



UTAH DEPARTMENT
OF COMMERCE

Office of Professional Licensure Review

2024 Periodic Review

Massage Therapy

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Executive Summary

Purpose of Review

Under Utah Code 13-1b the Office of Professional Licensure Review (OPLR) reviewed Utah's licensing laws for massage therapists. The review evaluated how well current regulation:

1. Protects the public from physical and financial harm
2. Ensures fair access to the occupation by consumers and practitioners
3. Limits the economic impact of regulation on consumers and practitioners¹

OPLR's research to conduct this review included: surveying all current licensees, analyzing DOPL licensee and complaint data, reviewing relevant academic literature, interviewing prominent stakeholders, scanning state regulation of massage therapy, and conducting other secondary data analyses.

Background

The practice of massage therapy includes the application of manual or mechanical techniques, such as pressure, friction, kneading, vibration, gliding, and tapotement, to manipulate and physically affect the soft tissues of the body. Massage occurs most frequently at spas and massage establishments, although homes and private offices are common environments as well.

Massage therapy is well-integrated into medical care and represents a promising adjunct to traditional healthcare, especially as a non-pharmaceutical complement in approaching chronic and acute pain management.

To perform massage therapy in Utah, an individual must 1) complete either a 600-hour program in an approved massage school or 1,000 hours as a licensed apprentice, and 2) pass the national MBLEx exam. Passed in 2023, SB 42 opened another route into the industry through the creation of the massage assistant, a lower-tiered license with a scope of practice restricted to basic massage. This license requires 1) completing either 300 hours in an approved program or 300 hours as a licensed assistant-in-training and 2) passing a Utah-specific massage assistant exam.

Utah's massage therapist license largely mirrors that of most states in the U.S., although the apprenticeship and assistant licenses are unique. Few other states allow apprenticeships, and no other state currently has a lower-tiered license similar to the assistant.

Key Findings

Consumer Safety: The practice of massage therapy has the potential to cause multiple forms of harm. The therapist-client relationship in massage is uniquely and inherently vulnerable. Massage often occurs one-on-one in a closed room, requires manual touching of an unclothed

¹ UCA 13-1b

client, and may include work on particularly vulnerable client groups or acute and subacute injuries. Common harms tend to fall within three categories: sexual harm to a client by a therapist, harm from illicit activity such as human trafficking or commercial sex occurring under the guise of massage, or physical harm to a client due to therapist negligence.

- While the vast majority of massage therapists do not cause sexual harm to clients, **massage has the highest volume of sexual misconduct complaints** among DOPL-regulated professions.
- Between **one-third to one-half of the malpractice claims** nationally across a ten-year span resulted from **sexual misconduct**.
- In Utah, the problem of **illicit massage businesses (IMBs) is widespread and growing**, eroding trust in the legitimate and beneficial practice of massage.
- The Network, a non-profit organization fighting human trafficking, has identified roughly **150 active IMBs in Utah (concentrated in Salt Lake County)**, and estimates a 10% growth rate over the last five years.
- The **risk of physical harm from trained massage therapists is quite low overall**, especially for healthy individuals; however, massage modalities are contraindicated for certain health disorders and injuries treated through massage, requiring added care by a practitioner.
- The **most common insurance claims involve**: strains/tears to muscles or ligaments, burns generally from administering hot stone treatment, fractures of bones, dislocations of bones or joints, and sexual misconduct.
- As massage becomes more common as a treatment for pain, cancer and other health issues, **the line between ‘lifestyle’ massage and ‘medical’ massage becomes less distinct**.

Access: Utah has a robust supply of massage therapists and stands as one of the most accessible states for new entrants into massage, making access a secondary concern.

- With 7,941 licensed massage therapists and 214 licensed apprentices, Utah is estimated by one national association to have the **second highest number of massage therapists per capita** in the U.S.
- Although the hour requirement is fairly low at 600 hours, **licensed massage therapists (LMTs) spend, on average, \$12k** to attend massage training programs. Many students depend on federal aid to help pay for school, with just under 40% receiving Pell grants and 50% taking out a federal loan.
- Prior to the new federal ‘gainful employment’ rules for financial aid, **many massage schools in Utah offered programs around 800 hours (above the state hours requirements)** with strong student demand.
- Utah stands as **one of the most accessible states for those looking to enter the massage industry** due to the multiple alternative pathways to licensure that do not exist elsewhere (apprenticeships, new 300-hour massage assistant license).

OPLR found the primary issues in the massage industry to be related to safety rather than access. Sexual misconduct by massage therapists and the proliferation of illicit massage businesses both cause severe harm and sow doubt into the legitimacy of the massage industry

as a whole causing financial harm to legitimate practitioners. Although these problems cannot be entirely addressed by occupational regulation nor fully ascribed to failures in occupational regulation, OPLR posits that there are gaps in regulation that may compound these issues.

While DOPL has authority for criminal background checks for the initial application for licensure, **current regulation does not prevent someone convicted of sexual assault after initially receiving a license** from keeping an active massage therapist license in Utah; **nor does it prevent someone with a license revoked for sexual misconduct in another state** from becoming licensed in Utah.

