



CALIFORNIA
MASSAGE THERAPY
COUNCIL

Board of Directors Meeting

AGENDA

April 12, 2022

Hilton Oakland Airport

Oakland, CA



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MISSION STATEMENT

California Massage Therapy Council's mission is to protect the public by certifying massage professionals in California that meet the requirements in the law and approving massage programs that meet the minimum standards for training and curriculum.

California Massage Therapy Council

Board Members

Jeff Forman, Chairman, Appointed by the Office of the Chancellor of the California Community Colleges

Ronald Bates, Vice Chair, Appointed by League of California Cities

Michael Marylander, Treasurer, Appointed by Board

Shana Faber, Secretary, Appointed by Board

Michael Callagy, Appointed by California State Association of Counties

Mark Dixon, Appointed by Board

Heather Forshey, Appointed by San Mateo County Department of Health

Sara Frazier, Appointed by California Association of Private Postsecondary Schools

John Lambert, Appointed by American Massage Therapy Association, California Chapter

Bernadette Murray, Appointed by Associated Bodywork & Massage Professionals

Stephany Powell, Appointed by Journey Out, Anti-Human Trafficking Organization

Tracy Rhine, Appointed by the California Department of Consumer Affairs

Sean Thuilliez, Appointed by California Police Chiefs Association



RULES OF DEBATE AND DISCUSSION

1. Only one item, the item on the floor, is discussed at a time.
2. Only one person speaks at a time:
 - The person introducing the item;
 - The person speaking for or against the item;
 - Or the person asking or answering a question or raising a point of order.
3. Side conversations will be ruled out of order.
4. Directors debating a motion will have two minutes to speak, once on each motion, with three each from supporting and opposing sides, at which time the motion will go to a vote. The board may vote to extend time for debate.
5. When you want to speak, raise your hand and wait to be called on by the Chair.
6. A question is not an occasion to make an argument.

See accompanying Parliamentary Procedures At-A-Glance

Parliamentary Procedures At-A-Glance

To Do This (1)	You Say This	May You Interrupt Speaker?	Must You Be Seconded?	Is the Motion Debatable?	Is the Motion Amendable?	What Vote is Required?
Adjourn the meeting (before all business is complete)	“I move that we adjourn.”	May not interrupt speaker	Must be seconded	Not debatable	Not amendable	Majority vote
Recess the meeting	“I move that we recess until...”	May not interrupt speaker	Must be seconded	Not debatable	Amendable	Majority vote
Complain about noise, room temperature, etc.	“Point of privilege”	May interrupt speaker	No second needed	Not debatable (2)	Not amendable	None (3)
End debate	“I move the previous question”	May not interrupt speaker	Must be seconded	Not debatable	Not amendable	Majority vote
Amend a motion	“I move that this motion be amended by..”	May not interrupt speaker	Must be seconded	Debatable	Amendable	Majority vote
Object to a procedure or to a personal affront	“Point of Order”	May interrupt the speaker	No second needed	Not debatable	Not amendable	None (3)
Request information	“Point of information”	If urgent, may interrupt speaker	No second needed	Not debatable	Not amendable	None

Notes:

- These motions or points are listed in established order of precedence. When any one of them is pending, you may not introduce another that’s listed below it. But you may introduce another that’s listed above it.
- In this case, any resulting motion is debatable.
- Moderator decides.



CALIFORNIA MASSAGE THERAPY COUNCIL

One Capitol Mall, Suite 800 | Sacramento, CA 95814
tel 916.669.5336 fax 916.669.5337 www.camtc.org

Sent and Posted: April 2, 2022

NOTICE OF PUBLIC MEETING

April 12, 2022 – 10:30 a.m.
Hilton Oakland Airport
One Hegenberger Road
Oakland, CA 94621

AGENDA

1. Call to order, roll call, and establish quorum
2. Chair's comments
 - a. Welcome/Introductions
 - b. Rules of Debate
3. Approval of minutes from December 16, 2021, meeting
4. Pandemic related loans
5. CAMTC Massage Career Opportunity Program
6. Chief Executive Officer's report
 - a. Legislative update
 - b. Covid-19 Response
 - c. Strategic Priorities
 - d. Operations
 - e. Finance
 - g. Outreach
7. Treasurer's report
 - a. Applications received
 - b. Financial statements
 - c. Conclusions
 - d. Comments/discussion on financial reports

8. Director of Governmental Affairs, Human Trafficking's report
 - a. Local regulation
 - b. State Legislation
 - c. Human Trafficking
9. Director of Operations' report
 - a. Application Processing
 - b. Customer Service
10. Director of Educational Standards Division's report
 - a. School Status Updates
 - b. School Outreach
 - c. Looking Forward
11. Director of Law and Code Enforcement Relations' report
 - a. Interaction with law and code enforcement agencies
 - b. Training
12. Outreach Director's report
 - a. Upcoming Events
 - b. Schools Outreach
 - c. Law Enforcement Outreach
 - d. Governmental Affairs Outreach
13. Schedule for 2022 Board meetings
14. Public comments regarding issues not on this agenda
15. Items/suggestions from Board members for future meeting agendas
16. Adjourn

All agenda items are subject to discussion and possible action. All interested parties are invited to attend the meeting. Time will be allowed for members of the public to make comments on each item (up to 2 minutes). To make a request for more information, to submit comments to the Board, or to make a request regarding a disability-related modification or accommodations for the meeting, please contact CAMTC via email at info@camtc.org. Requests for disability-related modification or accommodation for the meeting should be made at least 48 hours prior to the meeting time. This notice and agenda is available on the Internet at <http://www.camtc.org>



April 6, 2022

To: CAMTC Board of Directors

From: Ahmos Netanel, CEO

Subject: Pandemic related loans update

PPP loan draw #2

On February 16, 2022, the SBA informed CAMTC that the \$348,756 PPP loan draw #2 was forgiven.

EIDL

In January 2022, CAMTC started making monthly payments of \$641 on the \$150,000 EIDL loan.

This is a 30-year loan, with an annual interest rate of 2.75%. There are no prepayment penalties.

CAMTC Massage Career Opportunity Program

This agenda item has been tabled until further notice.



April 6, 2022

To: CAMTC Board of Directors

From: Ahmos Netanel, CEO

Subject: CEO report

Sunset Update

On February 18, 2022, Assembly Bill 2687 was introduced by the Assembly Committee on Business & Professions as a sunset spot bill. The Legislature informed CAMTC that this bill will be used as the dedicated vehicle to extend the Massage Therapy Act beyond January 1, 2023. May 6, 2022 is the deadline for the Assembly Committee on Business & Professions to hear AB 2687 and report it to the Assembly floor.

On March 18, 2022, CAMTC went through a Joint Sunset Oversight Hearing (see hearing Agenda attached). The hearing lasted close to two and a half hours. When public comments were made, one individual was in favor of licensing and 29 individuals, small business owners and organizations made compelling arguments against government mandated licensing and in support of the continuation of CAMTC as a nonprofit organization implementing a voluntary statewide certification of professionals and approval of schools.

In 2021, Senator Richard Roth, Chairman of the Senate Business, Professions and Economic Development Committee expressed his interest in knowing the actual fee massage therapists will have to pay if the state mandates licensing under the Department of Consumer Affairs (DCA). In response to Chairman's Roth suggestion, CAMTC retained a well-qualified firm to conduct a study regarding the cost, efficacy, and consequences of creating a new Massage Therapy Board under the DCA. Capital Accounting Partners, LLC has a history of working closely with the DCA. They have completed eleven such studies for the DCA. Their reports are noted for their independence. The entire report is attached. A few immediate highlights are:

- Currently, a biannual certificate fee under CAMTC is \$200. The study found that a Massage Therapy Board would require a biannual fee of \$1,065
- Formal discipline times will increase demonstrably
- The unique relationship of CAMTC with local government will be lost, or the very least, severely compromised
- 49% of a comparable DCA Board budget is monopolized by external expenses being charged by the State Attorney General, the Office of Administrative Hearings, and DCA enforcement pro rata.

Covid-19 Response

As COVID-19 numbers continue to drop, so are the number of inquiries we receive from certificate holders. At this point, most questions are related to masking requirements related to massage. As the newest variant of the coronavirus spreads quickly across the world, we believe that while it's important to be aware, the latest strain is not necessarily something to worry about in California. CAMTC is fully prepared to swiftly pivot operational protocols if at any point we need to respond to the spread of a new strain.

Strategic Priorities

Three out of the four strategic priorities the Board adopted for 2021 (attached) have been implemented.

The implementation of priority #2, “Local Government: Contact all city and county elected officials to offer assistance to update their ordinances to reflect current state law.” was deliberately postponed to 2022. As I previously reported, in 2021 CAMTC sent letters to all city and county managers offering to aid them in updating their ordinances to reflect current state law and as well as to make them aware of CAMTC’s training program. Multiple cities have responded positively, and senior staff is still in the process of providing support to cities and counties that requested assistance. In talking with multiple local government elected officials, we were advised to hold off on sending new letters until mid-2022.

As reported in the December 7, 2021 CEO report, 2021 Priority #4 was implemented. We sent out a survey to CAMTC certificate holders to determine if there is a practice, policy, and/or procedure the Board should implement or revise to better serve their needs as certificate holders. A similar survey was sent to approved schools on November 26, 2021.

A summary of the most frequent responses related to actionable Board policies can be found attached.

Operations

CAMTC Performance Measures - Attached are CAMTC’s Disciplinary Performance Metrics for 2021.

Finance

As of January 31, 2022, change to net assets is better than expected by \$207,996 (budgeted was a deficit of \$11,977, actual was \$96,019). Cash reserve was \$3,319,686, which is equal to more than six months of operating expenses

CAMTC’s Bank Account Summary is attached.

CALIFORNIA LEGISLATURE

STATE CAPITOL
SACRAMENTO, CALIFORNIA
95814

Joint Sunset Review Oversight Hearing

Senate Committee on Business, Professions, and Economic Development and Assembly Committee on Business and Professions

Senator Richard D. Roth and Assemblymember Marc Berman

Friday, March 18, 2022

10:30 a.m. – State Capitol, Senate Chamber

Agenda

ITEM 1. REVIEW OF THE BOARD OF REGISTERED NURSING

- A. *Overview of the Board and Discussion of Board Operations and Identified Issues*
Dolores Trujillo, Board President
Loretta Melby, Executive Officer
- B. *Professional Groups, Organizations, and Individuals*

ITEM 2. REVIEW OF THE CALIFORNIA MASSAGE THERAPY COUNCIL

- A. *Overview of the Council and Discussion of its Operations and Identified Issues*
Jeffrey Forman Ph.D., Board Chair
Michael Callagy, Board Member
Ahmos Netanel, Chief Executive Officer
Alison Siegel, Special Counsel
- B. *Models for Massage Therapy Regulation*
Bob Benson, Chairman, Associated Bodywork & Massage Professionals
James Specker, Senior Director of Industry and Government Relations, American
Massage Therapy Association
Terry Harman, Assistant District Attorney, County of Santa Clara
Michael Knudsen, California Professional Massage Therapy Coalition
- C. *Professional Groups, Organizations, and Individuals*



MASSAGE

Therapy
Professionals



Certification Vs. Licensing for Massage Professionals in the State of California

Fee Analysis 2022



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Introduction, Scope, and Executive Summary

Introduction and Scope

The California Massage Therapy Council (CAMTC) engaged Capital Accounting Partners to assess the cost of developing and operating a board that would license Massage Therapists in contrast to a certifying organization. There were three broad objectives

1. Assess the current operating cost structure of the Council and then rebuild that same or similar structure as a licensing board.
2. Identify a benchmark organization and compare its performance against similar measures utilized by CAMTC.
3. Provide anecdotal observations as appropriate on internal business processes and service delivery.

Executive Summary

This report will explore a well-supported methodology for estimating costs to massage therapists if State Licensure was enacted. Based on our analysis, such a change in structure will require a biannual licensing fee of \$1,065, whereas the current biannual certificate fee is \$200. This and other significant findings are summarized in the table below.

TABLE 1: SUMMARY OF MAJOR FINDINGS

	CAMTC (Certifying Council)	Licensing Board
Full Time Equivalent (FTE Requirements)	41	110
Annual Expenses	\$ 5,463,863	\$ 29,844,643
Annual Administrative Cost / Licensee (or certificate holder)	\$ 98	\$ 533
Cost Per Biannual Recertification	\$ 200	\$ 1,065

These costs and additional FTE requirements result from structural differences between a private organization that provides professional certifications and a government agency that provides professional licensing. The following is a sample of the differences:

TABLE 2: SUMMARY OF DIFFERENCES

Private Organization (CAMTC) Providing Professional Certifications	Public Board or Bureau Providing Professional Licensing
Seeking a professional certification for a Massage Therapist is a voluntary action. However, some local government agencies may require it to provide massage for compensation in their jurisdiction.	Securing a license to provide Massage Therapy services is a state requirement to provide massage for compensation.
The Business and Professions Code (sections 4600-4621) govern investigations and disciplinary actions. This allows CAMTC to take disciplinary action based on the "preponderance of the evidence." This allows CAMTC to discipline certificate holders or conduct-based violations that a licensing board cannot take. (Bus. & Prof. Code section 4609.)	The California Administrative Procedures Act (APA) governs or highly influences investigations and disciplinary actions. This requires licensing boards or bureaus to provide "clear and convincing proof to a reasonable certainty" before disciplinary action. They must also comply with the California Public Records Act and the Fair Chance Licensing Act, which limits conduct based violations. This additional regulatory requirement results in longer lead times before a disciplinary action can be taken, (see figure 7).
4. Some California cities require Massage Therapists to be certified in order to provide massage for compensation in their jurisdiction. The information-sharing provisions with local government in CAMTC's law ¹create a natural partnership between CAMTC and local law enforcement and code enforcement that quickly responds to public safety threats. Because of this code in the law, when a massage therapist is discovered operating unprofessionally by a local enforcement agency, they will	We understand that if local law or code enforcement discovered a Massage Therapist selling sexual services (for example), the therapist might never be prosecuted- due to its difficulty. However, it is unclear if State licensing boards have similar information-sharing provisions in their law and would therefore be contacted by local law and/or code enforcement for possible investigation and discipline.

¹ Massage Therapy Act 2020, (sections 4600.5 (c), 4614. (a))

Private Organization (CAMTC) Providing Professional Certifications	Public Board or Bureau Providing Professional Licensing
frequently inform CAMTC, which can launch a formal investigation that may also result in the revocation of the therapist's certification.	

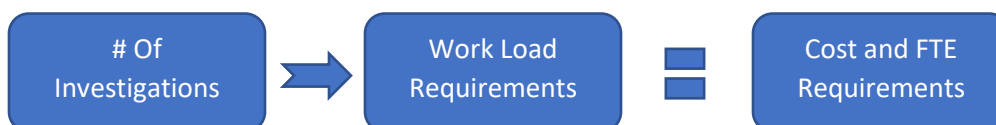
Changes of Cost to Individual Massage Therapists

Because of these differences, it is difficult to determine, with absolute precision, the additional cost to a Massage Therapist if the State of California were to set up a licensing board or bureau. However, our analysis will demonstrate that individual licensees will be required to pay significant new costs to acquire and maintain a State license.

Number of Investigations to Calculate Workload Requirements and Drive Cost

In this approach, we replicate the number of investigations within a licensing board that the APA governs for its investigations. This model allows labor costs (the largest cost component) to float to the required labor to meet the demand.

