



Florida Department of Health

Division of Medical Quality Assurance

**Florida Massage Therapy Schools
Transcript Integrity Report**

September 26, 2012



Rick Scott
Governor

John H. Armstrong, MD, FACS
State Surgeon General

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I. Executive Summary

On September 19, 2012, the Florida Department of Health (DOH) issued 81 emergency suspension orders against licensed massage therapists who were alleged to have obtained their massage therapy school transcripts fraudulently through an unscrupulous employee.

At the request of Governor Rick Scott, the State Surgeon General and Secretary of the Health John H. Armstrong, MD, FACS, FCCP, convened a conference call with Florida-approved massage therapy schools and directed a survey of the schools to identify existing and best practices related to the integrity of the transcript process in three areas:

- Employee background screening and evaluations.
- Transcript creation and accessibility.
- Transcript validation.

The call was conducted on Thursday, September 20, 2012. Although no official roll call was conducted, 98 callers participated. Dr. Armstrong provided a history of the issue that led to the unprecedented conference call with the schools and asked for the schools' cooperation in partnering with the department to halt unscrupulous activity in the provision of transcripts. Subsequent to the conference call, Dr. Armstrong also spoke with the Florida Board of Massage Therapy Chair, Karen Goff Ford, LMT, and reiterated the department's commitment to the integrity of the licensure process.

A web-based survey was developed by the Division of Medical Quality Assurance and e-mailed to 213 massage therapy schools with a response deadline of 5:00 p.m., EDT, Tuesday, September 25, 2012. To maximize the response rate, the staff conducted follow-up telephone calls to the schools, sent subsequent email reminders, and continued with follow-up calls until the deadline. Two results came out of the follow-up calls. First, the list of 213 approved massage therapy schools was reduced to 197: 16 were either no longer in business or no longer offered massage therapy degrees. Second, 116 responses were received on behalf of 135 of the 197 Florida schools, a response rate of 69%.

Some results of the survey follow:

- 58% of respondents indicated they perform background checks on employees; of the 42% who do not perform them, 60% plan to initiate the process.
- 80% of respondents indicated they perform employment history checks; of the 20% who do not, 62% plan to initiate a process.
- 98% of respondents limit employee access to transcripts and materials used to create transcripts; the remaining 2% plan to initiate limitations.
- 87% of the respondents indicated their owner or director audit their transcripts prior to submitting them to the Department or other regulatory agencies; of the 13% who do not perform audits, 60% indicated they plan to develop a process.
- 93% of respondents indicated they have protocols in place to ensure the security of the transcript creation process; 90% indicated they have security protocols in place for the transcript transmittal process. Of the respondents who do not have protocols in place, over 75% indicated they do plan to establish them.

From the survey, a number of best practices were identified by respondents and are included in the survey results. The DOH and Board of Massage Therapy will collaborate with the Department of Education (DOE), Commission for Independent Education to promote best practices for transcript integrity in massage therapy schools. Further, DOH will continue outreach to non-respondents to obtain their responses to the survey and also plans to conduct a follow-up survey in 6 months to determine if security protocols have been enhanced, if schools have encountered any implementation challenges, and if any security breaches were discovered.

II. Methods

A. Conference Call

On Thursday, September 20, 2012, Dr. Armstrong held a telephone conference with Florida approved massage therapy schools and other interested parties to discuss the recent events and to enlist their assistance in minimizing the risk at their respective institutions.

B. Outreach

On Friday, September 21, 2012, Executive Director of the Florida Board of Massage Therapy, Anthony Jusevitch, sent a web-based [survey](#) to all Florida approved massage therapy schools, requesting they complete and submit the survey by 5:00 pm EDT, Tuesday, September 25, 2012. The survey solicited information from the schools about their current processes for the creation and distribution of transcripts, as well as accessibility to and security of school transcripts and materials.

