredited by an accrediting commission of career schools and colleges, accrediting or certifying council for continuing education and training, or an accrediting or certifying bureau of health education schools; provided that in lieu of such accreditation or certification... 3. Section 4(c) & 4(d): I support raising the application fees above the current rates of \$100/\$50, but given that the DOE's responsibilities are significantly lessening, fee amounts closer to \$100/\$50 than to \$10,000 (suggested in the bill's original version) seem more appropriate. 4. Section 13: I support an effective date before June 30, 2017 so that the DOE is not burdened with vetting vocational school curriculum in July and August of 2017 and so that it aligns with the bill's designation of funds for 2017-2019. If it becomes effective between June 30, 2017 and August 31, 2017, the new person would be working with applications that don't align with Section 4(b), and if this becomes effective after the August 31, 2017, then those funds will be allocated to a person with no applications to review until July 2019. Thank you for your time and efforts with this bill.

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

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Rep Roy Takumi, Chair  
Rep Sharon Har, Vice-Chair

Dr. Mark Olson, Director, Pacific Center for Awareness and Bodywork

Wednesday, March 13, 2017, 2:00pm

Support for SB 1286 SD2, Relating to the Licensing of Private Trade, Vocational, and Technical Schools

Honorable Chairpersons and Members of the EDN Committee:

**I support the general intent and most details of SB1286 SD2.** I have four comments:

1. **Section 3.2(7):** I am concerned that **adding “or authorized” here could be construed to suggest that a non-accredited school** such as ours **would not be considered a vocational school as a result of submitting the letter** from the Board of Massage according to section 4(b)(1)). Please edit this if you agree that this language could be construed in such a way.
2. **Section 4(b)(1): I request a language revision** that conveys that designation as an “assigned school” by the **National Certification Board of Therapeutic Massage and Bodywork (NCBTMB) would count as “accreditation”**. For more info on NCBTMB see <http://www.ncbtmb.org/schools/assigned-schools>. I suggest this language:

Proof that the school is accredited by an accrediting commission of career schools and colleges, accrediting or certifying council for continuing education and training, or an accrediting or certifying bureau of health education schools; provided that in lieu of such accreditation or certification...

3. **Section 4(c) & 4(d): I support raising the application fees** above the current rates of \$100/\$50, but given that the DOE’s responsibilities are significantly lessening, fee amounts **closer to \$100/\$50 than to \$10,000** (suggested in the bill’s original version) seem more appropriate.
4. **Section 13: I support an effective date before June 30, 2017** so that the DOE is not burdened with vetting vocational school curriculum in July and August of 2017 and so that it aligns with the bill’s designation of funds for 2017-2019. If it becomes effective between June 30, 2017 and August 31, 2017, the new person would be working with applications that don’t align with Section 4(b), and if this becomes effective after the August 31, 2017, then those funds will be allocated to a person with no applications to review until July 2019.

Thank you for your time and efforts with this bill.

Mark Olson, Ph.D.  
Director, Pacific Center for Awareness and Bodywork  
PO Box 1049, Kilauea, HI 96754

## EDNtestimony

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, March 14, 2017 2:00 PM  
**To:** EDNtestimony  
**Cc:** markolson68@gmail.com  
**Subject:** Submitted testimony for SB1286 on Mar 15, 2017 14:02PM

### **SB1286**

Submitted on: 3/14/2017

Testimony for EDN on Mar 15, 2017 14:02PM in Conference Room 309

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Dr. Mark Olson	Pacific Center for Awareness and Bodywork	Comments Only	No

Comments: This comment is in addition to the letter I previously submitted. I would like to point out an important remaining problem with this bill that's easy to fix. Section 4a states that the purpose of DOE licensing is "necessary for compliance with federal regulations and accreditation requirements" but this phrase leaves out the PRIMARY and universally shared reason why our schools need a DOE license. When our graduates apply for a massage license in other states, they need to submit proof that the school they attended was licensed by the DOE. This has nothing to do with federal requirements or accreditation. The text should read "accreditation or licensing requirements".