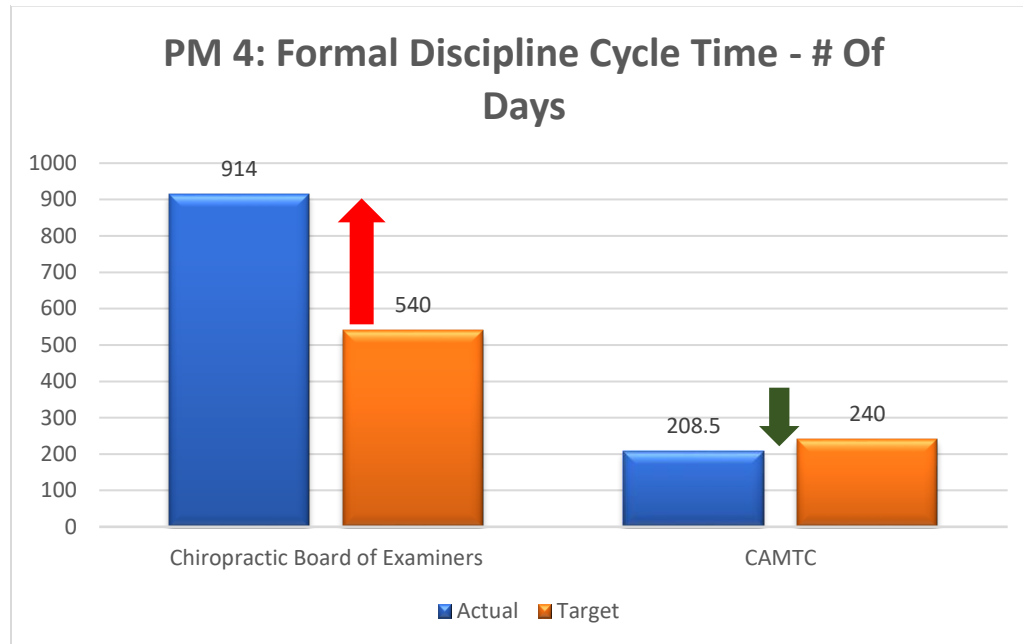
FIGURE 1: ILLUSTRATION OF APPROACH



Performance Measurement

Ultimately, the best criterion of organizational value is how well it executes its mission and services the needs of its constituents. In the pages following, we will provide more CAMTC performance measures and compare these measures with a Board that operates within the Department of Consumer Affairs (DCA). First, however, the following graphic provides an example of how CAMTC approaches its performance and its public safety mission.

FIGURE 2: EXAMPLE OF A PERFORMANCE MEASURE



This chart, and more that will follow in later pages, will demonstrate that CAMTC is performing at or better than its performance targets. In addition, it illustrates its performance against the Board of Chiropractic Examiners (BCE), which we used for benchmarking purposes. We chose BCE for benchmarking because of similar touch-based modalities and both professionals service a similar population. In addition, these are the same performance measures that DCA Board and Bureaus use in their Sunset Reports.

About the California Massage Therapy Council

The California Legislature authorized the California Massage Therapy Council (CAMTC) by enacting Senate Bill 731 and re-authorized by Assembly Bill 1147 and again in 2016 by assembly bill 2194. CAMTC is a private nonprofit public benefit corporation. Its' volunteer Board of Directors is appointed by California cities, counties, law enforcement, massage schools, the Department of Consumer Affairs, professional massage associations and other stakeholders as authorized by law in California Business and Professions Code sections 4600 *et. seq.*

CAMTC is required by *California Business and Professions Code section 4600 et. seq.* [emphasis added] to:

- Create and implement a voluntary certification program for the Massage Therapy Profession that enables consumers to identify credible Certified Massage Therapists (CMTs) quickly.
- Ensure that Certified Massage Professionals have completed sufficient training at approved schools; and
- Approve massage schools. As of July 1, 2016, CAMTC only accepts education credentials from massage school programs that have been CAMTC approved.

CAMTC's mission is to protect the public by certifying massage professionals in California that meet the requirements in the law and approving massage therapy programs that meet the minimum standards for training and curriculum.

The reader will note that CAMTC is required to execute its mission according to the standards of the *California Business and Professions Code section 4600 et. seq.* This is a different standard than the APA, followed by State Licensing Agencies. The practical impact of this is that a certifying organization like CAMTC can take disciplinary action based on the "preponderance of evidence." This means that the inquiry "is more likely than not." CAMTC also can take action on conduct-based violations identified in its statute, while State Agencies must comply with the Fair Chance Licensing Act, which limits the substantive basis of what conduct may be used to take action. Practically, this means that CAMTC can take disciplinary action with telephonic hearings and sworn declarations for conduct-based violations as well as criminal convictions.

In contrast, licensing organizations that are governed by the APA and Fair Chance Licensing Act must meet a very different standard for their enforcement actions. A licensing board must show "clear and convincing proof to a reasonable certainty" before disciplinary actions can take effect against licensees. These actions appear more like a civil trial and can result in public reprimands, probation, suspension, or the complete revocation of a professional license. In addition, the Fair Chance Licensing Act limits action on conduct-based violations and criminal convictions.

Relationship to Local Government

We understand that a unique feature of CAMTC, as a certifying organization, is its relationship to local government, most importantly, law enforcement. According to the "Massage Therapy Act 2020, section 4614 (a)" CAMTC is required to share its information with a local law enforcement agency that requests it. In addition, that same law enforcement agency is required to share with CAMTC its information concerning a specific certificate holder upon request of CAMTC, (section 4614 (b)).

From our observation, this creates a natural partnership between CAMTC as a certifying organization and local law enforcement that is mutually beneficial.

Operational Highlights

Operationally CAMTC contracts with an outside management company to process new applications and applications for recertification. Advocacy & Management Group (AMG) provides back-office support. This includes a customer service phone system that handles inquiries from certificate holders, potential certificate holders, and the public. AMG is economically incentivized to meet specific performance targets identified by CAMTC leadership.

Conversely, enforcement investigations and reviews of new and existing certificate holders are managed internally. Staff attorneys, paralegals, and external legal Counsel make up most of the enforcement team.

From our observation this relationship with AMG allows CAMTC to focus on enforcement activities while an outside firm can focus on what it does best – processing applications and responding to telephone inquiries.

Costing Methodology

Driver Based Costing Models

A driver-based costing model is a robust method of calculating a specific service's cost. It seeks to measure cost on what triggers an expense. These triggers are numerical and allocate cost based on a known number. We intend to rely on personal estimates only when necessary. For example, FTE is considered the driver of HR expenses in the following table. Therefore, FTE is allocating \$1,000,000 of HR costs to other divisions within an organization.

TABLE 3: EXAMPLE OF HOW FTE DRIVES COST TO OTHER DIVISIONS

HR Expenses To Allocate or Assign		
Total HR Expenses to Assign	\$	1,000,000
Administration	10	\$ 100,000
IT	20	\$ 200,000
Finance	15	\$ 150,000
Marketing	20	\$ 200,000
Operations	35	\$ 350,000
Totals	100	\$1,000,000

The driver we used for calculating cost is the number of investigations. Investigations are a primary driver of workload; therefore, we will be modeling the current number of investigations that CAMTC processes but inside a licensing board.

Tasks and Findings

There were four specific tasks in conducting this assessment. Each step built upon another and provided critical data required for the next step. In summary, these steps are:

1. Calculate the total cost and unit cost of services provided by CAMTC to both individual certificate holders and educational institutions.
2. Identify a benchmark licensing organization from which we could engineer the two costing models.
3. Develop a model of a licensing organization based on projected workload.
4. Review and benchmark CAMTC organizational performance.

Task 1: Calculate the Full Cost and Unit Cost of Services Provided By CAMTC

The objective of this first task was to calculate an average annual cost for the two stakeholder groups of CAMTC

- Individual certificate holders, and
- Educational institutions that CAMTC has recognized for providing superior training and value to certificate holders.

This task involved interviews with staff, CAMTC leadership, and AMG leadership. Interviews were used to determine CAMTC's operating structure and allocate its costs. In our analysis, we used FY 2022 operating budget. Our objective was to allocate the full budget to the two stakeholder groups – individual certificate holders and educational institutions.

The following table will outline the results of this first task:

TABLE 4: ANNUAL COST PER UNIT

	CAMTC Full Cost of Services	Total Cost Assigned to Individual Certificate Holders	Total Cost Assigned to Educational Institutions
	\$5,463,863	\$4,862,780	\$601,083
Number of Certificate Holders and Educational Institutions		49,859	78
Full Cost Per Annual Unit		\$ 98	\$7,706

Task 2: Selecting a Benchmark Licensing Organization

In selecting an existing board to use as a benchmark, we had three criteria:

1. An organization that is providing "complementary" therapies.
2. Access to recent financial data.
3. Professionals who provide hands-on touch-based therapy.

The Board of Chiropractic Examiners (BCE) met each of these criteria. The most important of which was our ability to access recent financial data. We made multiple inquiries to secure BCE's FY 2021-22 budget data. Unfortunately, in this endeavor, we were unsuccessful. However, BCE's report that was delivered at their Board Meeting on December 16, 2021, provided adequate financial data to complete our analysis. It also included performance data that we used for benchmarking purposes.

Using BCE as a benchmarking organization provides several opportunities that we can use to build our model:

1. Calculate an average cost per FTE
2. Project FTE requirements
3. Project the cost of services & supplies as a percentage of labor cost
4. Project State and Department proratas as a percentage of labor cost

Budget Data for BCE

In the December 16, 2021, BCE Board Report, there is a recent fee audit report. The report provided the FY 2020-21 operating budget plus additional nonbudgeted adjustments for FY 2021-22. Our approach, therefore, was to add the two budget documents together with some exclusions from the nonbudget items, as the following table illustrates.

TABLE 5: FY 2021-22 NONBUDGETED EXPENSES²

California Board of Chiropractic Examiners (nonbudget Expense)			
BCE FY 2021-22	Annual Cost	Include? Or not?	Total to Include
Office Relocation	\$ 29,920	No - one time expense	
Credit Card fees	\$ 84,591	Yes - regular and recurring	\$ 84,591
Direct Fund Transfer - BAR Load Payback	\$ 250,000	No- short term expense	
Direct Fund Transfer - Supplemental Pension Payments	\$ 85,000	Yes - regular and recurring	\$ 85,000
Direct Fund Transfer - Statewide Prorata	\$ 297,000	Yes - regular and recurring	\$ 297,000
General Salary Increase (eff. 7/1/2021)	\$ 130,000	Yes - regular and recurring	\$ 130,000
Ongoing expenditure Reduction	\$ (16,000)	Yes - regular and recurring	\$ (16,000)
Annual Reserve	\$ 597,870	No-Included in startup costs	
Total Non-Budget Expenses	\$ 1,458,381		\$ 580,591

The following table will provide the total budgeted and nonbudgeted expenses included in our analysis.

² Source: Board of Chiropractic Examiners Board Meeting December 16, 2021, Matrix Report, Table 5, Page 7

TABLE 6: TOTAL BUDGED AND NONBUDGETED EXPENSES³

California Board of Chiropractic Examiners (Combined Budgeted and Non-Budgeted)

		Annual Cost	% Of Total Expenses
Salary & Wages	\$	1,388,000	
Temp Help	\$	8,000	
Statutory Exempt (EO.)	\$	116,000	
Overtime Retirement Payout	\$	1,000	
General Salary Increase (eff. 7/1/2021)	* \$	130,000	
Total Salary & Wages	\$	1,643,000.00	32%
Staff Benefits	\$	742,000	
Direct Fund Transfer - Supplemental Pension Payments	* \$	85,000	
Total Benefits	\$	827,000	50%
Total Salary & Benefits	\$	2,470,000	48%
Board Member per Diem	\$	16,000.00	0.65%
General Expense	\$	30,000.00	1.21%
Printing	\$	3,000.00	0.12%
Communication	\$	19,000.00	0.77%
Postage	\$	7,000.00	0.28%
Travel in State	\$	22,000.00	0.89%
Training	\$	9,000.00	0.36%
Facilities Operations	\$	141,000.00	5.71%
Consolidated Data Center	\$	27,000.00	1.09%
Information Technology	\$	53,000.00	2.15%
Equipment	\$	11,000.00	0.45%
Vehicle Operations	\$	42,000.00	1.70%
C&P Services - External	\$	10,000.00	0.40%
Credit Card fees	* \$	84,591.00	3.42%
Ongoing Expenditure Reduction	* \$	(16,000.00)	-0.65%
Total Operational Expenses	\$	458,591.00	9%
DCA Prorata	\$	771,000.00	31%
Direct Fund Transfer - Statewide Prorata	* \$	297,000	12%
Total Prorata & Reserve	\$	1,068,000.00	21%
Attorney General	\$	933,000.00	38%
Office of Administrative Hearings	\$	159,000.00	6%
Evidence/Witness Fees	\$	58,000.00	2%
Total External Enforcement	\$	1,150,000.00	22%
Total BCE Projected Expenses	\$	5,146,591.00	100%

*Included from nonbudgeted expense items

³ Source: Board of Chiropractic Examiners Board Meeting December 16, 2021, Matrix Report, Table 5, Pages 6-7

TABLE 7: EXPENDITURE STATISTICS

Expenditure Statistics and Analysis		
Average Labor Cost Per FTE	\$	130,000.00 ⁴
Total Labor Cost as a Percentage of Total Cost		48%
Operating Expenses as a % of Total Cost		8.9%
State and Department Prorata as a % of the Total Cost		20.8%
External enforcement as a % of the Total Cost		22.3%

We will use these data to build a driver-based costing model.

Task 3: Develop a Driver Based Model of a Licensing Organization

As stated earlier, the Business and Professions Code guides enforcement activities and influences operations of CAMTC. In contrast, the APA drives enforcement operations and costs within a licensing board or bureau. The result is that enforcement expenditures for CAMTC are substantially less than the Board of Chiropractic Examiners or any other board or bureau within DCA.

Cost Structure of an Organization Based Projected Workload

According to the December 16, 2021 Board Report delivered to BCE's Board, BCE processed 804⁵ investigations in FY 2019/20. From this same report, we learn that enforcement's total costs within BCE were \$3,047,864⁶. This same report also calculates that 49% of this cost is the result of external expenses being charged to BCE from the State Attorney General, the Office of Administrative Hearings, and DCA enforcement prorata, as the following table illustrates:

⁴ Total labor costs of \$2,470,000 / 19 FTE

⁵ December 16, 2021 Board Report, page 43 of 75.

⁶ Matrix fee audit report, page 13

TABLE 8: BCE ENFORCEMENT COSTS

External Enforcement Costs	Cost Category	Amount	Percentage
	Enforcement Staff Costs	\$ 1,565,864.	51.4%
	Attorney General	\$ 933,000.	49%
	Office of Administrative Hearings	\$ 159,000.	
	Evidence / Witness Fees	\$ 58,000.	
	C&P Services - External	\$ 10,000.	
	DCA Prorata Enforcement	\$ 322,000.	
	Total Costs	\$ 3,047,864.	100%

Therefore, we can calculate the average cost per investigation to be \$3,791 (\$3,047,864 / 804).

In contrast, CAMTC is governed by the Business and Professions Code. Based on this standard, it processes over 4,000 investigations⁷ in a year. The following table will illustrate the cost.

