



**american massage therapy association®**  
**nevada chapter**  
empowering Nevada massage therapists  
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Karen Duddleston, Business License Division Manager  
City of Las Vegas  
333 N Rancho Drive  
Las Vegas NV 89106  
June 28, 2012

Re: TXT-44754 Proposed Privileged Licensing – Metro Suitability Amendment 6.52.020, of the Municipal Code of the City of Las Vegas, Nevada.

Dear Ms. Duddleston,

On behalf of the American Massage Therapy Association Nevada Chapter (AMTA-NV) I am writing to thank you for your continued efforts to improve the massage therapy regulations in the City of Las Vegas and to ask for your consideration in altering TXT-44754 Proposed Privilege Licensing-Metro Suitability Amendment 6.52.020 of the Municipal code. AMTA is a professional membership association representing more than 56,000 massage therapists nationally, including approximately 500 massage therapists in Nevada; many of whom reside in the City of Las Vegas, holding independent massage therapy business licenses.

While we commend your work to improve the regulations for massage therapy, we have found an area of concern regarding the added definitions of “medical massage therapy” and “ancillary medical massage therapy” in your proposal. It is the position of the AMTA-NV that by defining “medical massage therapy” and “ancillary medical massage therapy” as new classes of massage therapy, the City may be in conflict with existing state law NRS640.C, which clearly defines massage therapy and establishes a scope of practice for the profession. The City’s current proposal not only seems to usurp statutory authority of the State but also creates an apparent loop hole for non-state-licensed and non-qualified individuals to perform massage in Las Vegas, which we see as a major safety concern.

Massage therapy can have a significant impact on an individual’s health and well-being. Requiring proper state licensure of massage therapists is essential to protect the health, safety, and welfare of the general public from those who do not possess the necessary education and/or experience. An individual without appropriate massage therapy education presents a potential danger to clientele, especially to those having medical conditions where massage is contraindicated.

AMTA-NV recognizes that this proposed legislation may be intended to allow physicians to practice massage therapy and offer massage therapy within their office without the full requirements of a privilege business license; however, we encourage you to find a way to allow physicians to be exempt from massage establishment license without challenging state law.

Thank you for your time and consideration. If I can provide any additional information, please feel free to contact me.

Respectfully,

David Otto, Chapter President, AMTA-Nevada Chapter  
AMTA-Nevada Government Relations Committee

CC: Carolyn Goodman, Mayor, City of Las Vegas, Nevada  
Lisa Cooper, Executive Director, Nevada State Board of Massage Therapists