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## EDNtestimony

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, March 14, 2017 6:09 PM  
**To:** EDNtestimony  
**Cc:** markolson68@gmail.com  
**Subject:** Submitted testimony for SB1286 on Mar 15, 2017 14:02PM

### **SB1286**

Submitted on: 3/14/2017

Testimony for EDN on Mar 15, 2017 14:02PM in Conference Room 309

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Dr. Mark Olson	Pacific Center for Awareness and Bodywork	Comments Only	No

Comments: In my testimony letter, I wrote that I supported an effective date before June 30, 2017. However, the best way to ensure that massage schools are properly vetted is to require them to attain NCBTMB assigned school status and to remove the option in section 4b that a letter from the Board of Massage would suffice. If the committee chose to adopt this better option, then the effective date would need to move to 2019 to give schools adequate time to get approved by NCBTMB.

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**LATE**

*Travel Institute*  
OF THE PACIFIC

March 14, 2017

To: COMMITTEE ON EDUCATION

THE TWENTY-NINETH LEGISLATURE  
REGULAR SESSION OF 2017

Rep. Roy M. Takumi, Chair  
Rep. Sharon E. Har, Vice Chair

Testimony RE: Senate Bill 1286  
Relating to the Licensing of Private Trade, Vocational and Technical Schools

Honorable Chairperson and Members of these Committees:

My name is Frank Green, President of the Travel Institute of the Pacific and the Gros Bonnet Culinary Academy. Founded in 1973, we are a Private Postsecondary School licensed by the Department of Education, State of Hawaii, nationally accredited by the Accrediting Commission of Career Schools and Colleges, approved for the acceptance of Veteran Benefits, certified by the Federal Department of Education to administer Title IV Federal Financial Aid programs, and approved to enroll international students through the issuance of I-20 Student Visas.

I am opposed to SB1286 in its entirety.

The Department of Education has efficiently reviewed and licensed private postsecondary schools for as far back as I can remember. They DOE has handled this task efficiently and has worked with the legislature and schools over the years to establish an effective set of guidelines and procedures that work! The current licensing requirements have kept the bureaucracy at a minimum while insuring protection for the students. The expertise to administer the licensing of vocational schools is clearly with the Department of Education.

This bill is rife with problems and does nothing but create a new level of costly bureaucracy. I am asking the Legislature to leave this process as is and where it belongs, with the Department of Education.

I oppose the removal of Non-Accredited Schools from Private Trade, Vocational and Technical School licensure by the Department of Education. State licensure is a stepping stone towards National Accreditation and in most cases a requirement. Without a license these schools would not be able to achieve accreditation. The bill would create a restrictive monopoly for established accredited schools and the community colleges. Without the current oversight regarding curriculum, financial stability, adequate facilities, health, fire and building departments approvals, experienced and qualified teachers we place our students at risk. Anyone would be able to open a shop, call it a 'school', enroll students, collect tuition, and then disappear. We cannot allow our students to fall victim to potential fraud.



*Travel Institute*  
OF THE PACIFIC

The proposed fee of \$10,000 is unconscionable. A fee at this level would put an unreasonable burden on the schools covered by this bill, and would most likely put several schools out of business. None of us have large student bodies, in most case less than one hundred students. To be hit with an increase from the current \$50.00 to \$10,000 is ridiculous. Those schools who would remain would inevitably pass this on to the students in the form of a tuition increase – the burden then falling to those who can least afford it. Additionally, I don't believe that the collection of this fee would prove sufficient to cover the addition cost created by this bill, resulting in additional state funds being allocated – can we afford, and should the taxpayers be stuck with this expense? To accomplish what?

I urge you to not 'fix' what is not broken, and please defeat this bill.

