Regulation Matters:
a CLEAR conversation

Episode 107: Transforming Regulatory Practice – Spotlight on CLEAR's 2026 Award Recipients

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Line Dempsey: Welcome back to Regulation Matters: a CLEAR conversation. I'm your host, Line Dempsey. I'm the chief compliance officer with Riccobene Associates Family Dentistry with practices in North Carolina, South Carolina, and Virginia. I've also served as a CLEAR board member and past president.

The Council on Licensure, Enforcement and Regulation is a global community of individuals, agencies, and organizations involved in professional and occupational regulation. This podcast is where we bring that community into the conversation, exploring important regulatory issues, sharing perspectives and experiences, and talking with the people working to promote regulatory excellence.

Each year, CLEAR presents awards in several CLEAR award categories, and we always like to feature those award winners on the podcast. The 2026 awards were presented in Portland during the Annual Educational Conference. I had the opportunity to chat with some of our award recipients in person and catch up with others virtually. I'm excited to share those conversations with you.

Line: I'm glad to get a chance to speak with CLEAR's 2026 Regulatory Excellence Award recipients. This award honors teams or individuals that demonstrate leadership, vision, and creativity in strengthening regulation and protecting the public. I'm excited to speak with one of our award recipients today, Dr. Yousra Alatiq. She is the CEO of Professional Practice for the Saudi Commission for Health Specialties. Yousra, welcome and congratulations on this award.

Yousra Alatiq: Thank you, and thank you for having me.

Line: Absolutely. This award nomination describes this initiative as transforming qualification review from an operational process into a regulated governance function. What prompted you to rethink qualification review in that way? And what did you see as the limitations of the previous approach?

Yousra: Yes, sure. What prompted us to rethink qualification review in this way was the broad regulatory responsibility of the Saudi Commission. And maybe allow me to give you a brief about our role. The Saudi Commission for Health Specialties regulates multiple aspect of healthcare profession in the kingdom. These aspects include registration, examination, post-graduate training, as well as accreditation, including CPD. This responsibility is not only for one, but all healthcare professions. In total, we regulate forty-one health professional titles.

And because of that broad responsibility, we realized that qualification review should not be viewed simply as an operation process for individual application or case-by-case assessment. We saw that this approach alone was not sufficient to provide a consistent framework or transparent decision-making.

So we believe qualification review is an important regulatory function that directly affects who is recognized to enter and practice within the healthcare system, and therefore has implications for public protection, especially given the diversity of international qualifications that we deal with and the large number of professional titles that we regulate.

Line: Excellent. I know a central part of the reform was connecting qualification decisions to risk levels, scopes of practice, and professional equivalency. How did that framework change the way decisions were made about qualifications?

Yousra: Yes. Instead of asking simply, is that qualification acceptable, we move to a more structurally informed judgment. What does this qualification prepare the individual to do? What competency does it demonstrate, and what scope of practice does it support? This meant that qualification recognition was no longer treated as a standalone academic equivalency exercise. We connected that qualification review to the professional scope of practice, core competency, and educational pathway required for that title.

We also introduced a risk-informed perspective. Rather than applying the same level of standards to every specialty, the requirements for recognition could be considered in relation to the potential risk of harm associated with that professional practice. This is consistent with our broader work in right touch regulation reform, in which we revised our general registration standards according to the expected risk of harm to the public.

Line: Great. As I understand it, the initiative involved developing more than 100 specialty and specialization descriptions, therefore creating a centralized qualification database and reviewing, I

think it was, like, nearly 50,000 qualifications. Yeah. What are some of the biggest challenges in bringing all that information into what I would consider a consistent and structured system?

Yousra: Yeah, one of the biggest challenges, of course, was the diversity and complexity of the qualifications we were dealing with. We were not simply trying to organize list of certificate. We were trying to create a consistent understanding of qualifications coming from different countries, education system, and professional context.

The second challenge was establishing the common reference point, which is the specialty description card, for making decision. As I mentioned, much, much of our work was dealt with through individual cases, individual reviewer, using their own professional judgment. Moving to a more structured system meant that standardizing terminology and equivalency information and linking that to common reference point, which is the specialty description card, and clearly define the professional scope of practice, core competency, and educational pathway leading to that professional title.