TABLE 9: AVERAGE COST PER INVESTIGATION

CAMTC Average Cost Per Investigation	
Total Enforcement Budget, (Capital Accounting Partners Calculation)	\$ 1,839,326
Total Enforcement Investigations	4033 ⁸
Cost Per Investigation	\$ 456

From our observation, there are two reasons why CAMTC processes ten times more investigations than BCE:

1. The biannual recertification process design is structured to identify unprofessional conduct.
2. The Business and Professions Code does not require the evidentiary standards of the APA – which often ends in a process akin to a civil trial. Instead, CAMTC complies with Fair Procedure requirements, and individuals are given sufficient notice and an opportunity to be heard. Since its inception, the low number of litigation cases it has faced speaks to the difference in evidentiary standards. The evidence is that in FY 202-21 BCE was invoiced for nearly \$1,000,000 from the California Attorney General (AG). In contrast, CAMTC has never used the services of the AG and instead relies mostly on in-house counsel.

⁷ CAMTC uses the term “reviews” while DCA boards use the term “investigations.” They are both functionally the same.

⁸ Source: 2019 Sunset Report, page 77 Table 9a

Projecting Cost for a Licensing Organization with Similar Workload

Using these data and BCE as a model, we can project that if a Massage Therapy board was created under DCA performing the same amount of work, it would cost \$29,844,643. This includes startup expenses. In addition to the hard costs, there may also be hidden capacity constraints as it will take time for staffing to develop the internal enforcement processes and systems. The impact of which may cause delays in processing formal investigations.

TABLE 10: TOTAL PROJECTED COST OF A SIMILAR LICENSING BOARD

Projected Cost of a Licensing Board with Similar Investigation/workload Requirements		
Functional Category	Projected Expenditure	
Cost Per Investigation	\$	3,791
Projected Number of Investigations		4,033 ⁹
Projected Cost of Investigations	\$	15,288,601.
Projected Administrative, Licensing, and Other Expenditures If 60% of the Total Budget is Allocated to Enforcement	\$	10,192,400.
Total Projected Operating Costs of a Licensing Board	\$	25,481,002.
Project Startup Expenses	\$	4,363,641.
Total Projected Expenses for a Licensing Board	\$	29,844,643.

Startup Expenses

Startup expenses assume:

- 1) One year to staff the operation
- 2) A loan covering one-year operating expenses (\$25,481,002)
- 3) No revenue for the first year, then building over the second year
- 4) Building a six-month reserve (\$12,740,501)
- 5) Building a database to manage 50,000 licensees (\$3,135,586¹⁰)
- 6) Recovering these costs over five years

⁹ Source: 2019 Sunset Report, page 77, Table 9a

¹⁰ One sixth of the total cost of the Business Modernization Cohort 1 (BMC 1)

Developing the Budget for a Licensing Board

Based on the analysis of BCE (Table 6, page 13) and knowing the total annual costs, we can reverse engineer a budget for a new licensing board to provide enforcement and application processing for 50,000 Massage Therapists.

TABLE 11: PROJECTED TOTAL BUDGET FOR LICENSING BOARD

California Board of Chiropractic Examiners (Combined Budgeted and Non-Budgeted)

	Annual Cost	% Of Total Labor or Total Expenses
Salary & Wages	\$ 9,527,617	
Total Salary & Wages	\$ 9,527,617	
Staff Benefits	\$ 4,795,703	
Total Benefits	\$ 4,795,703	
Total Salary & Benefits	\$ 14,323,320	48%
Board Member per Diem	\$ 92,783	0.65%
General Expense	\$ 173,967	1.21%
Printing	\$ 17,397	0.12%
Communication	\$ 110,179	0.77%
Postage	\$ 40,592	0.28%
Travel in State	\$ 127,576	0.89%
Training	\$ 52,190	0.36%
Facilities Operations	\$ 817,647	5.71%
Consolidated Data Center	\$ 156,571	1.09%
Information Technology	\$ 307,342	2.15%
Equipment	\$ 63,788	0.45%
Vehicle Operations	\$ 243,554	1.70%
C&P Services - External	\$ 57,989	0.40%
Credit Card fees	\$ 490,536	3.42%
Ongoing expenditure Reduction	\$ (92,783)	-0.65%
Total Operational Expenses	\$ 2,659,330	9%
DCA Prorata	\$ 4,470,963	31%
Direct Fund Transfer - Statewide Prorata	\$ 1,722,278	12%
		0%
Total Prorata & Reserve	\$ 6,193,241	21%
Attorney General	\$ 5,410,388	38%
Office of Administrative Hearings	\$ 922,027	6%
Evidence/Witness Fees	\$ 336,337	2%
Total External Enforcement	\$ 6,668,752	22%
Total BCE Projected Expenses	\$ 29,844,643	100%

Based on a total labor cost of \$14,323,320 and an average cost per FTE of \$130,000 (page 14, Table 7), we can calculate the FTE requirement of this new organization to be 110 FTE. In contrast, CAMTC has 41 FTE.

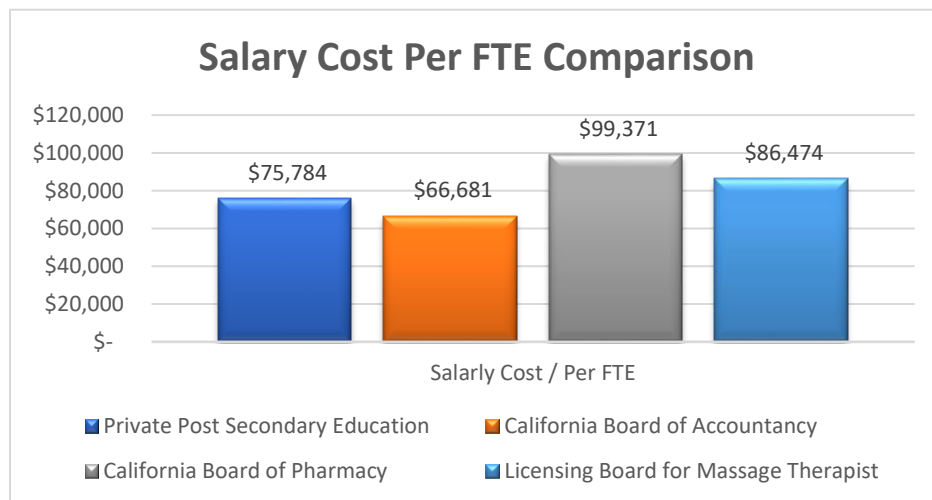
The reader may question if this budget is reasonable compared to licensing boards and bureaus of a similar size. To address this question, we reviewed organizations of a similar size and identified three that are comparable:

- 1) Bureau of Private Post Secondary Education – 110 FTE
- 2) California Board of Accountancy – 104 FTE
- 3) California Board of Pharmacy – 127 FTE

The differences between these three boards and a comparable licensing board with a similar workload requirement as CAMTC is wide and varied. For example, we would expect a licensing board for Massage Therapists to have a significant enforcement budget while enforcement for the Board of Accountancy is small. In addition, actual work requirements will drive services and supplies, and differences in staffing (and their respective bargaining units) will also drive benefit calculations.

However, we can compare FTE salary projections with these three organizations to determine a reasonable basis for comparison. The following figure will demonstrate that they compare favorably.

FIGURE 3: SALARY COST PER FTE COMPARISON



Conclusion

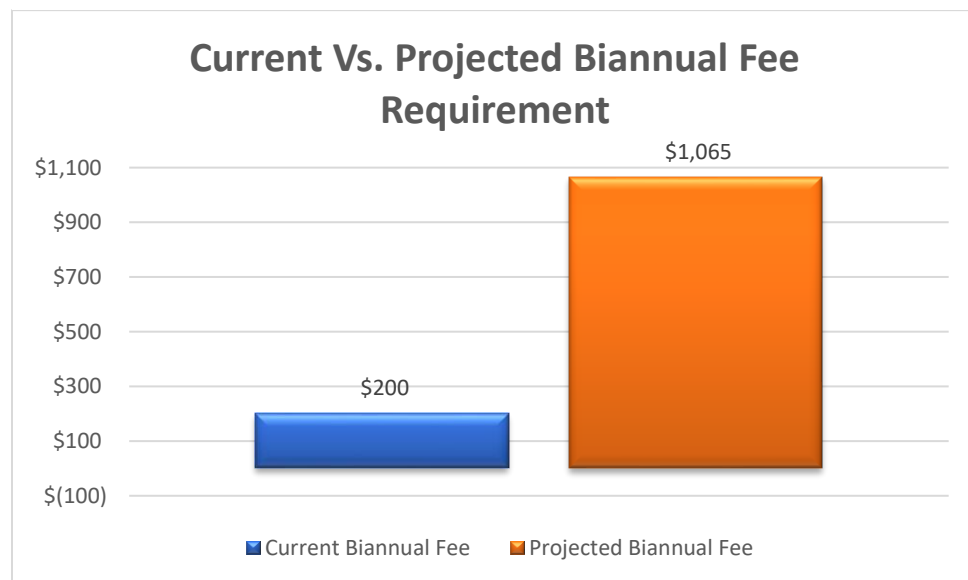
Moving from a certifying model to a licensing model will dramatically increase the costs for an individual Massage Professional. Central to this difference is the legal standard before disciplinary action. Based upon our analysis, the following table illustrates these differences.

TABLE 12: DIFFERENCES IN COST BETWEEN STAKEHOLDER GROUPS

	Percentage of Cost Allocated to Stakeholder Group	Total Cost Allocated Per Stakeholder for two years of CAMTC Certification/ school approval	Projected Cost Allocated Per Stakeholder for two years of licensure
CAMTC Budget Allocated to Individual Certificate Holders	89%	\$ 196	\$ 1,066
CAMTC Budget Allocated to Educational Institutions	11%	\$ 15,412	\$ 84,186

The following figure demonstrates the financial impact on the biannual fee for individual licenses.

FIGURE 4: DIFFERENCE IN BIANNUAL FEE REQUIREMENT



Task 4: Review and Benchmark CAMTC Organizational Performance

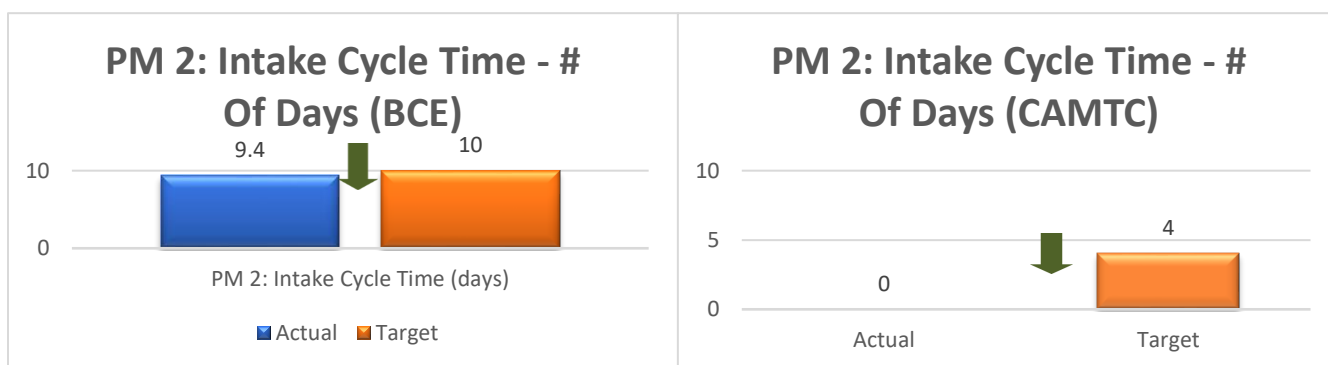
The Department of Consumer Affairs requires each board and bureau to submit regular reports on its performance. These Sunset Reports occur on a schedule that is unique to each organization. Therefore, CAMTC is also required to submit a Sunset Report using the same logic and methodology.

In benchmarking CAMTC, we again chose the (BCE). This in no way reflects a judgment upon them or a statement of our views concerning their organizational performance. We are using them because it is an organization using a touch-based modality serving a similar population. Their data comes from the December 16, 2021, Board Report (pages 19-20) delivered to their board.

Performance Measure 2: Intake Cycle Time for Processing Complaints and Assigning an Investigator

Intake cycle time is the time a complaint is received until it is processed and forwarded to an appropriate investigator. While intake cycle time for BCE nearly matches its target, CAMTC processes its complaints in the day they are received.

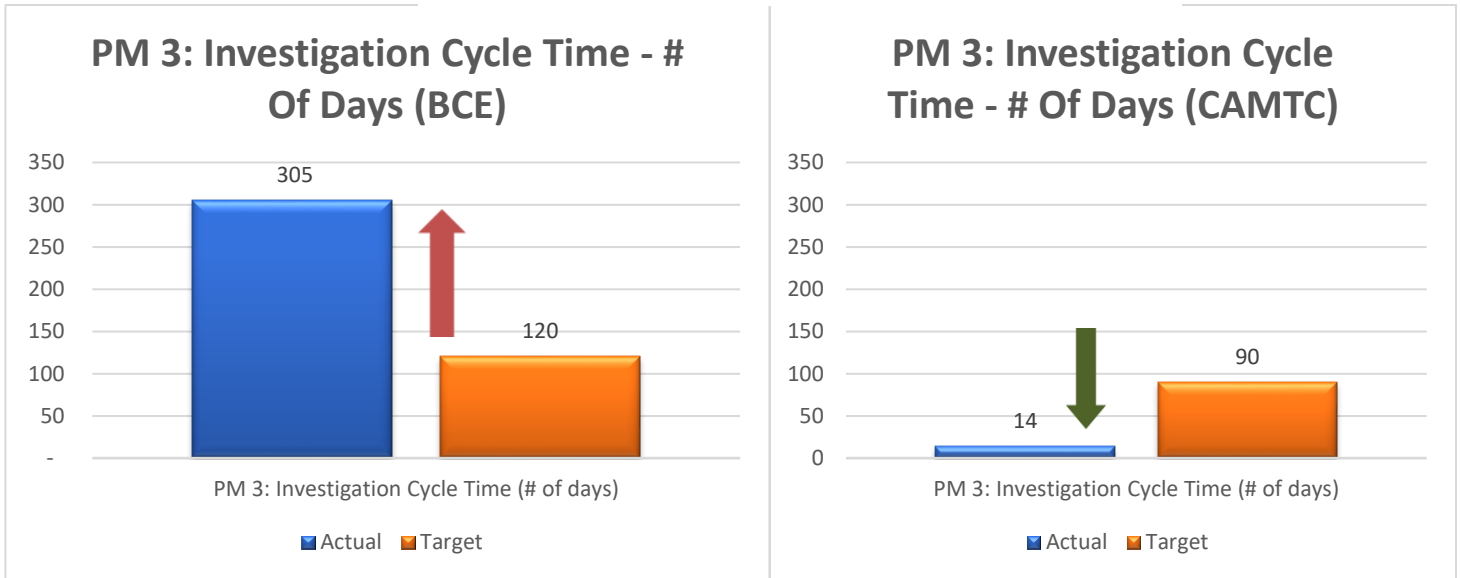
FIGURE 5: PM 2 - INTAKE CYCLE TIME COMPARISON



Performance Measure 3: Investigation Cycle Time For Complaints That Do Not Result in Formal Discipline

Performance Measure 3 is the average number of days it takes from the date that information triggering an investigation was received to the date that the investigation was resolved for those investigations that do not result in formal discipline. The reader will note that CAMTC's cycle time is faster than BCE's and that the actual time is less than its target. In contrast, BCE's cycle time is longer and substantially longer than its target.