Additionally, OPLR found that **massage establishments and their owners in Utah lack accountability** due to a fragmented local regulatory structure and varied enforcement for massage establishments. Even assuming a local jurisdiction is very aggressive in investigating and enforcing local codes, IMBs are able to re-open in a nearby city relatively quickly, lessening the impact of local regulation. IMBs continue to receive licenses and permits that legitimize their physical establishments and conceal their illegal activities, indicating that systemic issues exist in this decentralized regulatory environment.

Recommendations

Given concerns about sexual misconduct and IMBs operating in Utah, OPLR recommends:

- Creation of a massage establishment registry to curtail IMBs across the state, and
- Addressing gaps in background checks, oversight, transparency, and education for massage therapists.

First, OPLR recommends that **all massage establishments obtain registration** through DOPL to legally operate within the state of Utah. Such registration should require basic documentation for the business and owners, FBI background checks, and (importantly) a signed attestation stating that the business will not engage in illegal activities, including human trafficking, sex advertising, prostitution, and unlicensed practice. The registration process would allow DOPL to screen for known IMBs and deny registration. The penalty for a registrant engaging in unlawful conduct or violating the attestation should be severe, with fines up to \$10,000 per single violation and \$2,000 per day at the discretion of an administrative law judge. Such a registry would provide overwhelming financial disincentives for IMBs to operate in Utah.

Such a registry does impose a burden on massage businesses, but it is selective: relatively light for legitimate businesses, and very heavy for IMBs. One study estimated that fewer than one-third of business records for massage businesses nationally named an actual person on the registration, and fewer than one-fourth named an owner. The proposed registry would require owners to identify themselves and be accountable for any illegal activities of their businesses.

Second, OPLR recommends **a package of increased accountability and transparency** that would include several elements. Licensees should be checked against the Massage Therapy Licensing Database (MTLD) for interstate licensing information and enrolled in the FBI Rap Back system for ongoing criminal database checks. Next, licensees (and especially massage

assistant and apprentice licensees) should be required to disclose information to clients on DOPL resources, ethics, and their license number to deter sexual misconduct. Lastly, there are several confirming changes that OPLR recommends: standardizing massage instructors' and apprentice supervisors' requirements, enabling massage assistants to count hours towards a full therapist license, and reducing the number of allowable apprentices per supervisor from six to three.

We believe both sets of recommendations are minimally burdensome for legitimate massage therapists, but significantly impair the ability of sexual predators and IMBs and to harm Utah consumers and legitimate massage providers.

Context

Consistent with its legislative mandate, the Office of Professional Licensure Review (OPLR) reviewed Utah’s licensing laws for building inspectors. The review evaluated how well current regulations:

1. Protects the public from physical and financial harm
2. Ensures fair access to the occupation
3. Limits the economic impact of regulation on consumers and practitioners²

OPLR’s research to conduct this review included: surveying all current licensees, analyzing DOPL licensee and complaint data, reviewing relevant academic literature, interviewing prominent stakeholders, scanning state regulation of massage therapy, and conducting other secondary data analyses. See [the Appendix](#) for more information.

Background

Massage Therapy Overview

Massage therapy plays a prominent role in the health and wellness industry in the United States with over 350,000 massage therapists across the nation and millions of Americans seeking massage each year.³ In Utah alone there are 7,941 licensed massage therapists and 214 licensed apprentices.⁴ The practice of massage therapy includes the application of manual or mechanical techniques, such as pressure, friction, kneading, vibration, gliding, and tapotement, to manipulate and physically affect the soft tissues of the body. It is most commonly utilized for general health and wellness reasons,⁵ to “promote the therapeutic health and well-being of a client, enhancing the circulation of blood and lymph, relaxing and lengthening muscles, relieving pain, [or] restoring metabolic balance”.⁶ Massage occurs most frequently at spas and massage establishments, although homes and private offices are common environments as well.^{7,8}

Medical Massage

Massage therapy is well-integrated into medical care and represents a promising adjunct to traditional healthcare, especially as a non-pharmaceutical complement to chronic and acute pain management.⁹ Preliminary studies also indicate that massage may improve immune response, fatigue, and symptoms of depression and anxiety.¹⁰ Therefore, massage therapy may

² [UCA 13-1b](#)

³ AMTA (2024), *Massage Profession Report*. Around 25% of Americans indicated they received a massage between 2022-2023

⁴ DOPL Active Licensee Count, accessed 12/12/2024

⁵ Ibid.