Sincerely,

*Frank Green*

Frank Green  
President  
Travel Institute of the Pacific  
Gros Bonnet Culinary Academy  
[green@tiphawaii.com](mailto:green@tiphawaii.com)  
808-591-2708

**LATE**

## MARITIME LICENSE CENTER SENATE BILL 1286 & HOUSE BILL 494 TESTIMONY

### MARITIME LICENSE CENTER INFORMATION

The Maritime License Center provides maritime courses to the Hawaii maritime industry which includes:

- The Hawaii Maritime Tourist Industry - Dive vessels, Whale Watch vessels, Dinner Cruise vessels, Parasail vessels, etc.
- The Hawaii Tug Boat Industry - Hawaiian Tug & Barge, Sause Brothers, American Marine, P & R Water Taxi, P&M Towing Services, Young Brothers, Sea Engineering, Kirby Offshore.
- The "Big Ship Industry" - Matson, Horizon, Pasha, Norwegian Cruise Lines.
- The Maritime Unions – Seafarer’s International Union, Sailors Union of the Pacific, Marine Fireman Oilers & Wipers Union, Inland Boatman’s Union, Master Mates & Pilots Union, Marine Engineers Beneficial Association.

For the above Maritime Industry, the Maritime License Center offers over 24 different programs/courses required by the International Maritime Organization (IMO) and the U.S. Coast Guard for mariners to obtain and maintain their licenses. These programs and courses are listed below:

#### Programs

\* Indicates Coast Guard approved

- Master/mate 500 Tons Program \*
- Master/mate 200 Tons Inland & Near Coastal Program \*
- Master/mate 200 Tons Steersman of Towing Vessels Program \*
- Master/mate 100 Tons Inland & Near Coastal Program \*
- Operator, Uninspected Passenger Vessels Program (6-pak) \*
- Able Seafarer (Seaman) Program \*

## Courses

- Master/Mate 200 Tons Inland & Near Coastal \*
- Master/Mate 200 Tons (Oceans) \*
- Master/Mate 200 Tons (Steersman) of Towing Vessels \*
- Master/Mate 200 Tons \*
- Operator of the Uninspected Passenger Vessel (OUPV) \*
- Radar Observer \*
- Radar Recertification \*
- Auxiliary Sail Endorsement \*
- Assistance Towing Endorsement \*
- Able Seaman (Seafarer) \*
- Proficiency In Survival Craft \*
- Marine Radio Operator Permit (FCC approved course)
- First Aid /CPR \*
- STCW Basic Safety \* (Basic Firefighting/Personal Survival/Personal Safety, (four modules) Social Responsibilities/First Aid-CPR)
- Bridge Resource Management (Bridge Team Procedures) \*
- Celestial Navigation for Ocean Voyages
- Qualified Member of the Engineering Department (QMED)\*
- Visual Communications\*
- Medical Care Provider\*
- Fishing Vessel Safety Drill Coordinator\*
- Automatic Radar Plotting Aids\*
- Global Maritime Distress & Safety System (GMDSS)\*
- Ratings Forming Part of a Navigational Watch (RFPNW-Lookout duties)\*
- Security Awareness Training for All Mariners\*
- Security Training for Mariners with Designated Security Duties\*
- Fishing Vessel Safety Drill Coordinator \*
- Leadership & Managerial Skills \*
- Leadership & Teamworking Skills \*

Notice all programs and courses have been approved by the U.S. Coast Guard National Maritime Center. The U.S. Coast Guard does not approve schools, but only approves courses.

The Maritime License Center has been approved to receive Workforce Investment Act (WIA) funds and Post 9/11 GI Bill, Veterans Administration funds.

In order to receive these funds, the Maritime Licensed Center had to show that it was licensed by the state.

## SENATE BILL 1286 & HOUSE BILL 494 CONCERNS

- State Licensure:

The Maritime License Center must be State licensed in order to continue to collect funds from the VA, Workforce Investment Act (WIA), Hana Lima and the Office of Hawaiian Affairs (OHA) and other government/private agencies.

- Section 302A-425 (b) (1)

Proof that the school is accredited by ---- etc.

There is no accrediting agency for maritime courses. All of the Maritime License Center courses have been approved by the U.S. Coast Guard National Maritime Center (USCGNMC). The USCGNMC does not approve or accredit schools, only courses.

The above referenced paragraph needs include courses that have been approved by U.S. Government agencies and should be modified as follows:

“Proof that the school, or its courses, are approved or accredited by an accrediting commission of career schools and colleges, accrediting council for continuing education and training, an accrediting bureau of health education schools, or other U.S. Government agency, provided that in lieu -----etc.”