Line: Yeah, I think I, I said just a moment ago nearly 50,000. You ultimately reviewed, and I'm looking at the number here right now, 49,497 qualifications, and you reduced the decision timelines from this from several months to 25-50 working days, which is very impressive. What changes made the biggest difference, in both efficiency and consistency of those decisions?

Yousra: The biggest change was to standardize the way we define each professional title. By developing the specialty card, we establish a common reference for each title. This meant that reviewers were no longer starting from the qualification itself. They were assessing the qualification against clearly defined professional reference. That's the biggest change.

And the second one was systematically organized and cleansed up the qualification information that we're currently having in our database. This was especially important because we were dealing with a very large of diverse number of qualifications. Having a standardized equivalency information in a centralized structure reduced duplication, variation in interpretation, and the need for repeatedly reconsidering similar qualification.

Line: As I understand it too, the initiative also involved engagement with more than 40,000 practitioners, as well as professional councils and health institutions. Why was stakeholder input so important to the reform, and were there any ways that feedback changed or maybe even improved your approach?

Yousra: We believe stakeholders' input is essential because the reform was not simply an administrative exercise. It directly affects how the qualification is interpreted, recognized, and linked to professional practice. We needed to make sure that the new framework reflected the reality of practice while remaining consistent, transparent, and focused on patient safety. So engaging

practitioners, professional council, and health institutions give us a wider perspective. The feedback also helped us refine standard and identify area where our initial assumption needed to be reconsidered.

Ultimately, this engagement strengthened the reform in two way. It improved the technical quality of the decision, and it increased the trust and ownership among the professionals affected by that change.

Line: One of the goals was to improve the practitioner experience while strengthening public protection. How do you see those two objectives working together in qualification regulation rather than being competitive priorities, if you would?

Yousra: This is a great question. I see these two objectives as mutually reinforcing rather than competing priorities. In regulation, protecting the public is the primary responsibility, but the protection can be achieved more effectively when the process is also clear, predictable, and efficient for practitioners. A lengthy or inconsistent system could create uncertainty for practitioners without necessarily providing greater protection to the public. So our approach was to strengthen the quality of the decision while reducing unnecessary complexity and delay to make decisions more transparent and predictable.

Line: For regulators in other jurisdictions that maybe they're dealing with a complex qualification system or maybe even large numbers of practitioners or inconsistent qualification decisions- what lessons from this experience would you encourage them to consider?

Yousra: I would highlight four lessons from our experience. First, treating qualification review as a governance system, not simply as an administrative process. When we are dealing with tens of thousands of qualifications, relying on individual interpretation is difficult to sustain. We need a clear framework, standardized criteria, and reliable, source of reference.

Second, invest in the structure and framework before trying to improve process. We found that developing clear specialty description card and restructuring the qualification database created a foundation for more consistent decision. Once the structure was clear, efficiency can follow.

Third, identify what regulation is actually needed. As a risk-based approach, allow regulator to focus where the genuine question about competency or patient safety, rather than applying the same level of regulation burden to everything.

And finally, measure the reform by both regulatory outcome and practitioner experience. It is not enough to say that decision are faster. We should also ask whether decision are more consistent, transparent, defensible, and focused on public protection. The broader lesson, that complexity should

be managed through better regulatory design rather than simply adding more people or layer to the system.

Line: Those are great principles to follow, so thank you for sharing that. And Yousra, thank you for sharing your story with us today. Your work reflects a clear ability to transform complex regulatory challenges into structured system-wide improvements that enhance both public protection, but also the practitioner experience. So congratulations again on receiving the CLEAR Regulatory Excellence Award. Well deserved.

Yousra: Thank you for having me, and thank you for CLEAR for this recognition.

Line: Absolutely. Thank you.

We'll be back to my conversation with the CLEAR Award winners in just a moment. But first, CLEAR would like to thank our podcast episode sponsor. Today's episode is sponsored by Meazure Learning, CLEAR's 2026/27 Friend-level Premier Partner. Surface security threats and back every assessment decision with evidence. Defensibility you can see from Meazure Learning. Learn more at meazurelearning.com. That's measure with a Z. Thanks to Meazure Learning for their support. And now back to my conversation with our award winners.