⁶ [UCA 58-47b](#)

⁷ AMTA (2024), *Massage Profession Report*

⁸ OPLR *Massage Survey* (May 2024). See Appendix [2.1 Where Massage Occurs](#)

⁹ For more information and research on the health benefits of massage and its use for various illnesses and disorders, see: [AMTA \(2018\). *Massage Therapy in Integrative Care and Pain Management*](#)

¹⁰ [Rapaport, M.H., et. al \(2018\) *Massage Therapy for Psychiatric Disorders*](#)

be included in patient treatment plans for pain management, physical therapy and rehabilitation, behavioral health, chronic disease, acute injury, maternity, and oncological care.¹¹ Medical massage is gaining recognition in Utah, illustrated by the University of Utah's involvement in research around the benefits of massage, the Huntsman Cancer Institute's investment in massage therapy, and the many licensed massage therapists treating vulnerable client groups.^{12,13,14}

Massage Therapy in Utah

To perform massage therapy in Utah, an individual must seek licensure through the Division of Professional Licensing (DOPL) within the Utah Department of Commerce. One must 1) complete either a 600-hour program in an approved massage school or 1,000 hours as a licensed apprentice, and 2) pass the MBLEx, an exam created and administered by the Federation of State Massage Therapy Boards (FSMTB). Passed in 2023, S.B. 42 opened another route into the industry through the creation of the massage assistant, a lower-tiered license with a scope of practice restricted to basic massage.^{15,16} This license requires 1) completing either 300 hours in an approved program or 300 hours as a licensed assistant-in-training and 2) passing a Utah-specific massage assistant exam.¹⁷

Approaches in Other Jurisdictions

Utah's massage therapist license largely mirrors that of most states in the U.S., whereas the apprenticeship and assistant licenses are unique. Few other states allow apprenticeships, and no other state currently has a lower-tiered license similar to the assistant.¹⁸

Findings: Access

Barriers to entry for the massage therapy industry are mainly the cost of education. Although the hour requirement is fairly low at 600 hours, licensed massage therapists (LMTs) spend, on average, \$12k to attend massage training programs.^{19,20} Many students depend on federal aid to help pay for school; around 40% of surveyed LMTs received Pell grants and 50% took out a

¹¹ Ibid.

¹² OPLR interview series

¹³ [Huntsman Cancer Institute Wellness and Integrative Health Center](#)

¹⁴ OPLR Massage Survey (May 2024). See Appendix [2.2 Medical Massage](#)

¹⁵ [S.B. 42. Massage Therapy Practice Act Amendments](#)

¹⁶ Massage assistants may not work on acute or subacute injuries, engage in any stretching, traction, rehabilitative procedures, or range of motion exercises. They may not assess or counsel with or provide a treatment plan for clients. See Appendix [2.3 Massage Therapy License Structure](#)

¹⁷ [UCA 58-47b](#)

¹⁸ Massage Therapy Policy Scan, for more detail see Appendix [2.4 Massage Therapy Policy Scan](#). Maryland and Delaware used to have lower-tiered massage therapist licenses. Maryland's lower-tier license was substantially different from Utah's massage assistant, and they got rid of their lower tier license due to scope issues. Delaware's massage technician license was more similar to Utah's massage assistant, but their massage board and regulatory agencies would not respond to any requests for information regarding it, and OPLR was unable to determine why it was removed.

¹⁹ OPLR Massage Survey (May 2024) See Appendix [3.2 Cost of Education](#)

²⁰ OPLR analysis on the cost and hours of massage programs in Utah in early 2024

federal loan.²¹ The vast majority of LMTs attend private massage programs, likely due to the lack of public programs in Utah.²² There is only one public technical college in Utah offering a massage program at a far less expensive rate of \$4k.²³

Hourly wages tend to fall around \$25-\$30,²⁴ far above Utah minimum wage, though the industry lends itself to part-time work with the majority of LMTs in Utah working fewer than 20 hours a week on average.^{25,26} Therefore, debt may be difficult for some to pay down, with nearly 25% of surveyed LMTs indicating they still had debt from their education.²⁷

Despite the costs of training, Utah has a robust supply of massage therapists. Utah is estimated by one national association to have the second-highest number of massage therapists per capita in the U.S.²⁸ The industry has grown significantly over the past 20 years and is expected to continue growing faster than average over the next decade.^{29,30,31}

The cost of massage education does not appear inflated due to state licensing requirements. Given the cost of education, there could be concern that the state-mandated education hours required for licensure are artificially high, thus increasing the cost of education unnecessarily. However, prior to the new federal 'gainful employment' rules for financial aid,³² many massage schools in Utah offered programs around 800 hours (above the state hours requirements) with strong student demand.³³ For OPLR, this suggests that students and employers valued the additional hours and that the licensing policy had not artificially inflated education hours or cost beyond market demand.

Utah stands as one of the most accessible states for those looking to enter the massage industry due to the multiple alternative pathways to licensure that do not exist elsewhere.³⁴ Apprenticeships offer an alternative to traditional massage programs, which may benefit those who require more flexibility in their hours or may not thrive in a fast-paced program catered to

²¹ OPLR Massage Survey (May 2024) See Appendix [3.2 Cost of Education](#)

²² OPLR Massage Survey (May 2024) See Appendix [3.1 Training](#) for more information on the types of training programs attended.

