

College of Message Therapists of Ontario

Standards of Practice Revision Project

Final Report

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1.0 BACKGROUND

The College of Massage Therapists of Ontario (CMTO) is the regulator established by the provincial government to regulate the practice of Massage Therapy and to govern the conduct of Registered Massage Therapists (RMTs) through the provisions of the [Regulated Health Professions Act \(1991\)](#) (RHPA) and the [Massage Therapy Act \(1991\)](#). CMTO has over 14,000 registrants (Registered Massage Therapist or RMTs) and has been regulating the Massage Therapy profession in the province of Ontario since 1994.¹

CMTO's most recent Standards of Practice (Standards), which outline the expectations for professional practice of RMTs, were developed in 2006. CMTO initiated a project in September 2019 to review and update the Standards to reflect current needs and trends, as well as CMTO's Practice Resource Framework and Practice Resource Development process. Given the importance of an evidence-informed approach to policy, CMTO hired a consultant firm, Parker-Taillon Consulting Inc., to assist with this work. The Consultants worked closely with the CMTO Director of Professional Practice, and the CMTO Director of Policy and Communications [Client Key Contacts (CKCs)] throughout the project. The Standards of Practice Advisory Group (SPAG), composed of representative members of CMTO (drawing upon RMTs from a diverse group of practice settings, experience and geographic locations) was established to provide input into the process. One specific area of focus for the SPAG was on developing Standards that could be implemented by the profession regardless of practice setting.

Over approximately 17 months, the project involved the following key steps:

1. Conducting an environmental scan;
2. Development of Draft 1 of the Standards;
3. Planning and facilitation of virtual meetings with the SPAG to review Draft 1 of the Standards and begin the development of Draft 2;
4. Stakeholder consultation to validate Draft 2 of the Standards using an electronic survey format (sent to all RMTs and others); and
5. Completion of a final Standards document and final report.

It is of particular note that this project took place during the global COVID-19 pandemic. The public health requirements of isolation and social distancing required changes to the initial work plan and accommodations on the part of CMTO staff, the Consultants and the SPAG, to successfully complete the project within the required timeframe.

2.0 ENVIRONMENTAL SCAN

The purpose of the environmental scan was to gather and analyze information from within and outside CMTO to help inform the development of Draft 1 of the Standards. The environmental scan involved five major activities including

1. review of CMTO professional documents including complaints data;
2. review of the standards from comparator regulatory organizations;
3. meeting with CKCs and CMTO Quality Assurance Program Consultants regarding correlation of the Standards and STRiVE – the Quality Assurance Program;
4. conducting two focus groups, involving a sample of CMTO registrants, to obtain feedback on the 2006 CMTO Standards; and
5. analysis and preparation of recommendations.

¹ College of Massage Therapists of Ontario. (2019) *About the College Webpage*. Retrieved from: <https://www.cmta.com/about-the-college/>

The results of the environmental scan revealed the following:

- The review of CMTO professional documents indicated that CMTO has a number of key professional guides and material, including a template for the revised Standards. It was felt to be important to ensure that messaging and terminology in the key professional documents is reflected within the revised Standards to promote consistency with all College documents. The review of complaints data highlighted important topics to be considered with the Standards review such as sexual abuse, unprofessional conduct, inappropriate billing practices, treatment causing injury, failing to maintain records, incapacity and professional issues.
- The review of the standards from nine comparator organizations (Ontario, national and international regulatory organizations) provided content and architecture considerations for the development of the revised CMTO Standards including:
 - *Purpose and Expectations* – The majority of comparators expressed a purpose for either individual standards or the standards as a whole including: describes minimal level of expected performance, defines level of performance, and provides a framework for practice and continuing competence.
 - *Standards Architecture* – The results indicated a split in comparators who presented their standards using a stand-alone approach, versus all in one document. The stand-alone approach seems to be increasingly the current architecture of choice, permitting ready access of registrants to required information, and flexibility on the part of the regulatory college to revise, update and develop standards in response to changing practice trends.
 - *Standards Topics Areas* – The largest proportion of standards found in comparators was related to client care, followed by record keeping and regulatory responsibilities, business practices, professional responsibilities, boundaries/sexual abuse and supervision, collaboration, communication, infection prevention/control and safety.
 - *Individual Standards Format and Additional Information* – The most consistent element in the format of the individual standards was the inclusion of requirements that outlined how registrants can meet the standard. This was followed by the inclusion of a standard statement and purpose. Additional information in the standards reviewed included: linkages to other relevant information, a glossary, references/resources and appendices with additional information.
- The meeting of the Standards Consultants, Quality Assurance Program Consultants and CMTO representatives highlighted that as the Career Span Competencies (CSCs) form the basis of STRiVE, and the tools for STRiVE depend on the revised Standards, it is important that there are linkages between the CSCs and the revised Standards to help facilitate understanding and uptake of both.
- The feedback from the CMTO registrants that participated in the focus groups indicated that the current CMTO Standards are used regularly to help guide their practice. Key suggestions for the revised Standards included: simplify the language making it clear and user-friendly, avoid repetition, use hyperlinks within the Standards to have ready access to related information, post the Standards on the website in stand-alone and composite format, and make linkages to STRiVE.

The Consultants reviewed the environmental scan findings for key themes, developed a number of recommendations and prepared a document entitled “Proposed Standards Architecture and Format for Individual Standards.”

The next step in the process was to discuss the environmental scan findings, recommendations, and proposed Standards architecture and format with the SPAG. The SPAG met on February 3, 2020 by teleconference, agreed with the recommendations, and made additional suggestions for the revised Standards.

3.0 DEVELOPMENT OF DRAFT 1 OF THE STANDARDS

The Consultants used the following to develop Draft 1 of the Standards: proposed standards architecture and format for individual standards; relevant legislation, CMTO documents (e.g., template for the revised Standards, Code of Ethics, Position Statements/Guidelines); input from the Quality Assurance Program Consultants; the review of comparators and complaints information; and feedback from the focus groups and the SPAG. Draft 1 of the Standards was circulated to CMTO staff for feedback and subsequently revised prior to circulation to the SPAG. While the intention was to have the final version of each Standard available as a stand-alone unit, during the development they were all included in one document to facilitate review.

The architecture and format of Draft 1 of the Standards included the following elements:

- The document began with an introductory section entitled *About the Standards* which included Background, Purpose and Organization.
- The 15 Standards were outlined in alphabetical order according to the Standard title with the objective to facilitate registrants' access and future electronic presentation (Acupuncture, Advertising, Client-centred Care, Collaboration and Professional Relationships, Communication, Conflict of Interest, Consent, Fees and Billing, Infection Prevention and Control, Prevention of Sexual Abuse, Privacy and Confidentiality, Professional Boundaries, Record Keeping and Information Management, Regulatory/Professional Responsibilities, Safety and Risk Management).
- Each Standard included the following: Registered Massage Therapist Outcome, Client Outcome, Requirements (Legislative and Additional), Resources and Advice, Related Standards, and Related Career-Span Competencies.
- A glossary was included at the end of the document. However the intent was that in the final version of the Standards, hyperlinks of specific terms would be made within each Standard to an electronic Glossary of relevant words.

4.0 FACILITATED VIRTUAL MEETINGS WITH THE SPAG

The original project work plan included a facilitated one-day, face-to-face meeting with the SPAG in May, in the CMTO boardroom in Toronto. Due to the COVID-19 pandemic and a province-wide lockdown, four facilitated, three-hour virtual meetings via Microsoft Teams were held on May 20, 21, 22 and 27, 2020. Meeting participants included SPAG members as well as CMTO staff and the two Consultants. The objective of the meeting was to obtain feedback from the SPAG members on Draft 1 of the Standards.