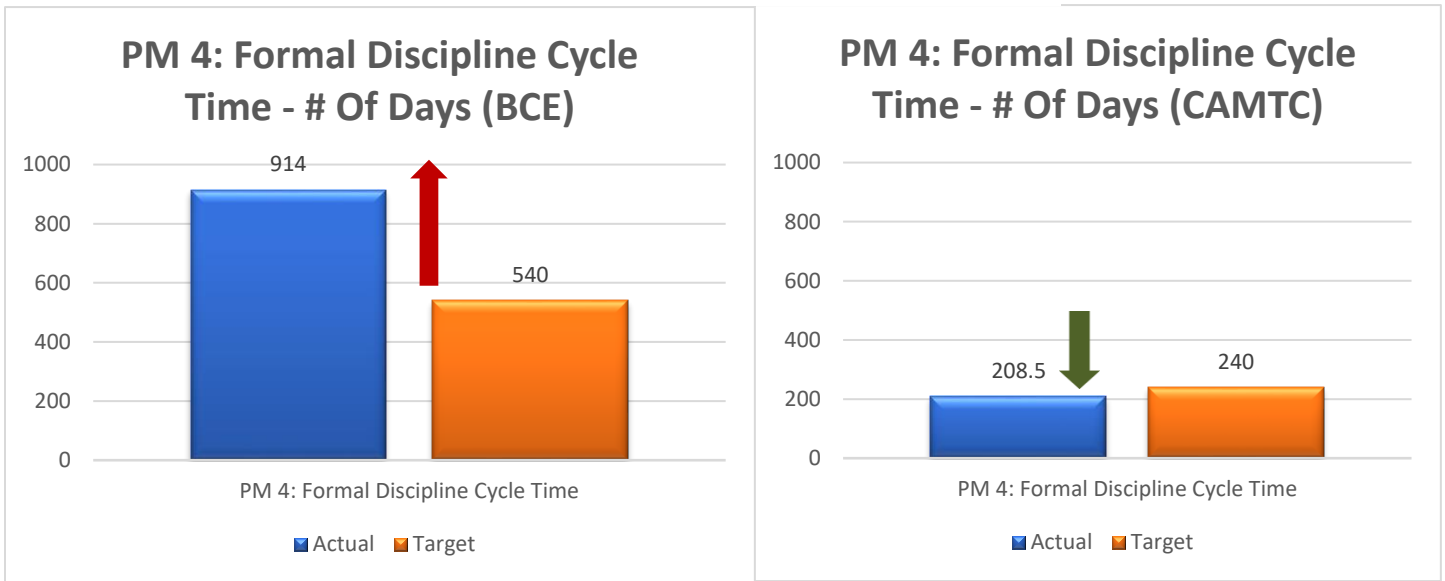
FIGURE 6: PM 3 - INVESTIGATION CYCLE TIME COMPARISON



Performance Measure 4: Formal Discipline Cycle Time

Formal discipline cycle time is the speed that formal and appropriate discipline is determined and implemented. Performance Measure 4 is the average number of days it takes from the date that information triggering an investigation is received to the date that formal discipline is imposed. Formal discipline includes revocation, suspension, and imposition of probationary terms. As in the previous example, CAMTC as a certifying organization can implement discipline faster and does so in less time than its target. In contrast, BCE as a Licensing Board requires substantially more time to implement its discipline and under-performs its target.

FIGURE 7: PM 4- FORMAL DISCIPLINE CYCLE TIME COMPARISON



Other Measures of Performance

CAMTC contracts with the Advocacy & Management Group (AMG) to provide back-office support. They are responsible for processing new applications and biannual recertifications. In addition, they provide essential customer service functions that include personalized phone service and email responses to questions by the public and/or certificate holders.

As part of the contract, AMG submits regular reports of its performance. The following are four examples of these reports.

FIGURE 8: NEW APPLICATION PROCESSING TIME

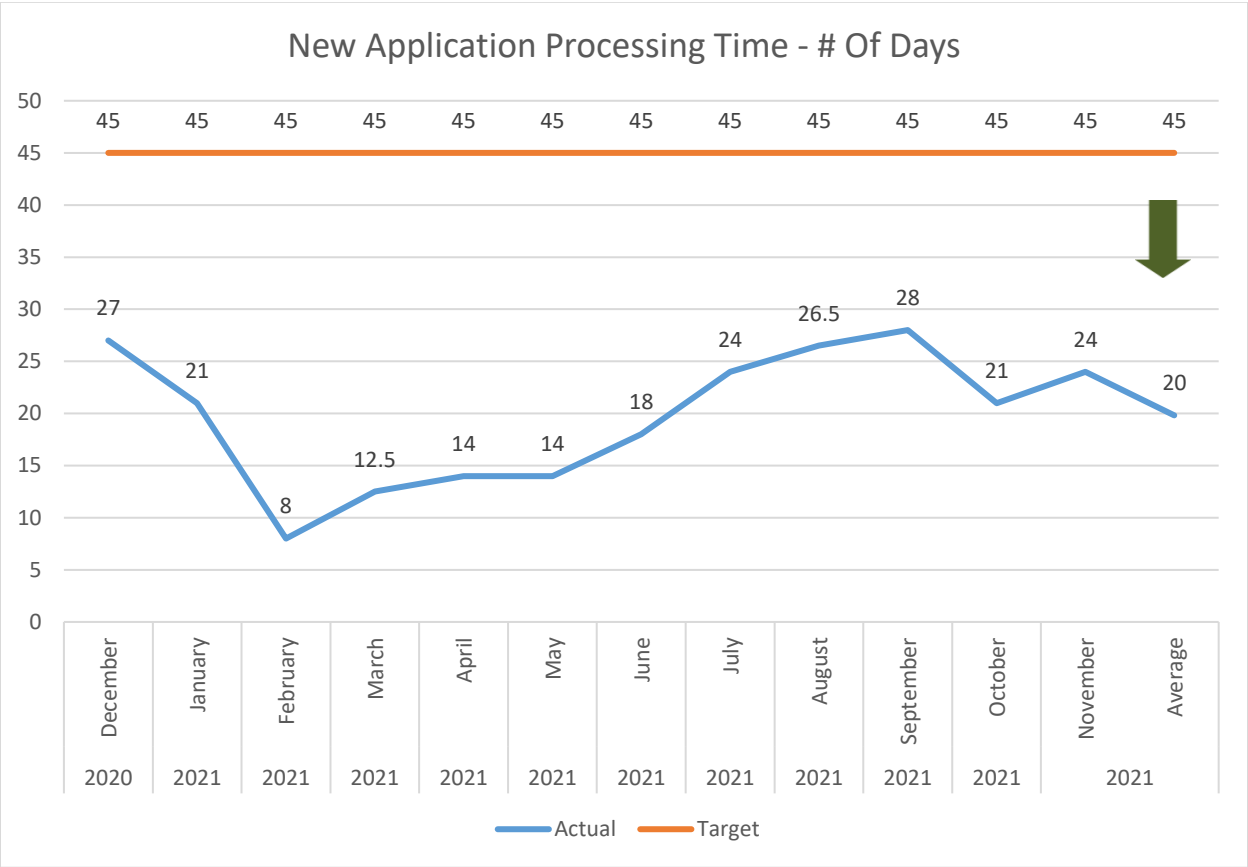


FIGURE 9: RECERTIFICATION PROCESSING TIME

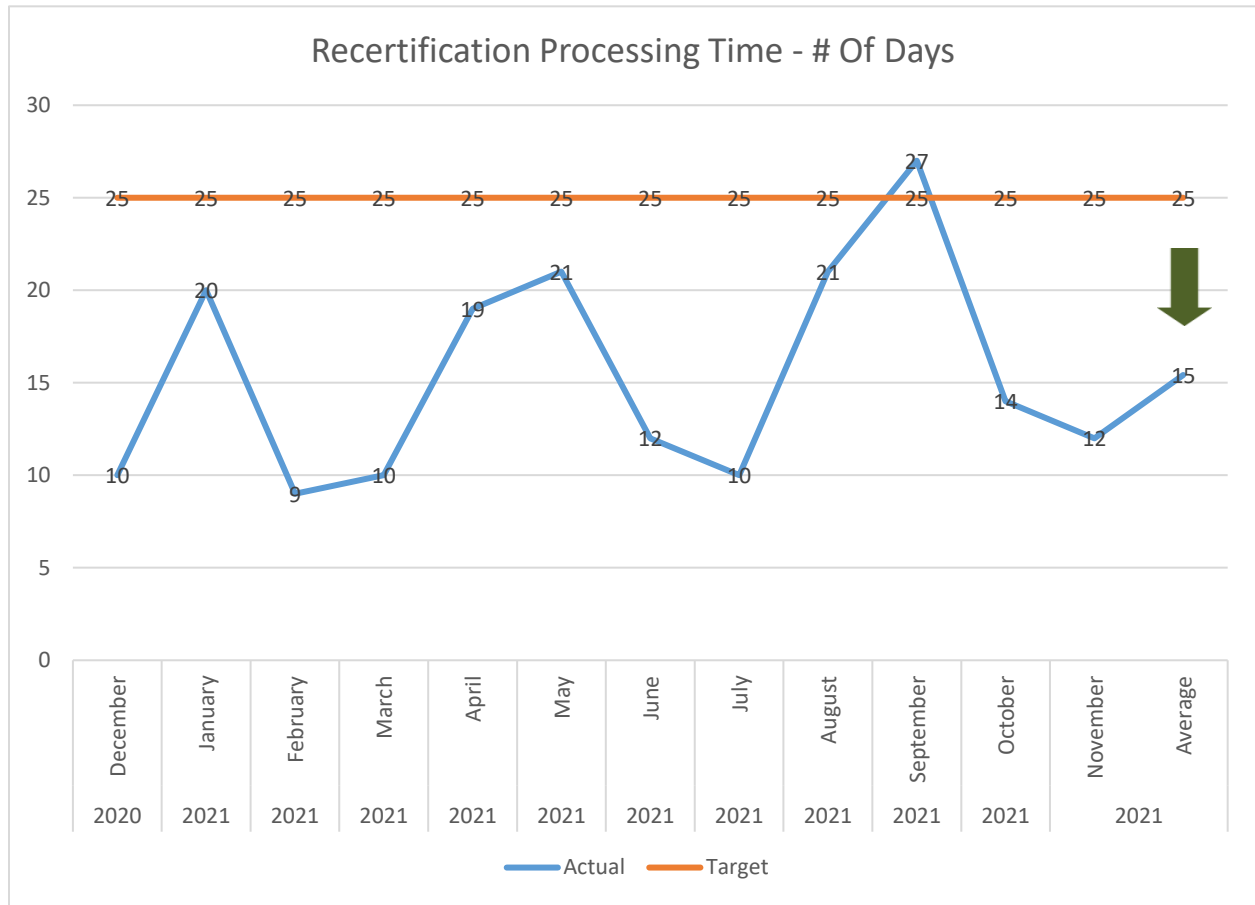


FIGURE 10: AVERAGE WAIT TIME BEFORE CALL IS ANSWERED

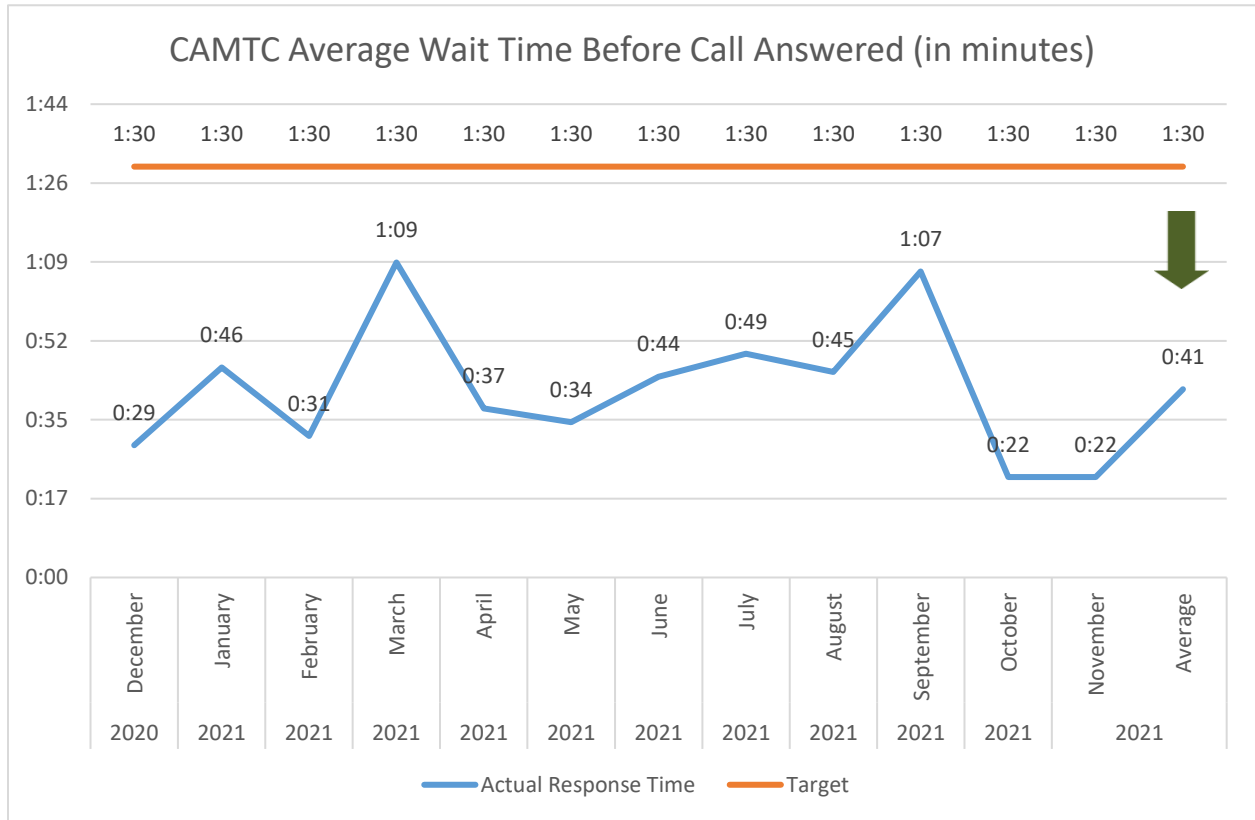
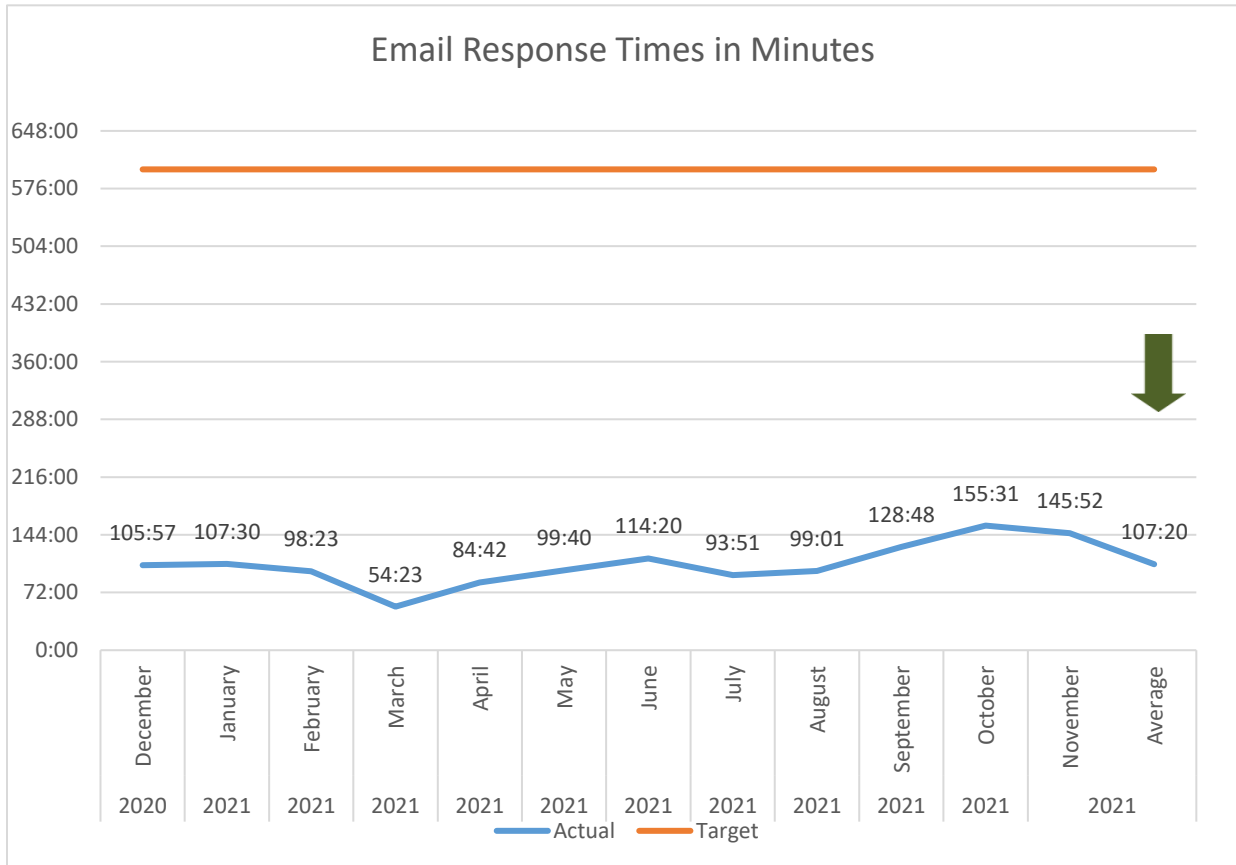