Line: I'm glad to get the chance to speak with CLEAR's 2026 Consumer Protection Award winner. This award honors individuals or teams who go beyond enforcement to enhance public understanding of regulation and strengthen consumer protection. Our award recipient is Utah's Division of Professional Licensing and the Office of Professional Licensure Review. The team spearheaded the creation of the Utah Massage Establishment Registry, creating a powerful deterrent against human trafficking. Lisa and Jeff, congratulations on the award. We're delighted to have you with us today to share more about your team's work and its impact, so welcome.

Lisa Martin and Jeff Shumway: Thank you. Thank you. Good to be with you.

Line: So Jeff, let's start with what prompted this work. What did the Division of Professional Licensing and the Office of Professional License Review learn from the 2024 review that made it clear that the existing approach to illicit massage businesses was not working, and that a different regulatory strategy was actually needed?

Jeff: Yeah, so my office, by statute, we have to review every regulated occupation once every 10 years. And so when we approached massage therapist, we knew a bit about the... There had been recent changes in Utah that created a first in the nation assistant level, a lower level license. And so we were thinking about that as we came into it. But then the deeper we got into it, it became clear that there was this concern amongst the legitimate massage therapists that their reputation, their industry was being kind of sullied by this, what we were calling illicit massage businesses, which are basically just a nice way of saying brothels, right?

And there was this overlay of human trafficking and sex trafficking. And so we started getting into this funky area that we didn't usually find ourselves in, talking with Homeland Security, and there's a strike force here in the AG's office, and a lot more criminal justice that had been struggling with how to deal with these establishments.

And so once we got into that, we had to piece apart the way we regulate typical, legitimate massage from then these illicit massage businesses where you had coercion and deception running in lots of different directions. So the workers there, who are normally the ones being enforced against for unlicensed practice, most of them, we understood, had been coerced into this line of work in the first place. They had been told they were coming for a totally different type of job, and then there's a bait and switch once they get here. And so it became more and more clear to us that enforcing in the way we had been around unlicensed practice of those individuals was actually exacerbating the problem of human trafficking, sex trafficking, rather than addressing those that were benefiting from it, the owners, whether they were real owners or paper owners.

And so that's what sort of got our wheels spinning to say there has to be a better way to address this.

Line: Thank you for that. Lisa, I know the nomination highlights that one of the most significant changes was shifting the focus of enforcement away from the individual workers and toward the owners and the people profiting from these businesses, what Jeff just led to. Why was this shift so important and how did it change the way your agency approached enforcement?

Lisa: Yeah, so like we just talked about, oftentimes in these businesses, the licensed individual massage therapist is oftentimes a victim. And up until this change, the division only had regulatory authority over the individual. And so the shift to the architects of the issue and the owners of the businesses was vital for administrative authority to really address where the problem's foundation is. And so one of the bigger ways that we're able to address that is that now owners with this registry are required to do a complete criminal background check upon receiving the registration. And so we can see if those owners have a history that is concerning for the massage industry.

Line: That's great. I know also that the massage establishment registry replaced what, in the nomination is described as, a patchwork, if you would, of local rules. What did creating a statewide system allow you to do that was difficult or maybe even impossible under the previous approach?

And Lisa, why don't you jump on that one? And then, Jeff, if you got anything else to add on that, I would love to hear your thoughts too.

Lisa: Yeah. Up until the divisions required a registry with DOPL, all the establishment regulations were city to city, county to county. They had a vast variety of what that could look like. And if an owner got in trouble in location one, they could simply move their whole operation to a second location in another city or county. So to have a single statewide location of information and history, we'll be able to reduce that quick mobile shift of location if there's troubling activity.

Jeff: Yeah, and I guess what I would add is when we were talking to stakeholders, so again, we talked with a lot of folks on the criminal justice side, but also the local business registry folks, and they were all asking us, could we help, right? They said, "There's a problem here. We don't know... We can't enforce it. It's much easier for us to send them to you all for unlicensed practice rather than trying to actually prosecute a human trafficking case at the federal..." That's what the federal folks were telling us. But then we were also hearing that there were some jurisdictions that were heavily involved, the police were heavily involved trying to stamp this out, and they had real ordinances and real teeth around it, and others that did not. And because of that patchwork, as Lisa was saying, you could shut someone down and it would literally reopen three blocks over in a different strip mall within days.