Prior to the meetings, participants were asked to complete a Workbook that required them to consider whether each Standard statement should be: *left as is*, *revised (specify how)*, or *deleted*. In addition, they were asked to consider whether the Standard could be applied in all practice settings and if there was repetition or any gaps in the content. A consensus approach was used for decision-making during the meeting. The Standards were then revised based on the feedback from the SPAG.

5.0 DEVELOPMENT OF DRAFT 2 OF THE STANDARDS

Review by CMTO Staff and Legal Counsel

In June 2020, CMTO staff revised the Draft 1 of the Standards, with input from the CMTO Legal Counsel, to reflect the SPAG feedback, confirm coherence with the existing legislation, ensure clarity of the information for registrants and mitigate situations of high risk. This iteration became Draft 2. During this process, three Standards were removed (Advertising, Record Keeping and Information Management, Regulatory/Professional Responsibilities) as it was felt that the legislation provided clear guidance related to these topics. One Standard was added (Draping) as this was a topic of potential confusion to registrants and considered important to protecting the public interest.

Review by the Quality Assurance Committee

In early July 2020, Draft 2 of the Standards was sent to SPAG and the Quality Assurance Committee (QAC) for feedback. SPAG members were asked to submit their comments in writing. The QAC reviewed Draft 2 of the Standards at their virtual meetings on July 20 and 29, 2020. In light of SPAG feedback, they suggested additional revisions that were incorporated into this draft of the Standards by CMTO staff.

Review by CMTO Council

CMTO Council reviewed Draft 2 of the Standards at their meeting on September 22, 2020 and approved this version of the Standards for survey consultation.

6.0 SURVEY CONSULTATION ON DRAFT 2 OF THE STANDARDS

The purpose of the survey consultation was to validate Draft 2 of the Standards with CMTO regulated members, clients and external stakeholders, ensure that the Standards were understandable and implementable, and obtain feedback to further inform the Standards review.

Stakeholder Consultation Approach

The invitation to participate in the survey consultation was distributed to a total of 15,055 RMTs, 136 stakeholders, and 15 CMTO Council members. Ontario's Citizen Advisory Group was also made aware of the consultation and invited to participate. The survey was also publicized to the public via social media. All potential participants were sent an email on October 1, 2020, that included a link to the Standards of Practice consultation page. The survey was open from October 1 to November 16, 2020 and included three sections:

- demographic information about respondents,
- feedback on each of the Standards, and
- a question to obtain general feedback on the Standards.

Once the survey was closed, CMTO staff and the Consultants worked collaboratively to analyze both the quantitative and the qualitative results from the on-line survey and other responses received. The comments provided on each Standard were content analyzed for key themes. The Consultants prepared a draft Survey Consultation Report and submitted it to CMTO staff for feedback. Based on the feedback, the Consultants prepared the final Survey Consultation Report that is provided in a separate document entitled *CMTO Standards of Practice Survey Consultation Report - Final January 29, 2021* (see Companion Document 1).

Stakeholder Consultation Results

A total of 1624 individuals opened the survey and responded to the initial question related to type of respondent. The largest group was CMTO registrants who represented 93.41% of survey respondents and approximately 9.98% of CMTO registrants. Of particular note was the relatively high response rate of members of the public/clients who responded to the survey with 63 respondents, representing 3.88% of all respondents. For the most part, the characteristics of the CMTO registrant respondents, in terms of primary practice setting and years of experience, generally reflected the CMTO registrant data for a similar time period.

The *response rate* for each Standard varied throughout the survey and ranged from 631 (Client-centred Care) to 216 (Safety and Risk Management), with an average rate of 321. This differential could be due to certain Standards being of more interest to respondents, such as Client-centred Care. Even though respondents could select which Standards they wished to respond to, a progressively diminishing number of respondents was noted towards the end of the Standard document, which could possibly reflect an element of survey fatigue in participants, which is not unusual for a survey of this length.