On Friday, September 21, 2012, board staff called all massage therapy schools to ensure they received the e-mail and survey. Staff also informed the schools that were not on the conference call of the discussion and the information shared by Dr. Armstrong.

On Monday, September 24, 2012, Anthony Jusevitch sent a subsequent e-mail to all schools thanking those schools who completed the survey and asking those who had not completed the survey to do so. Board staff continued to call schools that had not completed the survey to obtain maximum participation.

On Wednesday, September 26, 2012, Dr. John H. Armstrong spoke to Ms. Karen Goff Ford, Chair of the Board of Massage Therapy. Dr. Armstrong and Ms. Ford discussed the roles of DOE, DOH and the Board of Massage Therapy in maintaining the integrity of massage therapy. The importance of managing disciplinary cases and strengthening relationships with law enforcement was also discussed. Ms. Ford expressed her appreciation for Dr. Armstrong taking swift and decisive action with emergency suspense orders against those who have engaged in illegal activity to infiltrate the profession of massage therapy.

As of Wednesday, September 26, 2012, 135 massage therapy schools completed the survey. A number of institutions with multiple massage therapy school locations completed the survey for all related campuses in one survey response.

As a result of Board of Massage Therapy staff's outreach, the list of approved massage therapy schools has been updated to reflect a current number of 197 approved massage therapy schools.

III. Survey Results

The results of the survey were compiled and analyzed to evaluate current processes and best practices. As a result of the staff's outreach efforts, 116 responses were received on behalf of 135 of the 197 Florida massage therapy schools, a response rate of 69%. Some schools submitted one response for multiple campuses.

Employee Screening

For those employees who have access to the materials used to create transcripts, who participate in the creation of transcripts or who distribute transcripts:

- A little over half of the respondents (58%) indicated that they currently perform background checks. Of those respondents who indicated that they do not currently perform background checks, 60% indicated that they plan on initiating such a process.
- The majority of the respondents (89%) indicated that they perform employment history checks. Of those respondents who indicated that they do not currently perform employment history checks, 62% indicated that they plan on initiating such a process.

- Almost all of the respondents (94%) indicated that they regularly evaluate the performance of the employees. Of those respondents who indicated that they do not currently evaluate the employees, 86% indicated that they plan on initiating an evaluation process.

Transcript Creation and Accessibility

Almost all of the respondents (98%) indicated they limit employee access to transcripts and the materials required to create transcripts. Those respondents who indicated they do not currently limit access stated they plan to begin limiting access. The majority of respondents (86%) indicated their transcripts are created by mid-managers, administrators, directors or owners. Only a small percentage of respondents indicated non-supervisory or “clerical” staff are involved in the creation of their transcripts (14%), or have access to transcripts or related materials (9%).

A review of the processes submitted by respondents indicates most (56%) limit their transcript creation and accessibility to one or two people. The rest of the respondents either indicated their process involves three or more people (17%) or did not specify how many people were involved (27%).

Transcript Validation

The majority of the respondents (87%) indicated their owner or director performs audits of their transcripts prior to submitting them to the DOH or other regulatory agencies. Of those respondents who indicated their owner or director does not perform an audit, a little over half (60%) indicated they plan to develop an audit process. Almost all of the respondents indicated they have protocols in place to ensure security of the transcript creation process (93%) and the transcript transmittal process (90%). Of those respondents that do not currently have protocols in place, over 75% indicated they plan to develop protocols.

IV. Best Practices

The Florida approved massage therapy schools shared the following best practices:

- Limit the creation of transcripts to higher-level staff.
- Have one secure computer for access to and creation of transcripts.
- Make sure that transcript software is password protected.
- Have multiple checks and balances in place to verify authenticity and accuracy of transcripts.
- Ensure all transcript materials (including the school seal) and student records are in a locked, secure place with limited accessibility.
- Use an electronic system for the creation of transcripts that includes an audit trail.
- Conducting periodic audits of transcripts created and the transcript process.
- Have transcripts audited or signed by the director or owner.
- Enclose official transcripts in a sealed envelope that states, “Transcript is not valid if seal is broken.”
- Print transcripts on a watermarked paper that will reveal “copy” if an attempt to copy is made.

