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May 21, 2021

The Honorable Dick Stein, Chair  
House Commerce and Labor Committee  
Ohio State Legislature  
77 South High Street, 12th Floor  
Columbus, OH 43215

Re. HB 81 to revise laws governing massage establishments / massage therapy

Dear Chair Stein and members of the Committee:

I am writing on behalf of the United States *Trager*® Association (USTA) and in support of our 13 Certified *Trager* Practitioners in Ohio who may be adversely affected by HB 81 as currently written. The *Trager Approach*® is a method of movement education that helps people find greater ease and freedom as they move through daily life. We invite you to visit our website for more information: <http://www.tragerapproach.us>

The USTA does not oppose the intent of this bill to better regulate the massage therapy profession and curb illegal activities associated with illicit establishments. However, the very broad definition of massage therapy in the bill could be interpreted to include practitioners of The *Trager Approach* as massage therapists. This would be incorrect. The *Trager Approach* is not part of massage therapy and is not recognized as such by massage therapy programs. The *Trager Approach* is based on an educational model, not a therapeutic one, and we do not use the terms “massage” or “therapy” to describe or advertise our work. Because training in massage therapy is not relevant to or necessary for the practice of the *Trager Approach*, mandatory massage therapy licensing would place a burden of unnecessary training and expenses on our Practitioners. Our Practitioners love this work and are certainly not in it for the money – which is not a lot. This extra expense and loss of income would be no small matter for them. This would also be unfair restraint of our profession by discouraging prospective *Trager* trainees or Practitioners moving in from other states who may not be able or willing to undertake unnecessary massage therapy training to practice.

Moreover, professional state licensing for *Trager* Practitioners is not needed. There is no record of harm from the practice of the *Trager Approach* and there has never been a case of our Practitioners being involved in illegal activities in Ohio or any other state. Certified *Trager* Practitioners doing The *Trager Approach* are simply not a part of the problems this bill addresses, and imposing this on us would be regulatory overreaching.

We request the inclusion of suitable exemptions for non-massage practices based on those in place in most states that regulate massage therapy and supported by national AMTA policy and the Federation of Therapeutic Massage, Bodywork and Somatic Practices Organizations. ([federationmbs.org](http://federationmbs.org)) For movement-education based practices, such as The *Trager Approach*, Feldenkrais and Somatic Education we suggest the following amendment be placed in Sec. 4731.15 (F):

*(F) The following persons are not required to hold a license to practice massage therapy issued under this chapter:*

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*(5) A person who:*

*(a) uses touch, words, and directed movement to deepen awareness of existing patterns of movement as well as to suggest new possibilities of movement; provided that their services are not designated or implied to be massage or massage therapy.*

*(b) and is recognized by or meets the established standards of either a professional organization or credentialing body that represents or certifies the respective practice based on a minimum level of training, demonstration of competency, and adherence to ethical standards*

Exemptions using, or based on, this language are in place in most states that regulate massage therapy.

Thank you for your consideration. HB 81 is a significant bill dealing with many issues that may seem more important than this, but to our Practitioners this is indeed a big deal. Please feel free to call on me for any information or assistance I can give.

The USTA is the 501(c)(6) professional membership organization that trains and certifies practitioners of the *Trager* Approach in the U.S. We enforce the professional and educational standards, and code of ethics for Certified *Trager* Practitioners and serve the professional needs of our members. We also defend the right of our Practitioners to practice without inappropriate and burdensome regulation.

*Jim Noriega*  
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