And as we, got further and further into this, we heard really interesting stories about how the women in these illicit massage businesses will often be rotated, so every four to six weeks, and when they're moved around, they're often carrying a carry-on rolling piece of luggage just full of cash, and that cash is so that they can start up. If they get shut down in one area, they can start up again very quickly in another area. So the folks that are doing this are sophisticated, they're well-resourced, they understand the way enforcement has been done in the past. So anything that was not statewide was gonna allow them to continue to move, and to shift as enforcement shifted.

And so we felt strongly that unless it was a statewide approach, we would just be sanctioning the ongoing, illicit massage businesses. So the statewide thing was, I think, really important to us and to DOPL.

Line: Yeah, that makes complete sense, and a lot easier to deal with this on a statewide level by doing that. It's sort of like, you know, having ants in the yard out there, and if I treat just the one little section, they just up and move. They go to another area, right? And being able to have this throughout the whole state is very helpful. So getting this initiative into law required DOPL and OPLR to champion this House Bill 278 and work with the policymakers and other partners. What did that process look like? And what were some of the challenges involved in building support for the changes? It sounds to me like getting everybody on board because of the statewide registry would be helpful, but, how did that look?

Jeff: So we're really lucky in that we have a strong relationship with the Business and Labor Committee. Our statute tells us specifically that we report into the Business and Labor Committee. And so we have strong relationships with the chairs. We're presenting in front of that committee over interim, between sessions quite a bit. And so we had been previewing that there was a real issue in massage therapy that we wanted to try to address, that we would be bringing recommendations, so they were not surprised by this.

When it came to the legislation itself and the sponsor, again, we were working with someone that we know who's on that Business and Labor Committee. The only issue was the bill contained our recommendations, which were really around trying to stamp out and restrict this illicit massage business, but then the sponsor also had another set of recommendations that were aimed at a different purpose.

And so one of the challenges there is just making sure that everyone was able to distinguish those two things. And so we would come up to the podium and speak about our set of recommendations, but then people would read these other things in the bill as well. And so I think having lots of stakeholder conversations throughout, having presented a couple different times over interim to that committee really helped so that the chairs and others understood, "Oh, this is what the committee thinks this bill is doing. Here's what we're seeing. Does it still match kind of what the committee voted on?" Because it was voted out of committee with a favorable recommendation, which was really helpful as well.

Lisa: And I'll add to that that once the bill was published and available, the Utah Massage Therapy and Acupuncture Licensing Board requested as part of one of their agendas to have the bill sponsor attend and discuss the bill, not only just how it was drafted, but they made sure to discuss some key points that were important to individuals in the industry.

There was a lot of good discussion about recognizing that there are good, upstanding business owners in the massage industry, and that there was a balanced approach to not too much burden regulations, but that we were addressing the issues. We also had a discussion about maintaining the good policies that already existed for licensing the individuals and making sure that the bill, when it finalized, didn't disrupt what already existed for individual license holders.

We also had some really good vocal individuals that all happen to be licensed massage therapists in the state of Utah that were really engaged, not only at that board meeting, but they also took the time to contact the bill sponsor, and he listened to them as well in making sure that there was good input from multiple different sources.

Line: Thank you. So your consumer protection efforts go beyond just enforcement. How do you think about your role of public education, primarily the campaign with local law enforcement and the new point of service disclosure requirements? Can you tell us more about that? And, Lisa, is that a good one for you there?

Lisa: Certainly. So shortly after the bill passed, DOPL, in combination with the Salt Lake Police Department, hosted a press conference, just really reviewing that the bill passed. And, it was an unambiguous warning to illicit networks that Utah regulations have changed, and we are identifying legitimate businesses, and aware of the problem.

Some months after that, after the rules were built in and the application was becoming available, DOPL hosted an educational hour where we invited the Utah Business Licensing Association, police departments, to really just review what the regulations now are, what some of the main application requirements are, DOPL's regulatory administrative discipline options, and then also how all of these different groups can work together for a multilayered approach and, with good communication, can really be looking at these illicit locations throughout the state, and how we can communicate with each other to accomplish the goals that the bill really set out to accomplish.