The percentage of respondents who indicated that a specific Standard was *all easy to understand* ranged from 83.99% (Acupuncture) to 95.95% (Privacy and Confidentiality), with an average of 89%, indicating that overall, the large majority of respondents had no difficulty understanding the Standards. These findings also highlighted that five of the Standards, where only approximately 85% of respondents indicated the Standard was all easy to understand, required further consideration to identify a few specific issues which may have affected the Standard's clarity (i.e., Acupuncture, Client-centred Care, Collaboration and Professional Relationships, Fees and Billing, Prevention of Sexual Abuse).

The percentage of respondents who indicated that a specific Standard was *all easy to implement* ranged from 87.00% (Collaboration and Professional Relationships) to 97.73% (Privacy and Confidentiality), with an average of 93%. All of the Standards, with the exception of Collaboration and Professional Relationships, received an over 90.00% positive rating in terms of their ability to be implemented.

A number of *general comments* were also received and included: positive feedback on the Standards; questions about terminology; repetition of feedback received on individual Standards; and comments related to repetition throughout the Standards generally, and specifically repetition of consent and consent for sensitive areas.

In *summary*, these positive findings indicated that overall, survey respondents felt Draft 2 of the Standards was clear, easy to understand and possible to implement in a broad range of practice settings. The slightly lower *all easy to understand* ratings compared to the *all easy to implement* scores may have reflected the respondents' focus on ensuring clarity on a few specific issues as mentioned earlier. The valuable feedback provided was useful to further enhance the clarity and applicability of the Standards.

Based on the feedback from the Survey Consultation, CMTO staff prepared a list of key issues and developed Draft 3 of the Standards with suggested changes to Draft 2.

7.0 DEVELOPMENT OF THE DRAFT FINAL STANDARDS OF PRACTICE

Review by SPAG and Legal Counsel

A summary of the results of the stakeholder survey consultation, the list of key issues and Draft 3 of the Standards were presented to the SPAG at virtual meetings on December 15 and 16, 2020. SPAG members reviewed the information and provided feedback on the proposed revisions in Draft 3 of the Standards. Following the meeting, CMTO staff consolidated the SPAG feedback for each Standard, revised Draft 3 of the Standards, and updated the list of key issues. The Standards were sent to Legal Counsel for further review in December 2020.

Feedback from the survey consultation and the SPAG highlighted several issues related to the Draping Standard that required further clarification. In addition to questions about some of the wording and repetition, there was confusion around using clothing instead of draping, draping sensitive areas and treatment of the chest of males, and exceptions to reaching under draping during Massage Therapy treatment. CMTO staff worked with Legal Counsel to clarify the Requirements around these issues and the Draping Standard was revised.

Mini Consultation on the Draping Standard

In order to receive feedback on the revised Draping Standard (renamed Draping and Physical Privacy), a mini consultation was carried out with selected RMTs and Massage Therapy clients/the public. Peer Assessors of the College, and the SPAG were invited to participate in an online survey from January 7, 2021 to January 13, 2021. Members of Ontario's Citizen Advisory Group, as a sample of Massage Therapy clients, were invited to participate in an online survey from January 11, 2021 to January 18, 2021. A total of 43 RMTs and 25 client representatives responded to the survey. CMTO staff analyzed the feedback, highlighted specific areas requiring change and revised the Standard in consultation with Legal Counsel. A summary of the mini consultation results is included in Companion Document 1.

Review by the Quality Assurance Committee

The Survey Consultation Report, the list of key issues and Draft 3 of the Standards (minus the Draping and Physical Privacy Standard) were circulated to the QAC in preparation for their meeting on January 18, 2021. At that meeting the QAC reviewed Draft 3 of the Standards and suggested a few minor revisions. The Draping and Physical Privacy Standard was presented to the QAC at a focused meeting on January 29, 2021, along with the revised Draft 3 of the Standards. Following a careful review, the QAC approved in principle Draft 3 of the Standards to be submitted to CMTO Council for approval.

CMTO staff revised Draft 3 of the Standards based on the outcome of the QAC discussions to create the draft final Standards for presentation to the CMTO Council on February 9, 2021.

This Final Report was submitted to CMTO on January 29, 2021.