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March 9, 2021

By email only to: shuffman@ohiosenate.gov

The Honorable Stephen A. Huffman, Chair
Senate Health Committee
Ohio State Legislature
1 Capitol Square
Columbus, OH 43215

Dear Chair Huffman, Vice Chair Antani, Ranking Member Antonio and members of the Senate Health Committee and members of the Committee:

I am writing on behalf of the International Association of Structural Integration (IASI) regarding SB 55, a bill to revise laws governing massage establishments and massage therapy. There are currently 14 Structural Integrators in Ohio, and SB 55 as currently written, may adversely affect their right to practice Structural Integration (SI).

IASI does not oppose this bill or its intent to better regulate the massage therapy profession. However, the broad definition of massage therapy in the bill could be interpreted to inappropriately include practitioners of Structural Integration as massage therapists.

Structural Integration is a process-based approach to somatic education, typically involving manual therapy, and body awareness education. It is based on the work developed by Dr. Ida Rolf, PhD., over several decades, who began teaching it in the late 1960s. Her PhD was in organic chemistry, she had no background in massage, and the current training and practice of SI has no basis in massage therapy, and we do not use the terms “massage” or “therapy” to describe or advertise our work. Structural Integration is not part of massage standards of training, and is not based in the practice of massage therapy. Please do not require SI practitioners to be regulated by a board of massage therapists, who are not familiar with or competent in the practice of Structural Integration. Because training in massage therapy is not relevant to or necessary for the practice of the Structural Integration, mandatory massage therapy licensing would place a burden of unnecessary training and expenses on our Practitioners. Please refer to www.theiasi.net for more information.

As other professions have already requested, we ask that the Section 1 of the bill be amended by adding further exemptions to Section 4731.15 (F) of the Revised Code, for

“persons who:

- (a) use touch, words, and directed movement to deepen awareness of existing patterns of movement as well as to suggest new possibilities of movement;
- (b) use energy or superficial touch to affect the energy systems of the human body; or

(c) use touch to effect change in the structure of the body while engaged in the practice of structural integration; and are recognized by or meet 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 and are supported by the AMTA and numerous other organizations representing non-massage practices.

Thank you for your consideration. Please feel free to contact me with any questions you may have.

Sincerely,

Christine Doo
Board Certified Structural Integrator
Law and Regulations Committee Chair
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