FIGURE 10: EMAIL RESPONSE TIME



Additional Observations

After having completed eleven fee studies for various boards and bureaus of the Department of Consumer Affairs, we find several similarities between them:

1. It can be challenging to charge fees that cover the cost of their operations.
2. The State Legislature frequently will add to their regulatory mandate but withhold the approval to raise fees to recover the cost.
3. It is not unusual for us to find organizations that have not raised fees for 10-20 years. The result is drawing down reserve funds, borrowing from other boards, and the inability to keep pace with the technical opportunities to improve client services. In one such case, we discovered a phone system dropping 1000 calls a day because it was technically incapable of handling the number of calls coming into the system.
4. There is an inherent tension between their consumer protection mission while also operating under the APA. Perhaps the most telling of this tension is a story published by the Fresno Bee ¹¹about a cardiologist accused of a fatal hit-and-run. The Medical Board of California attempted to restrict his medical license in response. However, the request was denied by a Fresno County judge. On a similar note, Mr. Jeffrey Rosen, District Attorney of Santa Clara County, in a letter to the Honorable Richard Roth, Chair of the Senate Committee on Business, Professions, and Economic Development, echoed a comparable sentiment when he stated: "a licensing process ... will prove prohibitively expensive, onerous, ponderous, ineffective, and leave vulnerable individuals subject to greater exploitation."¹²

It goes beyond this project's scope to determine if a certifying organization or a licensing organization would best serve the needs of California consumers. However, we note that CAMTC can process applications and investigate complaints faster and cheaper than a licensing board. From our observation, this has three benefits.

- 1) It keeps costs low for massage therapists, who operate on the low end of the economic ladder for medically related professionals.
- 2) Discipline, based on the "preponderance of evidence," allows for faster action against those who violate professional standards. The result of which is better protection of

¹¹ CA board loses bid to restrict medical license of doctor accused of fatal hit-and-run, January 13, 2022, By Robert Rodriguez

¹² Letter dated November 2, 2021

the consumer. According to a recent LA Times article¹³, this is the standard in 41 States.

- 3) The same standard of the "preponderance of evidence" also protects the industry. When those who violate professional standards are quickly removed from practice, the industry's integrity is strengthened.

¹³ State Medical Board seeks far-reaching reforms to discipline bad doctors, Jan. 7, 2022, Melody Gutierrez, Brittney Mejia, Jack Dolan, Kim Christensen



Strategic Priorities 2021

Approved October 1, 2020

1. **Sunset Review:** In preparation for the 2021 Sunset review, prioritize all organizational functions for a successful outcome for the Sunset review. Specifically, the continuation of CAMTC as a nonprofit organization, implementing a state-wide voluntary certification program for massage professionals and approval of educational programs. Sunset review shall be the highest priority for CAMTC in 2021. Whenever Sunset review is inconsistent with other interests sought to be promoted, Sunset review shall be paramount.
2. **Local Government:** Contact all city and county elected officials to offer assistance to update their ordinances to reflect current state law.
3. **Protection public health and safety:** Prevent infectious disease transmission by furthering the collaboration and coordination with State, county, and city health officers, code enforcement and law enforcement.
4. **Survey:** Conduct a survey of CAMTC certificate holders and approved schools to determine if there is a practice, policy, and/or procedure the Board should implement or revise to better serve their needs as Certificate holders and schools.



Summary of Certificate Holder Input for Potential Board Policy Discussions

Most of the input focused on additional education and outreach.

1. Certificate Holders have requested additional education of the public and the profession regarding sexual misconduct by clients

- Certificate Holders
 - What they can do to address clients that ask for sexual services or are inappropriate with them
 - Their rights as a massage professional in relation to client conduct
 - How to recognize inappropriate client behavior and set professional boundaries for themselves and the client
- Public
 - How to know a massage establishment is legitimate
 - What to expect from a massage – what is normal and appropriate and what isn't
 - Inappropriate client behavior during a massage – what not to do

2. Certificate Holders have also requested additional education of the public regarding what are appropriate massage practices

- Board approved water-based modalities
- Scientific manipulation of soft tissues (definition of massage in the Massage Therapy Act)

3. Certificate Holders have also requested guidance on how to engage and activate the profession to hold local government accountable

- How to increase local enforcement against illicit massage establishments
- Diminish the number of problem massage establishments
- How to get local government to engage in best practices related to illicit massage establishments

PERFORMANCE METRICS –2021

PM1 – VOLUME

TOTAL NUMBER OF COMPLAINTS RECEIVED – ALL (actionable and non-actionable)

FIRST QUARTER 2021: 34 complaints received on average per month.

SECOND QUARTER 2021: 27 complaints received on average per month.

THIRD QUARTER 2021: 39 complaints received on average per month.

FOURTH QUARTER 2021: 26 complaints received on average per month.

PM1.1 – VOLUME – CERTIFICATE HOLDERS

TOTAL NUMBER OF COMPLAINTS RECEIVED AGAINST CERTIFICATE HOLDERS

FIRST QUARTER 2021: 16 complaints against certificate holders received on average per month.

SECOND QUARTER 2021: 15 complaints against certificate holders received on average per month.

THIRD QUARTER 2021: 22 complaints against certificate holders received on average per month.

FOURTH QUARTER 2021: 13 complaints against certificate holders received on average per month.

PM 1.2 – VOLUME – CERTIFICATE HOLDERS – COMPLAINTS FROM LAW ENFORCEMENT

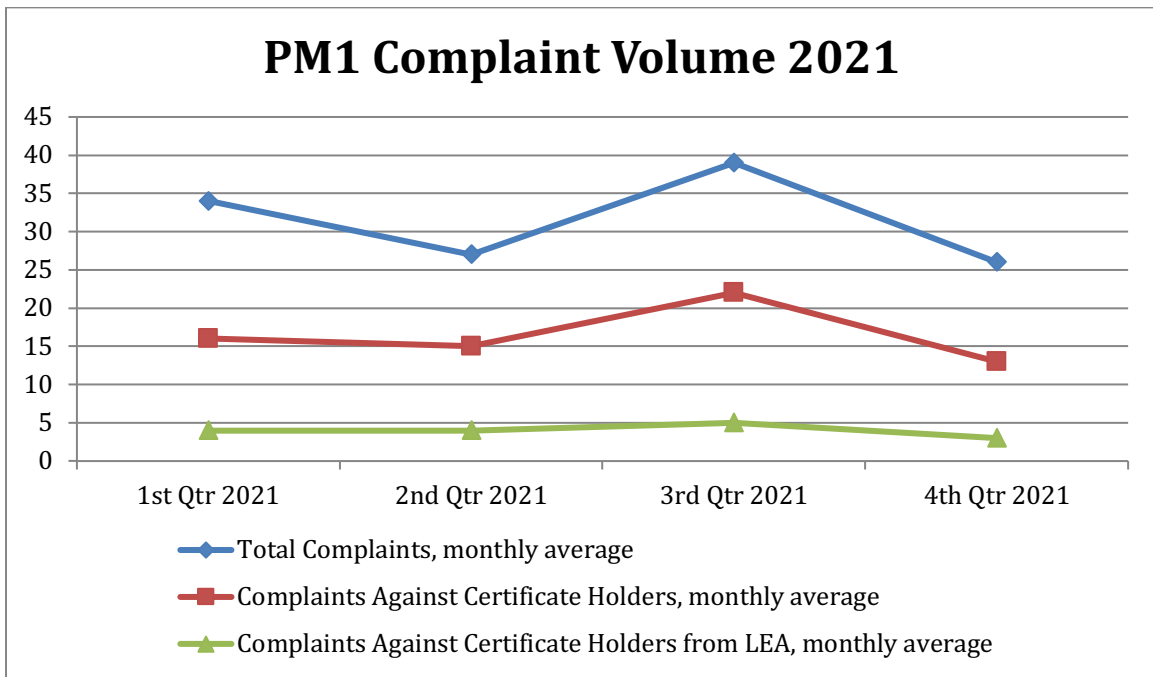
Total number of complaints received against certificate holders from law enforcement agencies or government agencies with the responsibility to regulate massage. Does not include complaints against those who are not certified.

FIRST QUARTER 2021: 4 complaints from LEA received against certificate holders on average per month.

SECOND QUARTER 2021: 4 complaints from LEA received against certificate holders on average per month.

THIRD QUARTER 2021: 5 complaints from LEA received against certificate holders on average per month.

FOURTH QUARTER 2021: 3 complaints from LEA received against certificate holders on average per month.



PM2 – INTAKE – ALL COMPLAINTS

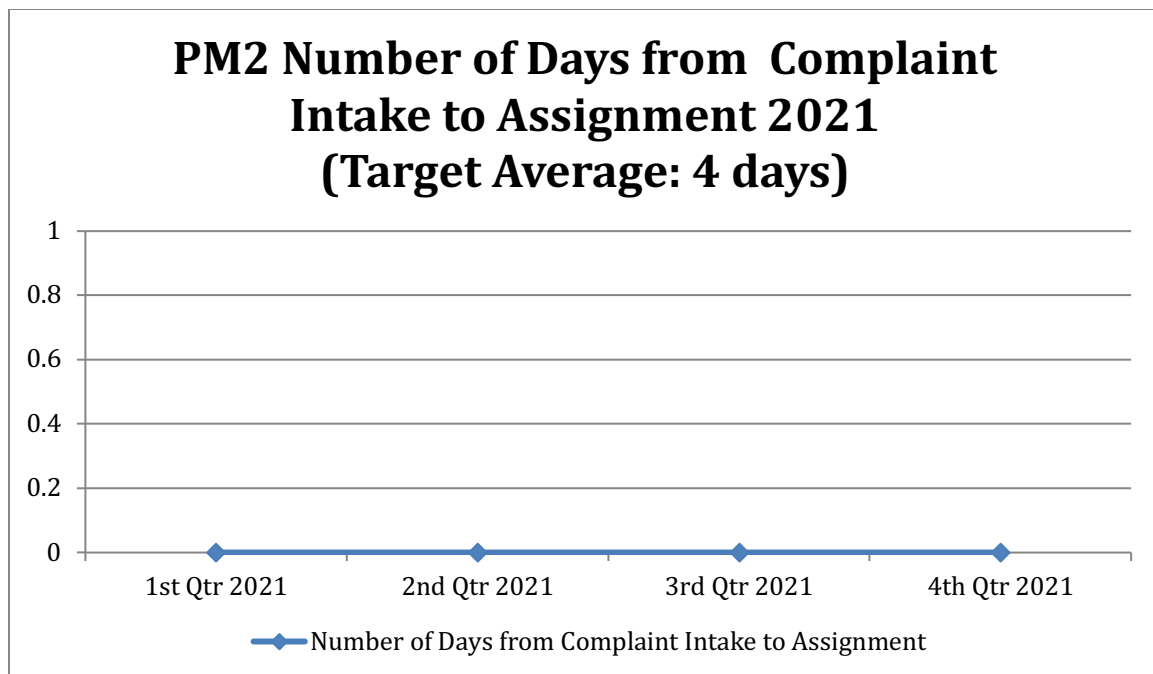
Number of days from when a complaint is received to when it is sent to an investigator. All complaints received are immediately forwarded to an investigator.

FIRST QUARTER 2021: 0 days to assignment.

SECOND QUARTER 2021: 0 days to assignment.

THIRD QUARTER 2021: 0 days to assignment.

FOURTH QUARTER 2021: 0 days to assignment.



PM3 – INTAKE AND INVESTIGATION

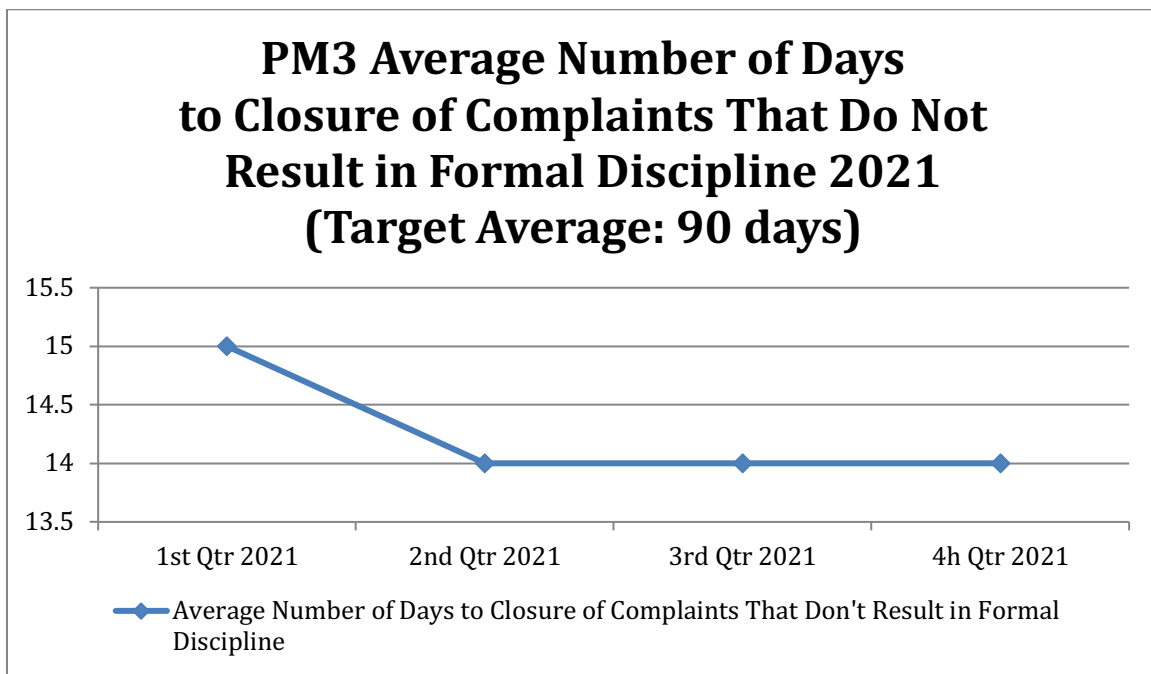
Average time in days from date complaint was received to date complaint was resolved/closure of the investigation process. This number includes ALL complaints, not just those against Certificate Holders, which are resolved prior to being referred to Legal for formal discipline. It does NOT include cases against certificate holders sent to Legal for formal discipline (proposed revocation, suspension, or imposition of probationary conditions).