V. Recommendations

The Florida approved massage therapy schools shared the following recommendations:

- Look at the integrity and adequacy of the exams.
- Create a database accessible to schools that list the applications submitted to DOH by students of the school.
- Require vocational programs to show proof to DOH that employees with access to vital records have been screened.
- Require students to be screened by DOH to ensure they are eligible for licensure prior to enrolling in a program.

VI. Conclusions

First, massage therapy schools have been invited to the next Board of Massage Therapy meeting on October 25, 2012, where Dr. Armstrong will share the results of the survey and reiterate his support of the massage therapy industry and its critical role in Florida's economy and for the benefit of citizens and visitors alike.

The results of the survey will be placed on the agenda of the Board of Massage Therapy meeting on October 25, 2012, for consideration for further actions. The Board of Massage Therapy has the authority to approve massage therapy schools curriculum, while the Department of Education, Commission for Independent Education (DOE) licenses massage therapy schools.

DOE participated in Dr. Armstrong's telephone conference call. DOH will continue to strengthen its partnership and collaborate with DOE to develop best practices for massage therapy schools. The lessons learned may also serve as a starting point for other licensed industries and will be shared with statewide and national partners as appropriate.

On Monday, October 1, 2012, Anthony Jusevitch, Executive Director of the Board of Massage Therapy will send a follow-up letter to the 62 approved massage therapy schools that did not respond, requesting they complete the survey.

In March 2013, a follow-up survey will be sent to the approved massage therapy schools. The survey will determine if security protocols have been enhanced, if schools have encountered any implementation challenges, and if any security breaches were discovered.

Finally, DOH will remain vigilant to ensure the integrity of the licensure process. We will continue our work with massage therapy schools to help them identify and improve processes where it is necessary.

APPENDIX

Florida Massage Therapy Schools Transcript Integrity Survey

Florida Massage Therapy Schools Transcript Integrity Survey

School Name:

Your Name:

Employee Background Check

1. Do you perform criminal background checks on employees who have access to the materials used to create transcripts, who participate in the creation of transcripts or who distribute transcripts?

Yes

No

1a. If no, do you plan to initiate such a process?

Yes

No

2. Do you perform employment history checks prior to hiring employees who have access to the materials used to create transcripts, who participate in the creation of transcripts or who distribute transcripts?

Yes

No

2a. If no, do you plan to initiate such a process?

Yes

No

3. Do you regularly evaluate the performance of employees who are involved in the transcript creation process?

Yes

No

3a. If no, do you plan to initiate an evaluation process?

Yes

No

Access to Transcripts and Materials

4. Do you limit employee access to transcripts and the materials required to create transcripts?

Yes

No

4a. If yes, please explain.

4b. If no, do you plan to begin limiting employee access?

Yes

No

5. What level of employee creates the transcripts?

Non-supervisory

Mid-manager/Administrator

Director/Owner

6. What level of employee has access to transcripts and related materials?

Non-supervisory

Mid-manager/Administrator

Director/Owner

Security of Transcripts

7. Does your massage therapy school's owner or director perform audits of your transcripts prior to submitting them to the Department of Health or other regulatory agencies?

Yes

No

7a. If no, do you plan to develop an audit process?

Yes

No

8. Do you have protocols in place to ensure security of the transcript creation process?

Yes

No

8a. If no, do you plan to develop protocols?

Yes

No

9. Do you have protocols in place to ensure security of the transcript submittal process?

Yes

No

9a. If no, do you plan to develop protocols?

Yes

No

10. Briefly describe your protocols for ensuring the security of creating and submitting transcripts to the Department of Health or other regulatory agencies.

11. Please share your BEST practices and/or suggestions for ensuring transcript integrity.