The last thing that I'd say that we really did for public education, as we all know, a lot of people don't watch legislative sessions the way that us regulators do, so we composed a really informational letter that we emailed out to every Utah licensed massage therapist informing them of the new regulation that had passed, where to find the application.

We'd composed a short slide deck that really put it in layman's terms, out of the legalese language about who should be registering, what those requirements are. And then we also gave links to resources such as that application. There's a required client's rights and safety form that every location needs to have posted in their lobby and in their restrooms that we created, gave them the link to that so they didn't need to create one. We provided that so they didn't fall short of that requirement. But we emailed that out to every license holder so that they were not taken by surprise too harshly.

Line: Excellent. So if I was a consumer just walking into a registered massage establishment today, what differences do these changes make for the consumer side of things? What do you hope consumers are understanding or do differently as a result of this new registry and the disclosures?

Lisa: So what you'd see differently visually is there's a now a lot of required signage for locations. Not only do they need to display their establishment registration from DOPL; they should also have displayed their business license from their city or county, their business registration with the Department of Corporations, as well as every license from massage therapists that they employ.

So visually, that's the first thing that would be noticeable. I'd say some other things is if a person goes to a couple of different locations for massages 'cause they're trying to find a therapist they like, they should better be able to just notice because the feel of the location, if it seems to be an upstanding location that's following all regulations or one that's a little off, that has an ATM in the lobby, or they ask for tips up front and those sorts of things.

We're hoping by making this requirement for everybody that it creates a foundation and a starting point that should just be seen in every massage business that exists.

Line: Jeff, so looking beyond just Utah, what do you think other regulatory agencies should take away from this experience? Are there particular elements of this massage establishment registry or your approach that you believe could be adapted to other jurisdictions? And I, thought it was interesting too that Lisa had mentioned like, the acupuncturists and stuff like that. So it sounds like there's at least some other interest from other regulatory agencies within the state, but even looking beyond that.

Jeff: Yeah, I, think, it's definitely applicable. It could be adapted to other jurisdictions. In fact, that's what we did, right? We had conversations with a national group that's working on human trafficking. They were able to identify exactly which establishments in our state were likely illicit massage businesses. They have an algorithm that they use that scrapes the web, and it goes to sex buying websites and a bunch of other things. And so they were actually really helpful for us to understand the depth of the problem in the state. And then they were the ones who put us onto this model that came out of Aurora, Colorado, which was done at the local level, but was very successful. And we then adapted it to say, "We think we can do this statewide," right?

So if you can do it at the Aurora, Colorado level, if you can do it at the Utah state level, I don't see anything that prevents other states, other municipalities from following something similar. And to me the real question is, like, where are there jurisdictions where there's political will to really ask this hard question like, "Is this something we wanna be? Is this how we want this to go down in our societies," right? Because I think most people have not thought too deeply about what's happening in those massage businesses, right? But once you peel it back, there's a certain amount of sexual misconduct in any sort of touching industry, which I think we as regulators understand.

This goes well beyond that to essentially the weaponization of individual licensure against someone who is a victim of a crime, right? And that's something where we as a society just need to be better. I don't know if this is the final kind of you know, way to address that, but I think it's a great step, and I do hope that other jurisdictions look at it.

Line: Excellent. Lisa and Jeff, congratulations again to the team on receiving CLEAR's Consumer Protection Award. Your team's work on the Massage Establishment Registry is a great example of identifying regulatory gaps and then implementing a reform to address an urgent public safety threat. So thank you again for sharing your story with us, and congratulations again.

Lisa and Jeff: Thank you. Thank you.

Line: It was a lot of fun to talk with our award recipients. We hope that these conversations have given you some ideas, techniques, and skills that you can focus on in your regulatory role as we all together pursue regulatory excellence. I wanna thank our listeners for tuning in for this episode, and we have more award winners to feature. We'll be back with part 2 of our conversations with the 2026 award recipients in March, along with information on the 2027 awards and how you can make a nomination. Be sure to tune in then.

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Finally, I'd like to thank our CLEAR staff for making it a great conference experience and awards presentation in Portland. Once again, I'm Line Dempsey, and I'm happy to be speaking to you again very soon.

The audio version of this podcast episode is available at https://podcast.clearhq.org/e/clear_awards_2026_part1/.