FIRST QUARTER 2021 (54 complaints resolved): 15 days is the average number of days to closure.

SECOND QUARTER 2021 (40 complaints resolved): 14 days is the average number of days to closure.

THIRD QUARTER 2021 (66 complaints resolved): 14 days is the average number of days to closure.

FOURTH QUARTER 2021 (20 complaints resolved): 14 days is the average number of days to closure.



PM4 – FORMAL DISCIPLINE AGAINST CERTIFICATE HOLDERS

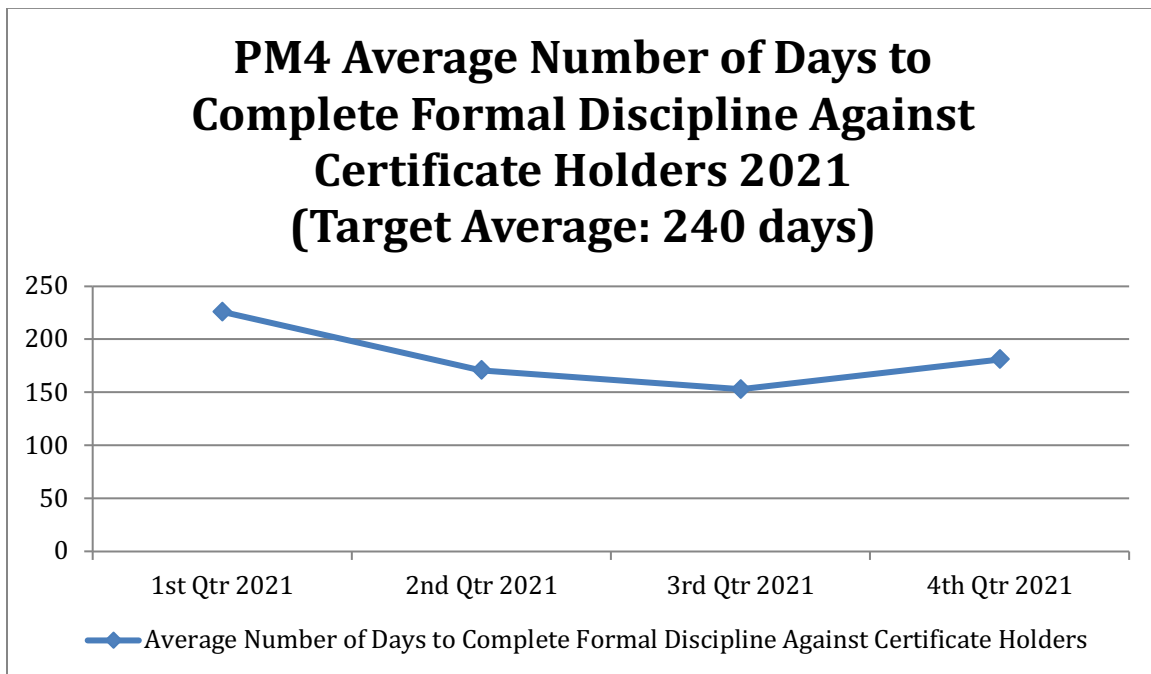
Average number of days to complete the entire disciplinary process against certificate holders for cases resulting in formal discipline by CAMTC. Formal discipline includes permanent revocation, revocation, suspension, and imposition of probationary conditions. Average number of days is calculated from date of intake to final date of disciplinary action.

FIRST QUARTER 2021 (70 actions): 226 days is the average number of days from intake to final date of formal discipline.

SECOND QUARTER 2021 (52 actions): 171 days is the average number of days from intake to final date of formal discipline.

THIRD QUARTER 2021 (49 actions): 153 days is the average number of days from intake to final date of formal discipline.

FOURTH QUARTER 2021 (56 actions): 181 days is the average number of days from intake to final date of formal discipline.



CAMTC Bank Account Summary
As of 1/31/2022

	Bank	Type	Term	Maturity Date	Rate	Value	% of Portfolio	Valuation Date
1	Umpqua Bank	Checking	NA	NA	0.000%	767,225.56	23.1%	1/31/2022
2	State Farm Bank/US Bank	CD	36 Mos	11/26/2023	1.440%	273,629.14	8.2%	1/31/2022
3	Centennial Bank/Giant Bank	CD	36 Mos	11/26/2023	1.550%	250,000.00	7.5%	12/31/2021
4	EH National Bank	CD	24 Mos	12/5/2022	1.120%	273,795.42	8.2%	12/31/2021
5	First Internet Bank of Indiana	CD	24 Mos	12/7/2022	1.900%	250,148.64	7.5%	1/31/2022
6	Golden State Bank	MM	NA	NA	1.500%	3,171.38	0.1%	1/31/2022
7	CDARS 01-032620 - Genesee Regional Bank	CDARS	1 mo	2/24/2022	0.010%	9,196.17	0.3%	1/27/2022
8	CDARS 01-032620 - TIB The Independent BankersBank NA	CDARS	1 mo	2/24/2022	0.010%	248,500.00	7.5%	1/27/2022
9	CDARS 01-032620 - United Community Bank	CDARS	1 mo	2/24/2022	0.010%	243,896.28	7.3%	1/27/2022
10	CDARS 02-061120 - First Century Bank	CDARS	1 mo	2/17/2022	0.010%	248,500.00	7.5%	1/20/2022
11	CDARS 02-061120 - First National Bank	CDARS	1 mo	2/17/2022	0.010%	17.27	0.0%	1/20/2022
12	CDARS 02-061120 - Gorham Savings Bank	CDARS	1 mo	2/17/2022	0.010%	248,500.00	7.5%	1/20/2022
13	CDARS 02-061120 - Liberty Savings Bank, F.S.B.	CDARS	1 mo	2/17/2022	0.010%	248,500.00	7.5%	1/20/2022
14	CDARS 02-061120 - United Community Bank	CDARS	1 mo	2/17/2022	0.010%	4,603.72	0.1%	1/20/2022
15	CDARS 03-110421 - Bank of America, N.A.	CDARS	1 mo	2/24/2022	0.010%	248,500.00	7.5%	1/27/2022
16	CDARS 03-110421 - Genesee Regional Bank	CDARS	1 mo	2/24/2022	0.010%	1,505.76	0.0%	1/27/2022
						<u>3,319,689.34</u>		

Treasurer's Report, January 31, 2022

Board Meeting: April 12, 2022

Applications Received and Re-Certifications Billed

The Shelter-in-Place/Lockdown requirements in California varied by locality; however, in most of the state, massage facilities were closed for the greater part of 2020. By February 2021, facilities in most of the state were allowed to re-open and therapists were allowed to practice, albeit with strict safety protocols.

This report looks at CAMTC's position on January 31, 2022, approximately 12 months after the re-opening. However, to provide some perspective on the effect of the lockdown period on CAMTC, comparable data are shown for the 12-month period ending January 31, 2021. This latter period includes many of the months when restrictions on therapists were in place.

Perhaps counter-intuitively, the differences between the two periods are not as pronounced as one might have expected.

The Number of Certificate Holders

In recent years, the average number of Certificate Holders has been fairly constant, at about 50,000 or slightly above. On January 31, 2022, that number, at 49,759, was at the low end of that range. On January 31, 2021, the number of Certificate Holders was 50,150, virtually the same number. Given the turmoil for massage therapists and businesses, the similarity in the number of Certificate Holders is not what might have been expected.

At the time of the previous Treasurer's Report, covering the period ending September 2021, an informal survey of some massage facility owners suggested that there was not a sufficient number of therapists to meet the demand. At the time covered in this report, the shortage, for the most part, appears to have lessened.

What this declining shortage suggests is that despite the fact that the number of Certificate Holders has been virtually unchanged, many may not have been working during the previous months and may now be re-entering the market.

The following table shows the number of Certificate Holders on January 31 of 2022 and 2021.

31-Jan	NUMBER OF CERTIFICATE HOLDERS
2022	49,759
2021	50,150

New Applications and Re-Certifications

New Applications account for a fairly small share of Certificate Holders. Nevertheless, they are an important segment since they are needed replace therapists who leave the category.

The number of New Applications has followed no consistent pattern during the last few years, possibly because it is more sensitive to the overall demand for therapists. Since New Applications accounts for a small share of all Certified Therapists, small increases in total demand can result in large variation in the absolute number for this segment. For example, if there is a variation of several hundred in the number of Re-Certifications, that is not noteworthy; but that same variation in New Applicants represents a meaningful change.

The number of New Applications, at 3,906 for the 12 months ending January 31, 2022 is up 17% from the comparable period ending January 31, 2021. However, it is not outside the general range of people entering this field during the past few years.

When one examines the numbers of New Applicants by month for the two twelve-month periods, no obvious relationship exists between those numbers and when restrictions were imposed and lifted. Factors such as geographic variation in lockdowns or regulations related to school closings, concerns about Omicron, etc. may contribute to the absence of any clear patterns.

New Applications, January 31 and Preceding 11 Months		
	Jan. 2022 Most Recent Month Shown	Jan 2021 Most Recent Month Shown
January	261	192
December	367	308
November	321	381
October	331	383
September	337	310
August	353	234
July	356	218
June	290	225
May	307	228
April	397	154
March	350	361
February	236	349
Total	3906	3,343

Re-Certifications Billed for the 12 months ended January 31, 2022 were 25,968, up slightly, 3%, from 25,327 for the comparable period ending January 31, 2021. However, the number of Recertifications Billed is not related to current demand, it reflects the number of Certified Therapists whose certifications need to be renewed. The main point of these figures is to demonstrate the importance of obtaining renewals. Recertifications Billed accounts, historically, for about 87% of the combined New Applications received plus Recertifications Billed.

New Applications and Recertifications Billed				
12 Months Ending January 31	New Applications Received	Re- Certifications Billed	Total	Re- Certifications as a % of Total
2022	3,906	25,968	29,874	87%
2021	3,343	25,327	28,670	88%

As was the case through September of 2020, Re-Certifications accounted for 87% of the total activity.

Although the number of Re-Certifications *billed* in the two periods were similar, an important measure is how many of those bills were *paid*. On this measure, we see an important difference between the 12 months ended on January 31, 2022 and on January 31, 2021. In recent years, close to 90% of those billed re-certify. For the more recent of the two periods, it was at that norm, 87%, compared to just 78% for the preceding one.

Recertifications Paid			
12 Months Ending January 31	Recertifications Billed	Recertifications Paid	% Billed That Are Paid
2022	25,968	22,633	87%
2021	25,327	19,834	78%

What It All Might Mean

The relationships between the number of Active Certificate Holders during and after the pandemic is less clear than might have been anticipated. Even so, some patterns have emerged:

- The total number of Active Certificate Holders has remained fairly constant. However, this consistency is due to an increase in New Applications in the current period offsetting the decline in the share of Recertifications Billed that were paid during the Covid period.
- A likely reason that so many therapists retained their certification, even when they were not working, is that the cost of doing so is not great and the possibility that starting the certification process over would be difficult or that more restrictive conditions would be in place.
- Even though the number of Active Certificate Holders changed little, an informal survey with some massage facility owners indicates that many of those therapists were not working and have now either returned to work or are working more hours.

- Processing and approval of applications is taking longer than has been the case in the recent past.

Financial Statements

Statement of Functional Activities (Income Statement)

Overview: Revenue, Expenses, and Net Income Relative to Budget and Prior Year

For January 2022, Revenue was up 20% from the comparable year-ago month while Expenses increased at an even greater rate, 36%. The net effect was a decline of 25% in Net Income from a year-ago.

- The Revenue increase from a year-ago can be explained in large part by the greater increases in Current Year Recertification Fees and School Application Fees.
- The increase in Expenses is explained, in large part, by two items: Application Processing and Miscellaneous. Each of these accounts made up 35% of the substantial increase in Expenses. The jump in Application Fees is out of proportion to the increase in applications, while the Miscellaneous account might more clearly identify the larger charges that contributed to the total. However, comparisons made between short periods, such as one month, can often be misleading and are offset by compensating reductions in subsequent months.

Relative to Budget, actual revenue was 41% higher while actual expenses were 6% lower. As a result, Net Income, at \$96,019, was substantially above the budgeted loss of \$111,971 for February 2022.

SUMMARY OF FUNCTIONAL ACTIVITIES					
Fiscal Year Ending January 31					
	2022		2021		Change in Actual 2022 from 2021
	Actual	Budget	Actual	Budget	
Total Revenue	\$595,925	\$424,970	\$494,803	\$450,711	20.4%

Total Expenses	\$499,906	\$533,907	\$367,177	\$459,479	36.1%
Net Income	\$96,019	(\$111,977)	\$127,626	(\$8,768)	-24.8%

The following sections discuss Revenues and Expenses both in absolute terms and relative to the Budget.

Revenue Detail

Total Revenue is, as noted, 41% above Budget. The majority of the difference is explained by greater than budgeted Current Year Re-Certifications.

Re-Certifications – CY (Current Year) accounts for 73% of Total Revenue for January, with *New Certification Fees* – CY adding an additional 8%.

REVENUE JANUARY 2022			
	Actual	% of Total	Actual as a % of Budget
CERTIFICATION FEES			
New Certification Fees - CY	\$48,807	8.2%	80%
New Certification Fees - PY	\$2,733	0.5%	100%
Re-Certifications - CY	\$431,970	72.5%	157%
Re-Certifications - PY	\$28,101	4.7%	100%
Recertification Late Fees	\$20,810	3.5%	213%
TOTAL CERTIFICATION FEES - INDIVIDUAL	\$532,421	89.3%	141%
Hearing Fees - Individuals	\$4,140	0.7%	116%
School Application Fees -	\$30,293	5.1%	266%
School Background Check Fees	\$3,198	0.5%	308%
School Hearing Fees	\$0	0.0%	0%
Interest and Other Income	\$409	0.1%	15%
Miscellaneous Fees	\$25,465	4.3%	123%
PPP Grant	\$0	0.0%	0%
TOTAL REVENUE	\$595,925	100.0%	141%

Expense Detail

Expenses were 6% below Budget.

CAMTC categorizes expenses into 37 accounts. Sixteen (16) of those 37 (including the Miscellaneous Contingencies account) make up 95% of the actual and 97% of budgeted expenses for January. These sixteen accounts (and one for Salaries of Hearing Officers, which is included in order to show Total Salaries) are shown in the table below in the order they are

listed in CAMTC's financial statements. Most of the accounts are at or a little below their budgeted amount, contributing to the total of Actual Expenses being six percentage points below Budget.