²³ [Bridgerland Technical College. Therapeutic Massage Program](#)

²⁴ DWS estimates the average wage is \$28.74, and [Indeed](#), [BLS](#), and OPLR's survey suggest somewhere between \$20-\$60 an hour-with \$20-\$30 most likely. Based on the DWS hourly median, the annual salary of a massage therapist is slightly above the median wage for Utahns across all occupations ([\\$59,457](#)); however, most massage therapists do not work full-time, making their practical annual salary lower than median.

²⁵ [Bureau of Labor Statistics \(2024\). Massage Therapists](#)

²⁶ OPLR Massage Survey (May 2024). See Appendix [3.3 Income and Hours Worked](#)

²⁷ See Appendix [3.2 Cost of Education](#) for more information on debt

²⁸ [ABMP \(2023\), How Many Massage Therapists are in the U.S.?](#)

²⁹ DOPL Licensing Data. See Appendix [3.4 DOPL Licensee Data](#)

³⁰ [Bureau of Labor Statistics \(2024\). Massage Therapists](#)

³¹ DWS rates the occupational outlook of massage therapy quite high, as it is "expected to experience much faster than average employment growth with a high volume of annual job openings." See: <https://jobs.utah.gov/jsp/utalmis/#/occupation/319011/report>

³² The Department of Education's new "Gainful Employment" (GE) regulations, [GE-24-03](#), for vocational programs require that, in order to receive Title IV funding, they must not exceed, in hours, the state's minimum-education hour requirement. It was amended from 150% of the state's minimum, to 100%.

³³ OPLR analysis on the cost and hours of massage programs in Utah in early 2024

³⁴ See Appendix [2.4 Massage Therapy Policy Scan](#) for a comparison of Utah's education requirements to nationwide education requirements

English speakers. The massage assistant license further increases the accessibility of the industry as a lower-burden, lower-cost alternative to full licensure, although no data exists yet to confirm this as DOPL only began licensing massage assistants in 2024.

Findings: Consumer Safety

The practice of massage therapy has the potential to cause multiple forms of harm. The therapist-client relationship in massage is uniquely and inherently vulnerable, reminiscent of that of a mental health therapist or physician. Massage often occurs one-on-one in a closed room, requires manual touching of an unclothed client, and may include work on particularly vulnerable client groups³⁵ or acute and subacute injuries. Common harms tend to fall within three categories: 1) sexual harm through abuse, assault, or misconduct towards a client by a therapist 2) harm from illicit activity such as labor trafficking or sex trafficking occurring under the guise of massage, and 3) physical harm to a client due to therapist negligence.

Sexual Misconduct

Sexual misconduct encompasses a wide spectrum of behaviors, from inappropriate touching to sexual assault, and is a primary concern within the massage therapy industry. Massage has the highest volume of sexual misconduct complaints among DOPL-regulated professions with over 50 substantiated complaints filed with DOPL in the last ten years. When adjusted proportionally for the number of licensees, it is still among the highest.³⁶ DOPL investigators noted that while sexual misconduct complaints may include unlawful or unprofessional consensual sexual acts, the majority of these complaints involved non-consensual behavior. The DOPL complaints likely underestimate the prevalence of misconduct, as clients may be reticent to bring forward claims of sexual assault and clients new to massage may be unsure whether or not their therapist crossed a professional boundary.³⁷ Utah is not unique in struggling with this issue. Around one-third to one-half of the malpractice claims for a prominent national massage insurance provider across a ten-year span resulted from sexual misconduct,³⁸ and massage boards in other states expressed similar concerns regarding the massage industry.³⁹ Massage chains across the United States have come under recent scrutiny for engaging in and enabling sexual assault.⁴⁰

The vast majority of massage therapists do not cause sexual harm to their clients. However, the environment necessary for the practice of massage therapy also creates an opportunity to impose sexual harm that does not exist in most other professions. Sexual harm is also unique in its severity. Other types of harm often have a wide range of severity, whereas any degree of

³⁵ Vulnerable groups include pregnant women, geriatric and pediatric clients, hospice patients, and those with chronic diseases

³⁶ DOPL Complaint Analysis (2024). See Appendix [4.1 DOPL Complaint Analyses](#)

³⁷ OPLR interview series

³⁸ Massage Malpractice Data from a prominent provider in the U.S.. This provider has since stopped covering sexual misconduct within their malpractice insurance.

³⁹ OPLR interview series

⁴⁰ [Bever, Lindsey \(2017\), "More than 180 women say they were sexually assaulted at Massage Envy franchise"](#)

sexual abuse is inherently severe and may cause extreme distress and long-lasting trauma.⁴¹

Illicit Massage Businesses

Illicit massage businesses (IMBs), establishments that “put on the façade of a legitimate massage business in order to facilitate commercial sex services”,⁴² cause significant harm to the public as hubs for sexual misconduct, unlicensed practice, and other illegal activities. IMBs are lucrative and widespread, with an estimated 13,000 businesses in the United States generating over \$5 billion a year in revenue.⁴³ IMBs often engage in other illegal practices such as money laundering and, most concerning, human and sex trafficking. Illicit massage and sex trafficking are inextricably linked; although some illicit massage is performed by willing and uncoerced individuals, trafficking within the industry remains common. The Polaris Project, a national nonprofit organization, ranked illicit massage as the second most common classification or business model for human trafficking,⁴⁴ and The National Human Trafficking Hotline ranked it as the most common venue for sex trafficking from 2007 to 2021. The U.S. Department of Justice’s 2022 National Strategy to Combat Human Trafficking also acknowledged the proliferation of IMBs, with the provision of training to dismantle the illicit massage industry as a key part of the plan.⁴⁵