- Licensure Special Fund

The DOE responsibilities has been decreased tremendously. Under the new bill the DOE no longer has to approve:

- the method and content of advertising
- the standards and methods of instruction
- the equipment provided
- adopt reasonable rules relating to the enforcement of the above

The only responsibility that the DOE is left with is to accept the application package which includes:

- 1. Accrediting/course approval by an approved agency
- 2. Proof of current business registration demonstrating good standing
- 2. Copy of the schools current general excise tax license and clearance
- 3. Proof of a \$50,000 security bond

and then issue the license. Licensure Special Fund

Ninety percent of the work that they have been doing under the old bill has been eliminated and yet they want to establish a that will be funded by both the general revenue of the State of Hawaii and licensure fees from schools. This fund will be used to establish a full time position to do a fraction of what they were responsible for doing under the old bill.

I agree that the \$50 licensure fee currently being charged to schools is probably not enough and should be raised to reasonable rate (less than \$500) to cover the review of the application package and the issue of the license.

#### RECOMMENDATIONS

- Modify Section 302A-425 (b) (1) to include Accreditation/Course Approval by any government agency.
- Eliminate the Licensure Special Fund, which is funded by both the General Revenue of the State of Hawaii and licensure fees from schools.
- Change the licensure fees from \$50 to somewhere between \$100 and \$500.



***Maui School of Therapeutic Massage***  
***P.O. Box 1891, Makawao, HI 96768***  
***(808) 572-1888***

*Admissions: 808-572-1888 ♦ Clinic: 808-572-2277 ♦ Fax: 808-572-2274*  
*www.massagemau.com ♦ info@massagemau.com*

**LATE**

**Honorable Rep. Roy Takumi, Chair; Honorable Rep. Sharon Har, Vice-Chair; and  
Honorable Members of the Committee:**

I am writing as the Director of the Maui School of Therapeutic Massage (MSTM), a Department of Education (DOE)-licensed vocational school since 1995. I am in support of the spirit of SB1286 (draft 2), in particular that funding has been set aside for a dedicated position in the DOE for vocational school licensing.

However, there are some specific aspects of the wording of the bill which may have a deleterious effect on vocational schools. Specifically, Section 4(a), lines 16-18 (p.6) states that "the department shall license private trade, vocational, and technical schools as necessary for compliance with federal regulation and accreditation requirements." This wording is not inclusive of other critically important reasons for which a vocational school may need a license. In addition to being a requirement for accreditation, and a requirement for participation in various federal programs such as SEVP (Student and Exchange Visitor Program through Department of Homeland Security), vocational school licensure is also necessary, in our case, for our graduates to be able to achieve professional licensure in other states. A basic requirement for massage therapy licensure in most states (including Hawaii), is that an applicant receive their training at a state-licensed or state-approved school. Without our vocational school license, our graduates would not be able to seek licensure in most states outside of Hawaii. Prospective out-of-school students would not choose to train at a school from which they cannot use their education to achieve licensure. This could effectively put MSTM and other small massage therapy schools out of business, depriving the profession of the high quality massage therapy training, and depriving the State of Hawaii of the highly trained massage therapists, upholding high ethical and professional standards, who would come through our schools. I want to underscore that vocational schools have a need for a vocational school license beyond federal and accreditation requirements.

My recommendation is to strike lines 16-18 from Section 4(a) (p.6) from the bill, so that schools with other needs for licensure, needs beyond federal and accreditation requirements, are not omitted from the pool of vocational schools eligible to become licensed.

I also have concerns that Section 4 (b) 1, lines 11-14 (p.7) are still in the bill, for the reason that it creates a recursive catch-22 and is seemingly not well thought out. As we explained in prior testimony to the Senate Committees, licensure is a requirement in order for a school to become accredited in the massage therapy profession. As it stands, only currently accredited schools (universities and large corporate schools from the mainland who could then move into the local vocational school education market) could use this clause. I do appreciate that another option has been included (lines 15-19) and that a letter from the Board affirming that a school's curriculum meets state licensing requirements would suffice for meeting vocational license requirements. However, the discrepancy between the standards between these two disparate options is huge; in our profession, the difference between a letter from the Board of Massage and accreditation would be analogous to choosing between (a) being qualified to drive a car vs. (b) being qualified to operate a high performance aircraft. (see attachments re: COMTA accreditation requirements).