Application Processing accounted for 31% of Actual Expenses and is clearly the major expense category. Salaries of all employees combined, at 30%, was closely behind. Outside Legal, at 8%; Paralegals, 6%; and Legal-in-House, 5% make up 19% of all expenses.

EXPENSES JANUARY 2022

Account	Amount	% of Total	Actual as a % of Budget
Senior Management	\$45,205	9%	100%
Management	\$16,348	3%	100%
Outreach Director	\$6,706	1%	96%
Field Investigations	\$18,526	4%	100%
School Inspectors	\$10,555	2%	92%
Hearing Officers	\$360	0%	30%
Legal In-house	\$24,647	5%	99%
Paralegals	\$29,150	6%	83%
Total Salaries	\$151,498	30%	95%
Payroll Taxes	\$10,871	2%	100%
Benefits	\$17,698	4%	101%
Communications & Outreach	\$16,530	3%	100%
Banking/credit Card Fees	\$10,822	2%	101%
Certification/Mats/Print/Mail	\$9,558	2%	101%
Database Maintenance	\$9,748	2%	87%
Legal	\$39,453	8%	102%
Application Processing	\$155,791	31%	100%
Misc. Contingencies	\$52,715	11%	90%
Total of Above Expenses	\$474,684	95%	97%
TOTAL EXPENSES	\$499,906	100%	94%

Statement of Financial Position (Balance Sheet)

Overview

CAMTC is in a solid financial position despite the uncertainties during this Pandemic. In addition to a return to previous levels of New Applications and Paid Re-Certifications, the organization has benefited from the receipt of PPP funds in both 2021 and, to a lesser

extent, in 2020. Further, as CAMTC recognizes income from Certifications and Re-Certifications it is enjoying the results of the increased prices which are now charged. These revenue sources have added to CAMTC's healthy financial position even though the number of Active Certificate Holders has not grown.

- At \$3,899,342, on January 31, 2022, assets are up 29% from the comparable date in 2021. Assets are composed primarily of cash. Cash on hand, \$3,319,689, provides a strong reserve for any unanticipated contingencies; it is equal to over six months of budgeted expenses. The primary fixed asset is software.
- Liabilities are \$1,113,169, down almost one-quarter from 2021. However, these figures, without some explanation, do not provide a clear picture of CAMTC's obligations. Eighty percent (80%) of the Current Liabilities are deferred income from therapists and schools and will be reflected in revenue over time.
- Equity, at \$2,786,173, is strong; up 80% from the comparable period in 2021.

BALANCE SHEET, JANUARY 31			
	2022		2021
Assets			
Checking/Savings	\$3,319,689		\$2,924,272
Fixed	\$493,627		\$37,655
Other Assets	\$86,025		\$52,997
Total Assets	\$3,899,342		\$3,014,924
Liabilities			
Current	\$824,063		\$797,528
Long term	\$289,107		\$665,971
Total Liabilities	\$1,113,169		\$1,463,499
Equity	\$2,786,173		\$1,551,425
Total Liabilities and Equity	\$3,899,342		\$3,014,924

Conclusions

- CAMTC is in a strong financial position. Assets are equal to over six months of budgeted expenses.

- The number of Active Certificate Holders both now and during the Pandemic is at or near pre-Pandemic levels. Even so, as businesses began to re-open, there was difficulty hiring sufficient therapists to meet the demand. Although that therapist shortage has, for the most part, now abated, the pattern suggests that most therapists felt it was important to retain their certification even during the periods when they were not working.
- An encouraging sign is that New Applications are within the levels reported in the past. Since the long-term strength of the industry requires that new people enter the profession in numbers at least equal to those leaving, New Applicants is a category that should be watched closely.
- Revenue is up for the month of January 2022, from the comparable month a year-ago. However, costs were up disproportionately.

Respectfully submitted by
Michael Marylander,
Treasurer
April 5, 2022



To: CAMTC Board of Directors

From: Beverly May, Director of Governmental Affairs and Human Trafficking

RE: Board Meeting April 12, 2022

Local Ordinances:

Since the last Board meeting, I have completed all the requests for review of local massage ordinances that resulted from CAMTC's outreach to city managers late last year.

I have found many cities have been easing their zoning and establishment fees as they commit to ongoing enforcement and when applicable, coordinating with CAMTC to close the illicit establishments. When I engage with a city, I now discuss both their establishment permit fees, if any, and zoning. I see progress as local jurisdictions make them less restrictive. Citizens can always challenge any local fees, including establishment permit fees that by state law can be no more than enough to cover cost. The city should provide a cost study upon request to justify the costs. Often people conflate the business license, which is a tax, with massage business/establishment permit fees. Business licenses as a tax are set by the city council in some cases requiring voter approval to increase.

Although land use (zoning) and massage business regulations are under local control, subject to some limitations that CAMTC secured in the Massage Therapy Act, more and more local officials are open to easing provisions that are unnecessary burdens on the legitimate profession. In some case it is a matter of educating the officials and offering alternatives. I recently helped a massage therapist trying to open a mobile massage business out of a home office. The city first said that they prohibited mobile massage, then that CAMTC prohibited it due to COVID. After reviewing the ordinance, it was clear that the city staff was misinformed, and in addition the ordinance is almost 40 years old. I provided the massage therapist with accurate information and referred her to my contact in the city. The outcome is that she now can operate her business, and the city intends to update their ordinance.

Although many cities and counties have preferred to replace their mandatory massage permits and instead mandate certification, I have written previously of

some that prefer to leave the choice to the massage therapists. Palo Alto and San Diego are two cities that have left the choice of whether to certify to the profession with no resulting problems.

State legislation:

Typically I track a number of bills, some specific to massage, human trafficking or indicating a trend in leanings of the legislature.

Human Trafficking:

Rick McElroy and I continue to participate in Human Trafficking coalitions and taskforces. Lately there is less direct focus on massage but it certainly is not off their radar. In fact, although not in California, the Colorado House just passed HB 1300 with bi-partisan support and is now in the state Senate. Colorado licenses massage therapists. This bill will authorize counties to regulate massage establishments, an authority that cities already have. HB 1300 allows CO. counties to “adopt a local resolution or ordinance to establish business licensure requirements to regulate massage facilities for the *sole purpose of deterring illicit massage businesses and preventing human trafficking*. The bill allows the board to charge an administrative licensure fee for a massage facility. The bill allows a board to adopt a resolution or ordinance to regulate and prohibit activities to prevent the operation of illicit massage businesses that engage in human trafficking-related offenses.”

New York State is now considering a bill to no longer have practicing massage without a license be a crime, presumably to protect victims that are often undocumented, don't speak English and will not qualify for a state license. I wonder how those graduating from 1,000 hour massage programs, passing the state licensing exam and taking continuing education classes annually feel about competing with untrained, unlicensed people that will not be prosecuted, nor, in many cases, protected from their traffickers.



To: The CAMTC Board of Directors
From: Jon Walters, Director of Operations

Operations Report

April 12, 2022

Overview

The California Massage Therapy Council's (CAMTC) Operations division has continued to maintain its primary objectives, weathering both the Delta and Omicron waves of the COVID-19 pandemic with excellent performance.

The team is using the current reduction in high-impact pandemic effects after two years of contingency operations to engage in recovery actions, reassignment, resupply, and training while seeking readiness for the next challenge, in addition to maintaining regular certification, background review support and customer service processes and service levels. COVID impacts were directly experienced by the team and their households during the last two quarters at a level higher than at any time in the last two years, and were rapidly compensated for and resolved, with the team outperforming even the best of circumstantial expectations.

Technologies and collaborations utilized and implemented out of creativity and necessity to continue efficient functioning during the pandemic have in some cases been adopted for the long-term, including CAMTC's ability to accommodate electronic transcripts, enhance the use of cloud-based applications, and improve payment workflows and security while eliminating all phone and mail payments.

A backup system to generate CAMTC ID cards was brought online in March, providing a fallback position in case of the need for maintenance or a malfunction with the primary hardware. Several team-members have been cross-trained in the credential production process, further increasing redundancy and flexibility.

New Applications & Certificates

In March 2022, the median number of days to process new applications with no background or education issues was 9 days (see attached chart; goal = 45-day median or less).

Recertifications

The median number of days to approve eligible recertification applications with no background issues in March 2022 was 16 days (see attached chart; goal = 25-day median or less).

Every two years there are several cyclical spikes (up to 42% above average) in recertification activity due to clusters of massage therapists' certificates expiring in the same month(s), which triggers correlated pre-expiration volume increases in application submission. One of these spikes coincided with the 2021 holiday season and Omicron, and was handled with grace by the processing team during remote operations.

Customer Service & Phone Calls

The average wait time to answer by a live agent in March 2022 was 32 seconds (see attached chart; goal = 90 second average or less). Customer Service again beat their own goals (as they have done for years now). Team assignments have been revised while staying flexible enough to adjust to the rising and falling waves of calls that are heavily affected by current events. State verifications, contact information updates, returned mail handling, correspondence, special projects and outbound call support for

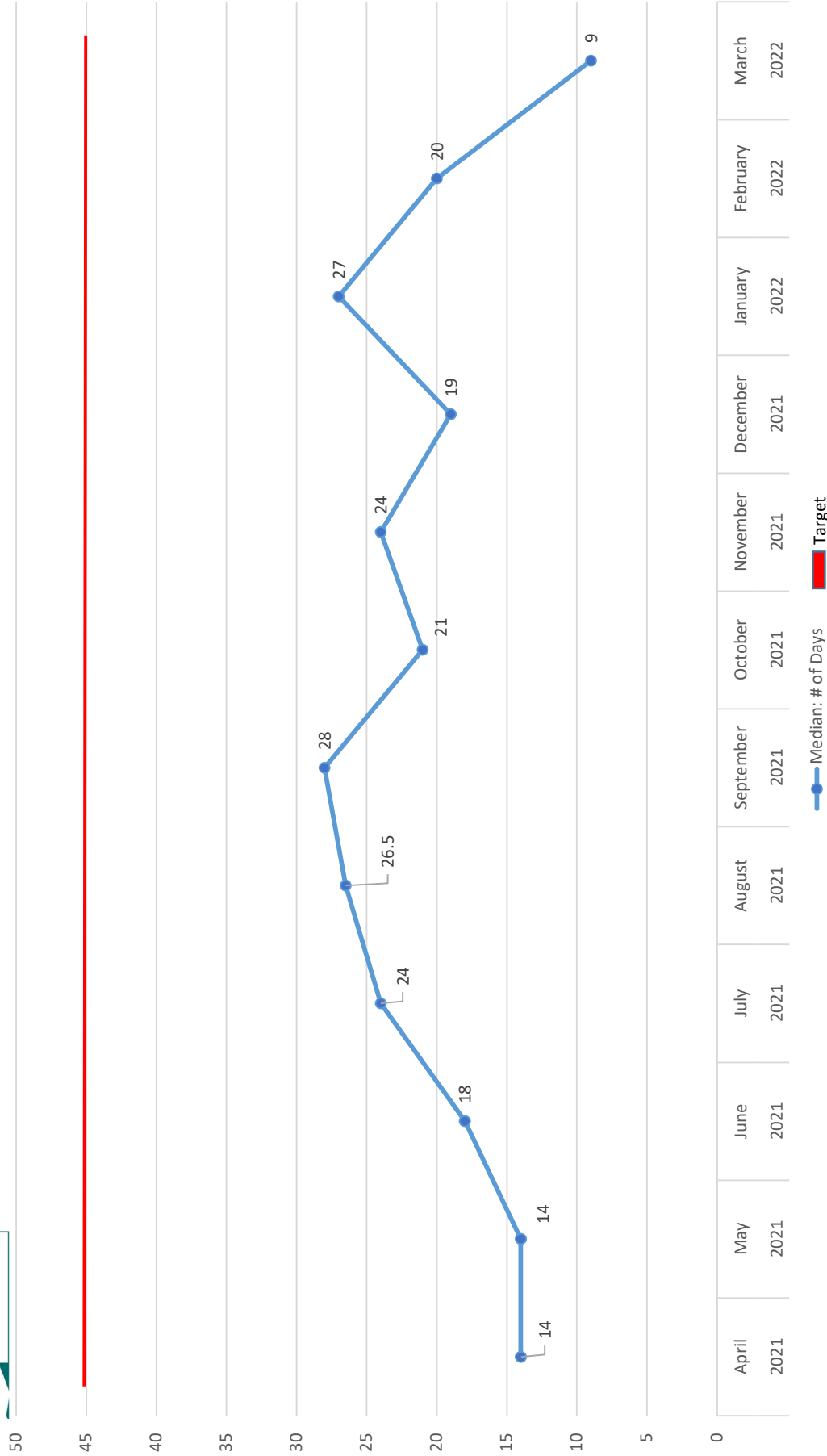
the application processing team are all examples of service and value enhanced by Customer Service, in addition to their handling of the thousands of inbound calls received monthly.

Correspondence

In March 2022, the average response time was less than two hours at 108 minutes (see attached chart; goal = less than 10 business hours – aka 1 business day). Inbound email activity to CAMTC's service addresses remains elevated, with the most recent 22 months measured showing a 73% volume increase compared to the 22 months prior to and ending with the onset of the pandemic in March 2020. In spite of this increase, the team has shifted to maintain service levels in support of applicants, certificate holders and their inquiries as they leaned more towards email communications.