Trafficking organizations bring individuals into the United States, lie to them or mislead them about the work they will be engaged in, and force them to work in illicit massage establishments. These trafficked individuals are largely at the mercy of the organizations and are often coerced into the commercial sex business through threats of deportation, loss of income, and shame.⁴⁶

In Utah, the problem of IMBs is widespread and growing.⁴⁷ The last few years have seen multiple high-profile busts of IMBs across Utah and Salt Lake counties,^{48,49,50,51,52} and DOPL alone investigated many complaints involving suspected illicit activity, with nearly 25% of “unlicensed practice” complaints involving law enforcement to some degree.⁵³ The Network, a non-profit organization whose focus is on fighting human trafficking in the illicit massage industry, has identified roughly 150 active IMBs in Utah as of May 2024.⁵⁴ Although the proliferation of IMBs in Utah pales in comparison to a few larger states, such as California, Texas, and Florida, Utah still ranks poorly compared to many other states, with the 17th highest

⁴¹ [Chen, Lauren P., et. al. \(2010\) Sexual Abuse and Lifetime Diagnosis of Psychiatric Disorders: Systematic Review and Meta-analysis](#)

⁴² [The Network. What is the Illicit Massage Industry](#)

⁴³ Ibid.

⁴⁴ [Polaris \(2019\), The Typology of Modern Slavery](#)

⁴⁵ [Department of Justice \(2022\), National Strategy to Combat Human Trafficking](#)

⁴⁶ [Polaris \(2018\), Human Trafficking in Massage Businesses: A Deeply Manipulated Sense of “Choice”](#)

⁴⁷ The Network estimates that, between 2019-2024, there has been a 9.89% compound annual growth rate for the volume of IMBs. For more on The Network and their data, see Appendix [4.2 The Network](#)

⁴⁸ [KUTV \(2024\), “Hundreds of ‘illicit’ Utah massage parlors suspected of prostitution, organized crime”](#)

⁴⁹ [KUTV \(2024\), “Lehi massage parlor under investigation on sex trafficking accusations”](#)

⁵⁰ [KSL \(2024\), “Owner of West Valley massage parlor charged with running prostitution business”](#)

⁵¹ [Fox 13 \(2021\), “Utah massage parlor bust exposes human trafficking in Salt Lake, Utah counties”](#)

⁵² [KSL \(2024\), “Man linked to prostitution at South Jordan massage parlor charged with 15 felony crimes”](#)

⁵³ DOPL Complaint Analysis (2024). Appendix [4.1 DOPL Complaint Analyses](#)

⁵⁴ The Network Data. For more information, see Appendix [4.2 The Network](#)

number of IMBs per adult male. The issue is mainly concentrated in Salt Lake County, which ranks 31st in the number of IMBs in comparison to over 3,000 counties across the United States. The Network estimates that there are more IMBs in Salt Lake County than in even larger metropolitan counties such as Philadelphia, San Francisco, and Denver.⁵⁵

The clearest harms from IMBs are through human trafficking and commercial sex. However, there are also instances of direct client harm in which clients unknowingly walk into an IMB expecting legitimate massage and are instead propositioned, harassed, or assaulted. IMBs also erode trust in the legitimate and beneficial practice of massage as they often operate through a convincing guise of legitimacy.

Physical Harm

OPLR found the risk of physical harm from trained massage therapists engaging in the legitimate practice of massage to be quite low overall, especially for healthy individuals. Existing data on harm is almost entirely limited to trained and licensed LMTs, such that OPLR cannot comment on the safety or the risk from the newer, lower-tiered massage assistant license or unlicensed massage.

A prominent malpractice insurance provider estimated that, in the past ten years, in any given year only 1 in every 650 massage therapists may have had a claim brought against them. The most common claims involve “strains/tears to muscles or ligaments, burns generally from administering hot stone treatment, fractures of bones, dislocations of bones or joints, and sexual misconduct”.⁵⁶ Although severe instances of physical harm do occur, it is very rare.⁵⁷ There are very few DOPL complaints related to physical harm,⁵⁸ and less than 5% of surveyed LMTs reported witnessing harm to a consumer in the last year.

Although the overall risk of physical harm is low, this risk differs based on context. Working with vulnerable clients necessitates more in-depth training in anatomy, physiology, pathology, contraindications, and massage techniques. Many massage modalities are contraindicated for certain health disorders and injuries treated through massage, requiring added care by a practitioner. As massage becomes more common as a treatment for pain, cancer and other health issues, the line between ‘lifestyle’ massage and ‘medical’ massage becomes less distinct. Practitioners cautioned that clients will seek out massage in a community setting for medical reasons, often without disclosing these to the practitioner, making knowledge of medical contraindications important for all practitioners.⁵⁹

Discussion

⁵⁵ Ibid.