I am also concerned for vocational schools which may not have a board which oversees their profession. From which Board would a school such as the Maritime Licensing Center, a vocational school critical to the maritime industry and economy of Hawaii, procure such a letter?

I think it would be beneficial for the professions and for the vocational schools if more thought were given to Section 4 (b) 1. Most professions have vocation-specific credentialing entities which determine education standards for their industry. For instance, the National Certification Board of Therapeutic Massage and Bodywork (NCBTMB) would be the appropriate entity for vocational schools training in the Massage Therapy profession. (See attached).

Thank you for the opportunity to provide testimony on SB1286. I will be present at the hearing and would be happy to answer any questions you may have.

Sincerely,

Shelagh Lampshire

Director

Maui School of Therapeutic Massage



To the Honorable Rep. Roy Takumi, Chair; Honorable Rep. Sharon Har, Vice-Chair; and Honorable Members of the Committee:

I am writing as the Director of Education at the Maui School of Therapeutic Massage (MSTM), a Department of Education (DOE)-licensed vocational school since 1995. I am in support of the spirit of SB1286 (draft 2), in particular that funding has been set aside for a dedicated position in the DOE for vocational school licensing.

However, there are some specific aspects of the wording of the bill which may have a deleterious effect on vocational schools. Specifically, Section 4(a), lines 16-18 (p.6) states that "the department shall license private trade, vocational, and technical schools as necessary for compliance with federal regulation and accreditation requirements." This wording is not inclusive of other critically important reasons for which a vocational school may need a license. In addition to being a requirement for accreditation, and a requirement for participation in various federal programs such as SEVP (Student and Exchange Visitor Program through Department of Homeland Security), vocational school licensure is also necessary, in our case, for our graduates to be able to achieve professional licensure in other states. A basic requirement for massage therapy licensure in most states (including Hawaii), is that an applicant receive their training at a state-licensed or state-approved school. Without our vocational school license, our graduates would not be able to seek licensure in most states outside of Hawaii. Prospective out-of-school students would not choose to train at a school from which they cannot use their education to achieve licensure. This could effectively put MSTM and other small massage therapy schools out of business, depriving the profession of the high quality massage therapy training, and depriving the State of Hawaii of the highly trained massage therapists, upholding high ethical and professional standards, who would come through our schools. I want to underscore that vocational schools have a need for a vocational school license beyond federal and accreditation requirements.

Please strike lines 16-18 from Section 4(a) (p.6) from the bill, so that schools with other needs for licensure, needs beyond federal and accreditation requirements, are not omitted from the pool of vocational schools eligible to become licensed.

I also have concerns that Section 4 (b) 1, lines 11-14 (p.7) are still in the bill, for the reason that they are not well thought out. It puts us in a catch 22. Licensure is a requirement in order for a school to become accredited in the massage therapy profession. As it stands, only currently accredited schools (universities and large corporate schools from the mainland who could then move into the local vocational school education market) could use this clause. A more appropriate requirement for massage schools is approval from a vocation-specific credentialing entity which determines education standards for the industry. Specifically, the National Certification Board of Therapeutic Massage and Bodywork (NCBTMB) would be the appropriate entity for vocational schools training in the Massage Therapy profession. Thank you for the opportunity to provide testimony on SB1286.

Sincerely,

Frances Salvato

Director of Education

Maui School of Therapeutic Massage

## EDNtestimony

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, March 14, 2017 10:02 PM  
**To:** EDNtestimony  
**Cc:** raphiell@gmail.com  
**Subject:** Submitted testimony for SB1286 on Mar 15, 2017 14:02PM

### **SB1286**

Submitted on: 3/14/2017

Testimony for EDN on Mar 15, 2017 14:02PM in Conference Room 309

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Raphiell Nolin	Individual	Comments Only	No

Comments: I have been an instructor at the Maui school of therapeutic massage for more than 22 years. Over that time we have graduated thousands of students who have gone on to successful careers in Massage Therapy. The provisions in this bill would in fact shut down our school, as we would not be able to afford the fees required. I strongly oppose this bill in its present form.

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

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