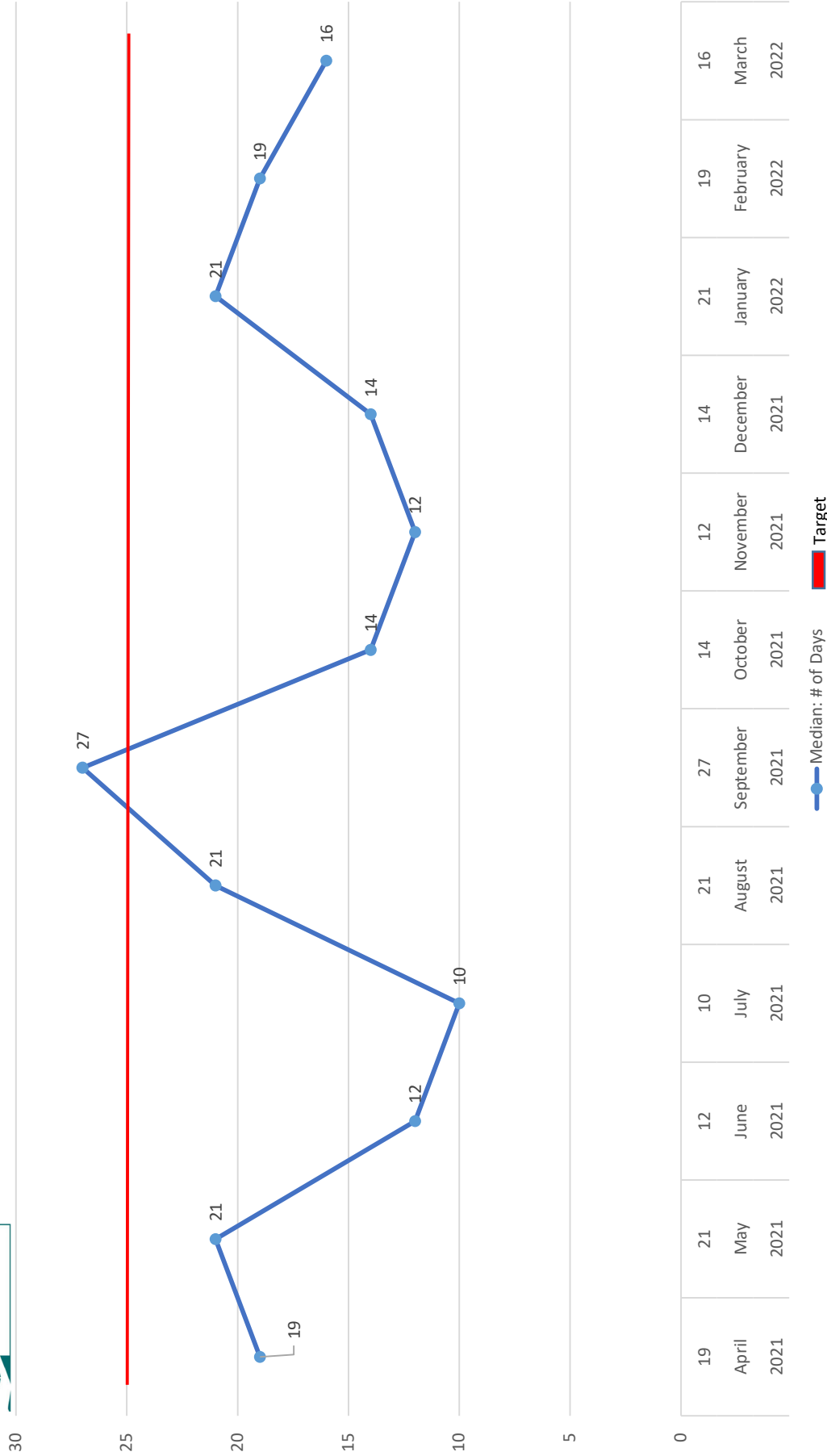


CAMTC Median Processing Time - New Applications with No Background or Education Issues



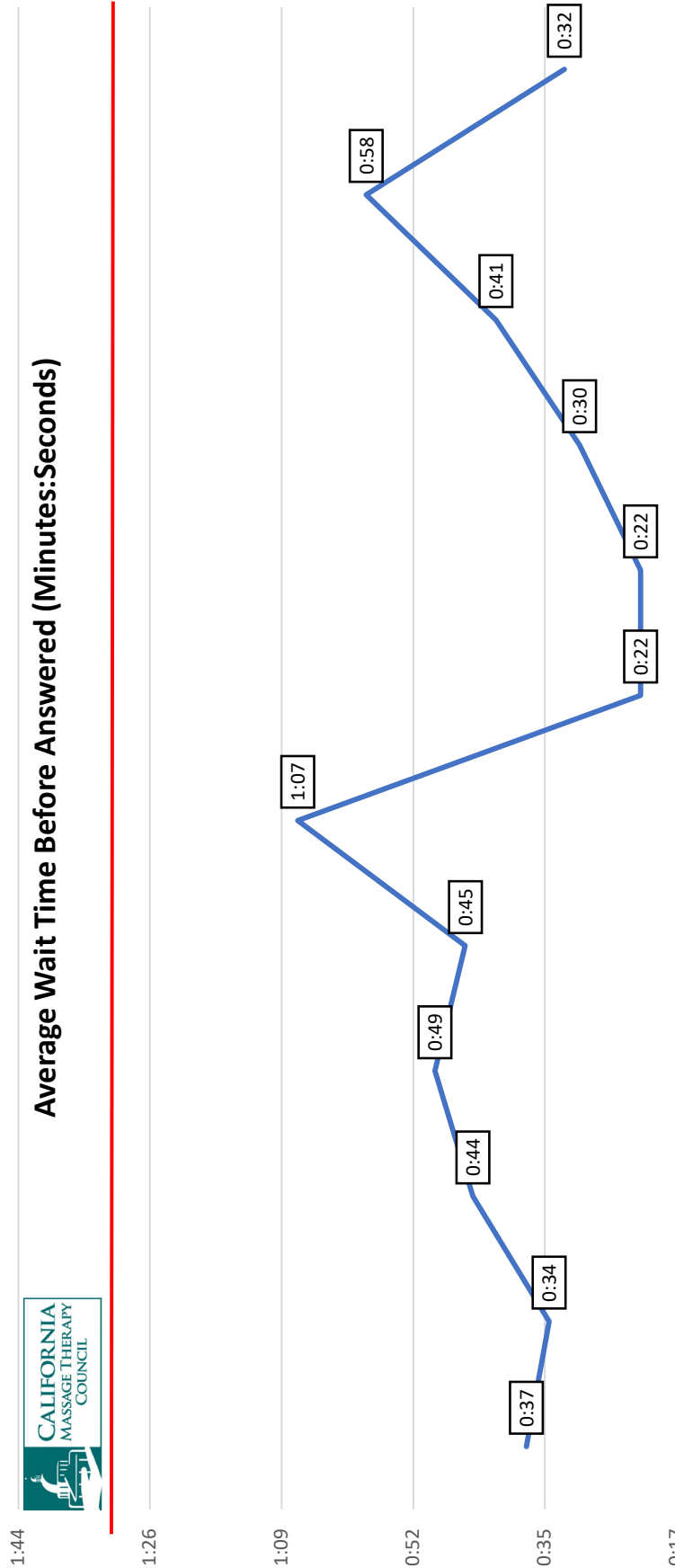


CAMTC Median Processing Time - Recertification Applications with No Background Issues





Average Wait Time Before Answered (Minutes:Seconds)



April	May	June	July	August	September	October	November	December	January	February	March
2021	2021	2021	2021	2021	2021	2021	2021	2021	2022	2022	2022

Series1

Target



Average Email Response Time (Minutes:Seconds)
info@camtc.org & cs@camtc.org

720:00

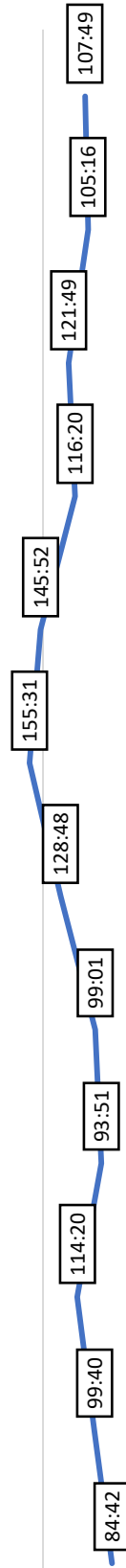
576:00

432:00

288:00

144:00

0:00



Application processing and customer service emails.

Series1

Target



CALIFORNIA MASSAGE THERAPY COUNCIL

One Capitol Mall, Suite 800 | Sacramento, CA 95814
tel 916.669.5336 fax 916.669.5337 www.camtc.org

TO: CAMTC Board of Directors

FROM: Joe Bob Smith, Director, Educational Standards Division

RE: Board Meeting – April 12, 2022

School Statutes Update

It's been a busy start to 2022 for ESD. Of the 74 CAMTC Approved Schools, 44 have approvals expiring in 2022 with another 20 expiring in 2023. Additionally, there are four provisionally approved schools whose provisional approval expire in 2022. This means lots of re-approval applications to process and site visits to make.

Eighteen CAMTC Approved Schools opted to extend their current approvals for 182 days under the Board's limited-time financial relief opportunity that ended December 30, 2021. This pushed several of the school approvals expiring on June 30, 2022, until the end of the year, and pushed later ones into 2023. Additionally, three schools that have received re-approvals so far opted for the 2-year re-approval period as opposed to the standard 4-year.

School Outreach

Monthly Schools Conference Calls: These regular calls continue to see high participation. They provide an excellent opportunity to share updates and to hear issues from schools.

Schools Newsletter: No newsletter was published after the December 16, 2021, board meeting, as no action was taken that directly impacts schools.

AMTA School Summit: I attended the AMTA School Summit in San Antonio, TX, February 17-18. There I met with school regulatory agencies including FSMTB, COMTA, and the Texas Department of Licensing and Regulation. I also participated in several spirited discussions about the future of massage education post-pandemic and the impact of distance learning.

Looking Forward

2022 and 2023 will continue to max ESD's resources as noted above. Additionally, the number of education reviews (i.e., education from out-of-state, multiple schools, closed schools, etc.) remains high. In 2021, ESD completed over 1,700 education reviews. In Q1 2022, ESD has completed over 350. Most of these are out-of-state education. We continue to work with our national and state partners to find best practices to properly vet this education.



CALIFORNIA MASSAGE THERAPY COUNCIL

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To: CAMTC Board of Directors
From: Rick McElroy, Director of Law and Code Enforcement Relations
Re: Board Meeting – April 12, 2022

Zoom Meetings

Listed below are the zoom calls I attended during this reporting period. These Zoom meetings are a great opportunity to network. If there was a significant outcome of the meetings, I will report it separately.

- Heyrick Research
- San Diego Coalition against Human Trafficking
- San Mateo Coalition against Human Trafficking
- South Bay Coalition against Human Trafficking
- San Francisco Collaborative against Human Trafficking
- San Diego District Attorney

San Diego District Attorney's Office First Responders Training - April, 2022

CAMTC has been invited to this upcoming event to provide our 2-hour POST certified training to over 200+ first responders in the San Diego area, as well as Riverside and San Bernardino counties, on April 28, 2022. This is a one-day event and is being hosted by the San Diego District Attorney's office. This training has been moved to virtual and will be presented via Webex's virtual platform.

Police and Code Enforcement Training YTD

Training this year has pivoted entirely to Zoom. As much as I miss the personal contact with the attendees, Zoom offers a much broader range of coverage and it occurs every month. It makes it very easy for cops and code folks to pick a training date when it is convenient for them. In 2019, I trained 548 officers and 221 agencies. In 2021, I did two in-person trainings that totaled 50 attendees and 8 agencies. So, for the first 3 months of 2022, we have trained 58 attendees from 31 separate agencies. If this pace keeps up, we will quadruple our training efforts and agency contacts from 2021. An added benefit, travel funds are greatly reduced. The grand total since training started in 2014 has risen to 2,569 attendees and 842 agencies.

Monthly Zoom Training Survey

One new item I have implemented (with help from Stacy Morrison) is a 5-question survey asking attendees to critique the training. This survey is sent via email for each attendee to fill out. We have had very positive feedback, but only 15 out of 58 responded. I am attaching the survey to this report, as well as the survey results. We are working on a method that will capture better rate of return and as always, encourage folks to comment on areas they feel need improving.

2022 California Police Chiefs Conference in Sacramento February 7-10, 2022

This year, we did not present a training session for Cal Chiefs. Instead, I gave a 5-minute opening remarks speech to the 500 or so Chiefs at the opening meeting. And during the Chiefs' dinner, Beaumont Chief Sean Thuilliez, (our own CAMTC Board Member), gave a great rousing speech at the Cal Chiefs opening ceremonies. Sean is a great speaker and a natural for making friends and developing new connections for CAMTC. He was well received and is a strong asset to CAMTC. In a new twist, I did something new this year. As well as manning our booth with Kellie and Beverly, and talking to Chiefs who visited the booth for a free massage, during our 2-hour lunch session, I took my training flyers to the tables that the Chiefs were eating at and introduced myself and handed out to each Chief our training flyer, introducing them to our free 2-hour POST training and Beverly's free ordinance review that we offer. Many of the Chiefs were very positive and asked several questions about both topics. As a result, several of those Chiefs sent their officers to our March training and we look forward to our future training numbers to get a bump from this contact.

DATE ATTENDED	Email:	Overall, how satisfied were you with the presentation?	Was the information presented useful to you in your daily work activities?	Was there something NOT covered that you wanted to know?	How likely are you to recommen d this training to a colleague?	Do you have any suggestions to help us to improve our presentation?
01/05/22		Very satisfied	Extremely useful	no	10	no
01/05/22		Very satisfied	Extremely useful	All good.	10	Very informative. Just a few follow up questions for clarity.
01/05/22		Very satisfied	Extremely useful	I believe it was mentioned that just because a business is on rubmats.com doesn't mean the business is illicit. I guess the takeaway from this is that it all comes down to the underlying conduct (behavior) of the individual.	10	Rick is fantastic about educating on this topic and in what CAMTC does. Quite an operation! Right down to the in-house machinery and printing.
01/05/22		Very satisfied	Extremely useful		10	It was a good presentation with useful information. Well done. Thank you!
02/02/22	baheam@ar	Very satisfied	Yes, Extremely Useful	NA		No suggestions. Staff were dedicated and humble. And thank you to Rick for his 32 years of service with LAPD and to all staff for your on-going commitment to public safety.
02/02/22	nduzman@r	Very satisfied	Yes, Extremely Useful	Yes, but Rick took the time to answer my questions. Very much appreciate it.	n/a	
02/02/22	angelica.jau	Very satisfied	Yes, Extremely Useful			
02/02/22	brenzi@sunt	Satisfied	Somewhat useful	Not at this time.		Thank you for the information.
03/02/22	costag@co.t	Very satisfied	Yes, Extremely Useful		8	
03/02/22	kempel@bur	Very satisfied	Yes, Extremely Useful	Everything was covered that I wanted to know.	10	Presenter did a good job, I wouldn't change anything.
03/02/22	KarmaLInve	Very satisfied	Somewhat useful		10	
03/02/22	cgreen@city	Satisfied	Somewhat useful		8	N/a
03/02/22	Bill Norman	Very satisfied	Yes, Extremely Useful		10	No, I appreciate the help!
03/02/22	mwilliams@g	Very satisfied	Yes, Extremely Useful	No	9	No

* Required

1. Email: *

2. Overall, how satisfied were you with the presentation?

- ☐ Very satisfied
- ☐ Satisfied
- ☐ Neither satisfied nor dissatisfied
- ☐ Dissatisfied
- ☐ Very dissatisfied



CALIFORNIA MASSAGE THERAPY COUNCIL

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tel 916.669.5336 fax 916.669.5337 www.camtc.org

To: CAMTC Board of Directors
From: Roberta Rolnick, CAMTC Outreach Director
Re: CAMTC Board Meeting - April 12, 2022

Upcoming & Recent Events

January 11, 2022 – San Francisco Collaborative Against Human Trafficking via Zoom
February 8-10, 2022 – CPCA Annual Training Symposium in Sacramento, CA
June 9, 2022 iConnection – Uniting The Spa + Wellness Industry in San Diego, CA
September 12-14, 2022 WLLE Training Symposium in Anaheim, CA
March 12-15, 2023 CPCA Annual Training Symposium in Monterey, CA

CPCA Annual Training Symposium, February 8-10, 2022

This was the first in-person CPCA event since the start of COVID-19, which contributed to fewer attendees. Rick McElroy gave a well-received presentation, and showed his humorous side, which was very well received. Thank you to both CAMTC Board Members, Chief Sean Thuilliez and Dr. Stephany Powell, who joined us at our table for the CPCA President Installation Reception.

Southbay Coalition to End Human Trafficking (SBCEHT)

CAMTC was a platinum sponsor for the January 2022 four week series of the Road to Cultivating Self-Sufficiency in the Anti-Trafficking Movement. The event included a book release of “Taking Down Backpage, Fighting the World’s Largest Sex Trafficker” by former prosecutor Maggy Krell.

San Francisco Collaborative Against Human Trafficking (SFCaHT)

CAMTC Co-Sponsored the 2022 Annual Awareness Campaign of the San Francisco Collaborative Against Human Trafficking. This was the SFCaHT kickoff to the Human Trafficking Prevention Month, which included the 2022 Modern-Day Abolitionist Award winners.



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