⁵⁶ Massage Malpractice Data from a prominent provider in the U.S.

⁵⁷ OPLR analysis of the massage malpractice data

⁵⁸ Physical harm may be underreported in this space, as massage therapists pointed out that clients who are harmed tend to seek services elsewhere rather than report the offending LMT. Still, OPLR has no evidence to suggest **severe** harm is common in this industry.

⁵⁹ OPLR interview series

OPLR found the primary issues in the massage industry to be related to safety rather than access. Sexual misconduct by massage therapists and the proliferation of illicit massage businesses both cause severe harm and sow doubt into the legitimacy of the massage industry as a whole, thereby causing financial harm to legitimate practitioners. Although these problems cannot be entirely addressed by occupational regulation nor fully ascribed to failures in occupational regulation, OPLR posits that there are gaps in regulation that may compound these issues.

Utah's current licensing requirements do establish a solid base of oversight for individuals; an individual must consent to fingerprinting and a national background check before receiving any massage license, and DOPL may deny licensure for those with any charges relating to sexual assault, or other criminal behavior related to the practice of massage therapy. Additionally, an individual can have their ability to legally practice massage stripped from them should they engage in harmful behavior like sexual assault.

Despite these provisions, there are still gaps that may allow malicious actors to practice massage. Utah does not check licensing data from other states, nor do they have the ability to determine whether an active licensee has engaged in criminal behavior since being licensed - save for self-report. Thus, an individual may be an actively licensed massage therapist in Utah even if they have had their license revoked for sexual misconduct in another state or have been criminally charged for sexual assault after receiving their license.

Additionally, OPLR found that massage establishments and their owners in Utah may lack sufficient accountability given the growth and risk of IMBs. The current regulatory structure for establishments involves a disjointed array of municipal ordinances regulating massage establishments to varying degrees since no state-level regulation exists. Some municipalities require a municipal massage establishment license, an in-person interview, and compliance with a specific dress code, while others require only a basic license common to any business.⁶⁰ It is also difficult to analyze the degree to which these ordinances are enforced, given the varying resources available and the prioritization of concerns between municipalities. Even assuming a local jurisdiction is very aggressive in investigating and enforcing its local codes meant to impede illicit massage, IMBs may re-open in a nearby city relatively quickly. IMBs continue to receive licenses and permits that falsely legitimize and conceal their illicit business, indicating that systemic issues exist in this decentralized regulatory environment.

Finally, OPLR has determined that access to legitimate massage is not a primary concern for this review. The Utah legislature previously addressed the issue of higher education costs and a low risk of harm for healthy individuals through the creation of the massage assistant license, a lower-burden alternative whose scope does not include working on acute or subacute injuries.⁶¹ OPLR firmly believes it is in the best interest of public safety to refrain from further deregulation until there is enough data to analyze the efficacy and safety of the massage assistant license.

⁶⁰ Appendix [4.3 Utah Municipality Scan](#)

⁶¹ Appendix [2.3 Massage Therapy License Structure](#)

Recommendation 1: Create a Massage Establishment Registry

Recommendation

OPLR proposes that all massage establishments obtain registration through DOPL to legally operate within the state of Utah.⁶² Massage establishments should be defined as single, fixed locations wherein the practice of massage therapy occurs. Registration of massage establishments should require the following:

1. Proof of business registration with the Division of Corporations and business licensure from the municipality in which the establishment is located,
2. Assurance that physical facilities comply with safety and sanitation requirements as enforced by Utah's counties,
3. A copy of the lease or proof of ownership for the physical space,
4. Fingerprints and FBI background checks for all owners and managers of the establishment, if they are not already licensed massage therapists, and
5. A signed attestation from the business owner stating that the business will not engage in illegal activities, including human trafficking, sex advertising, prostitution, and unlicensed practice, and that such illegal acts will not occur on the premises of the registered massage establishment.

DOPL should deny registration if the location being registered has had a similar massage establishment license revoked or surrendered for cause in the last two years, the business or location has recently advertised on a sex-buying website, an owner has had their license revoked for cause, or an owner has a criminal conviction or pending criminal charges related to sexual assault, human trafficking, fraud, or any charge substantially related to the practice of massage therapy. DOPL should also be able to summarily suspend an active registration (and notify local authorities) if there is substantial evidence that the establishment is engaging in or allowing sexual misconduct, human trafficking or other illicit activities.

It should be unlawful for any massage establishment to:

1. Operate without a valid registration,
2. Permit or arrange for unlicensed practice or any sexual acts,
3. Conceal or house individuals within the establishment,
4. Advertise on sexually oriented websites or in a suggestive or explicit manner, and
5. Fail or refuse to report criminal activity to local police.

