

**STATE OF NEW HAMPSHIRE**  
**MASSAGE THERAPISTS ADVISORY BOARD**  
**Order on Petition for Declaratory Ruling**  
**Petition of Autumn Dion**

Autumn Dion (“Petitioner”) requests a declaratory ruling by the Massage Therapists Advisory Board on whether training hours completed a massage therapy training program completed outside New Hampshire may be combined with additional hours completed at a New Hampshire-approved massage therapy program in order to satisfy the licensure requirement.

Petitioner completed 675 training hours at a North Carolina-based training program. She also completed the MBLEx examination but was never licensed. She subsequently was admitted to the American Academy of Health and Beauty, where she plans to complete an additional 100 hours of coursework and 21 hours of clinical work.

**Procedural and Factual Background**

On March 9, 2026, Petitioner submitted a petition for declaratory ruling pursuant to NH Admin. Rules Plc 210, *et seq.*, asking whether the training hours completed at an out-of-state massage training program can be combined with a New Hampshire-approved massage training program to satisfy the total educational hours required for massage therapist licensure in New Hampshire. Specifically, Petitioner asked, “[w]hether an applicant who completed a 675 [hour] massage program in another state may satisfy New Hampshire 750 hour [sic] education requirement by completing an additional 75 hours at a New Hampshire approved massage therapy school[?]”

**Legal Standard**

Petitioner seeks initial licensure as a massage therapist. NH Admin. Rules Plc 904 sets forth the standards for initial licensure as a massage therapist in New Hampshire. Under Plc 904.01, the candidate for initial licensure must: (a) meet the educational requirement described in NH Admin. Rules Plc 904.02 and (b) pass one of the examinations described in NH Admin. Rules Plc 904.05.

NH Admin. Rules Plc 904.02 states the minimum educational requirement for initial licensure is “completion of a course of study at a qualifying massage therapy school as described in Plc 904.03.” NH Admin. Rules Plc 904.03(a) defines a “qualifying massage therapy school,” as one that holds accreditation from COMTA, ABHES, or ACCET.<sup>1</sup>

A school lacking those accreditations must meet the alternative pathway requirements stated in NH Admin. Rules Plc 904.03(b). That rule requires a non-accredited school “shall require study for at least 725 hours” over not less than 6.5 months and the course of study shall cover specified subject areas. The rule identifies its statutory authority RSA 328-B:4, VII(c), which is the Executive Director’s rulemaking authority to establish “qualifications required for a massage therapist which shall include demonstration of passage of the National Certification Examination for Therapeutic Massage Bodywork or any other nationally recognized certifying examination.”

### **Discussion and Analysis**

The operative question for Petitioner’s purposes is the proper construction of NH Admin Rules Plc 904.03(b), which requires a non-accredited massage therapy program “require study for at least 725 hours.” On its face, the rule does not specify if the 725 must be at a single school or if they can be aggregated from various schools. Indeed, the rule’s history provides little additional context since the enabling statute provides the Executive Director broad discretion.

Rather, the rule regulates the *total* course of study, not the source of each individual hour of instruction. If the Board or legislature had intended to prohibit transfer or prior training credit, the rule or enabling statute would say so explicitly.

Accordingly, the more natural reading is that under NH Admin. Rules Plc 904.03(b), a school must ensure a student’s overall education meets the 725-hour requirement and meets the subject-matter coverage described in NH Admin. Rules Plc 904.03(b). Whether a school chooses to accept prior training toward that requirement is fundamentally an educational and business determination made by the school, provided the program satisfies the rule. The Board does not independently evaluate or approve transfer credit decisions made by educational institutions.

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<sup>1</sup> The Commission on Massage Therapy Accreditation (COMTA); the Accrediting Bureau of Health Education Schools (ABHES); and the Accrediting Council for Continuing Education and Training (ACCET).

Under that interpretation, a candidate must still meet all other applicable licensing provisions beyond the educational requirement, including:

- Topic coverage requirements in NH Admin. Rules Plc 904.03(b);
- Distance education standards in NH Admin. Rules Plc 904.03(c);
- Documented practical hours in NH Admin. Rules Plc 904.04;
- Passing an examination in NH Admin. Rules Plc 904.05; and
- Submission of application materials in NH Admin. Rules Plc 904.06-904.07

### **Conclusion**

Petitioner asked, “[w]hether an applicant who completed a 675 [hour] massage program in another state may satisfy New Hampshire 750 hour [sic] education requirement by completing an additional 75 hours at a New Hampshire approved massage therapy school[?]”

A massage therapy licensure candidate who attends a program under NH Admin. Rules Plc 904.03(b) may aggregate hours across massage therapy education providers in order to meet the 725-hour requirement stated in Rule Plc 904.03(b), provided the aggregated 725 hours satisfy the topic coverage requirements stated in that rule. Licensure candidates must meet all other requirements for initial licensure.

This interpretation would not guarantee Petitioner’s licensure. The Petitioner’s application must still be evaluated on its own merits.

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