The penalty for such unlawful conduct should be severe, with fines up to \$10,000 per single violation and \$2,000 per day of ongoing violations at the discretion of an administrative law

⁶² Any massage therapist who holds 100% ownership in their business and employs no other therapists or individuals should be exempt from this requirement regardless of the location of their work. Exemptions should also include all healthcare and athletic training facilities.

judge. If DOPL finds an establishment in violation of the unprofessional or unlawful conduct provisions, individuals, depending on the nature of the violation, would have the ability to contest a citation, negotiate a stipulated agreement, or appear before an adjudicative proceeding.

Rationale

OPLR posits that regulating massage establishments may provide an effective tool, in conjunction with criminal law, to disincentivize, shut down, and hold accountable businesses engaging in or enabling illegal activity. Nearly half of the states in the U.S. have enacted legislation to regulate massage establishments.⁶³

State registration may increase accountability and transparency in the massage industry. A study conducted by Polaris of business records for known IMBs found that fewer than one-third named an actual person on the registration and fewer than one-fourth named an owner;⁶⁴ the proposed regulation should close that loophole. Requiring owners to provide verifiable identification and a clean background check should help ensure that a real individual is represented and held accountable for the operations of that business. This should reduce the ability of IMBs to obscure those truly responsible for engaging in and profiting from illicit activity while holding the appropriate party accountable instead of massage therapists who themselves may be victims. Even if a straw owner⁶⁵ is named, this regulation still holds accountable a critical party complicit in the illegal activities, which may provide a more compelling disincentive for these individuals than currently exists. The provisions may also incentivize owners to better vet and supervise employees, holding them accountable for failing to monitor and report employees to the police for sexual misconduct or other criminal behavior.

Registration may assist authorities in physically shutting down IMBs and disincentivizing them from opening under the guise of a massage establishment. Multiple case studies illustrate the efficacy of similar ordinances in reducing the number of active IMBs.⁶⁶ The recommended provisions could enable DOPL to immediately suspend registration given evidence of egregious unlawful conduct violations, as well as inform the local government, landlord, and even local police of these violations. DOPL's ability to levy high fines could prove the most effective deterrent. IMBs are incredibly profitable,⁶⁷ and paying the current fines due for unlicensed practice do not significantly impact their bottom line. The proposed fines, however, could significantly disrupt their ability to operate profitably.

Finally, the registry imposes a very minimal burden on the legitimate practice of massage. Registration and renewal will require a fee and additional documentation, but these are limited burdens for legitimate businesses. No establishment engaged in the legitimate practice of

⁶³ OPLR Policy Scan

⁶⁴ [Polaris. Hidden in Plain Sight: How Corporate Secrecy Facilitates Human Trafficking in Illicit Massage Parlors](#)

⁶⁵ A person who legally owns a business on the behalf of another, typically to hide the identity of the true owner. Law enforcement and DOPL investigators explained this is an incredibly common tactic within this space.

⁶⁶ [The Network \(2021\). Massage Ordinances Best Practices](#)

⁶⁷ [The Network \(2023\). Illicit Massage Financial Baseline](#)

massage should struggle to uphold standards of conduct, and no provision should impact day-to-day operations. State registration may also provide a stronger signal of legitimacy than exists currently, as the only reason for a business to not receive registration would be due to unlawful behavior or unlicensed practice.

Based on conversations with other jurisdictions implementing similar registries, the initial resourcing and implementation is critical. Please see [the Appendix](#) for key considerations.

Recommendation 2: Address gaps in oversight, transparency, and massage therapy education

In addition to the primary recommendation of regulating massage establishments, OPLR proposes the following to address both safety and access concerns.

To increase accountability for individual massage therapists, DOPL should:

- Join the Massage Therapy Licensing Database (MTLD)⁶⁸ for interstate licensing information
- Enroll licensees in the FBI Rap Back system for ongoing criminal database checks

The state should enact these low-burden, preventative measures to reduce the risk of licensing individuals with a known history of concerning behaviors (such as sexual assault) that would otherwise be missed in an initial background check. Joining the MTLD would provide DOPL access to a database containing licensing actions against LMTs among all participating states, while the FBI Rap Back system would immediately notify DOPL of any active licensee charged with a relevant crime (sexual assault, human trafficking, etc.). These recommendations would allow DOPL to more thoroughly screen and oversee licensees around the most serious types of consumer harm they see in their investigations without requiring any additional documentation or significant burden for the licensee.

To increase transparency for the public, DOPL should:

- Require licensees to disclose DOPL resources, including a code of ethics, and license number
- Require additional disclosure and intake forms for assistants and apprentices

To better address the issue of sexual misconduct, clients must understand when a massage therapist is engaging in unprofessional or unlawful behavior and know where they can submit a complaint.⁶⁹ Requiring disclosure could increase clients' confidence regarding the boundaries of ethical massage and empower them to reach out to DOPL when they have been harmed. Furthermore, there should be complete transparency for clients when they receive a massage

⁶⁸ The MTLD is run by the FSMTB. For more information, see [Appendix 5.2](#)

⁶⁹ DOPL investigators explained multiple cases of sexual assault where a client was hesitant to report their LMT because they were unsure whether a boundary had been crossed, despite their feelings of discomfort.

from an apprentice or assistant, given these licensees have less training and expertise than LMTs. Intake forms could help reduce the liability for these lower-tiered licensees and better protect the client, ensuring that licensees do not exceed their scope by practicing on individuals with otherwise undisclosed medical disorders or injuries they have not been educated to treat.

To address issues in education and supervision, DOPL should:

- Standardize the massage therapy instructor and supervision requirements by reducing the number of hours necessary to act in the capacity of a supervisor (from 6,000 to 3,000)
- Require a massage therapy license for those engaged in the instruction of hands-on massage training
- Reduce the number of apprentices per supervisor from 6 to 3 and place a 2-year maximum duration for the apprentice license
- Enable individuals to transition from the massage assistant license to the massage therapist license by allowing assistant training to be accepted toward the massage therapist license

Current education standards and supervision requirements for LMTs are both unnecessarily restrictive in some areas and not restrictive enough in others. Standardizing the instructor and supervisor requirements could help address this issue by reducing the excessive number of hours currently required to become a supervisor, while also requiring that those teaching the practice of hands-on massage be licensed LMTs themselves. There have also been concerns over the quality of apprenticeships.⁷⁰ 13% of current apprentices have been licensed as apprentices for over two years, despite only needing 1,000 hours for licensure.⁷¹ Reducing the number of apprentices per supervisor and allowing apprentices to remain licensed for only two years may help reduce the risk of exploitation of apprentices by supervisors and support their pathway to full licensure.

Finally, licensed massage assistants should be able to use a portion of their education hours towards the 600 hours required for the massage therapist license.⁷² Without this, individuals who have experience and education in massage are required to meet the exact same standards as those with no training or education, which OPLR deems unnecessary and restrictive.

Additional Considerations:

Along with the stated recommendations, OPLR supports the following policies:

- Translate DOPL materials into Spanish and Mandarin and engage in proactive outreach to these communities of practitioners.
- Further, clarify the scope of the massage assistant to not include any work according to

⁷⁰ OPLR interview series

⁷¹ DOPL Licensing Data

⁷² Any hours of education that a massage assistant receives where the curriculum is substantially similar to the curriculum in a massage therapist program should be counted towards the education requirement for the massage therapist license. The existing [Massage Therapy Education Peer Committee](#) could be tasked to determine this.

a treatment plan, or that is otherwise prescribed on behalf of a physician, physical therapist, or occupational therapist.

- Reevaluate the required hours for the massage assistant license once there is more data available on massage assistants. If few safety concerns are found, Utah could consider further deregulation of the practice of limited massage therapy. If significant safety concerns are found, Utah could consider additional requirements for massage assistants.

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1. Context

1.1 General Research Methodology

OPLR’s methodology seeks to combine qualitative and quantitative methods, ensuring robust stakeholder engagement throughout. To assess massage therapy licensure policies, OPLR engaged in the following:

- Administering and analyzing a survey that was sent to all actively licensed massage therapists in Utah
- Conducting quantitative analysis on DOPL licensee and complaint data and data shared with us by other groups (e.g., malpractice insurance data, IMB information)
- Reviewing academic literature related to massage therapy
- Engaging extensively with stakeholders from various state boards, industry organizations, non-profits, law enforcement, academics, massage school owners and leaders in massage education, massage therapists, and massage establishment owners
- Visiting a massage school and conducted multiple interviews with instructors and a focus group with students
- Reviewing massage establishment regulations and business ordinances in the 20 most populated Utah cities

1.2 OPLR Massage Therapy Survey

A. Survey overview

OPLR conducted this survey in May 2024 through Qualtrics. The survey was emailed to a list of all actively licensed massage therapists in Utah as of April 2024. The survey was open from May 8th to May 15th. The first email was sent on May 8, with follow-up reminder emails sent on May 11th and May 15th. Emails were sent to 7,570 accounts: 71 bounced and 5 failed. Emails and surveys were offered in English, Spanish, and Mandarin.

OPLR received 907 responses, for a response rate of about 12%, within the week it was open. Of these 907 respondents, 31 completed less than 5% of the survey, so they were completely excluded. Of the remaining 876 respondents, 849 (97%) completely finished the survey, while another 27 did not finish but were included to better reflect the true item response for each question.

The survey contained questions according to the following table. All survey data analysis was conducted in R.

Table 1. Utah Massage Licensing Survey: Data Collection Inventory	
License type	

State
ZIP Code
Age
Sex
Race
Ethnicity
Language
Highest level of education
Employment status
Employment type
Workplace type
Licenses held in other states
Time completed in apprenticeship
Time remaining in apprenticeship
Nature of apprenticeship payment arrangements
Cost of apprenticeship
Debt for apprenticeship
Apprenticeship hours by activity type
School type
Time to finish training
Year of initial licensure
Place of initial training
Total cost of training
Total Pell Grants received
Total federal student loan debt
Total private student loan debt
Remaining student debt
Hours worked per week
Personal annual income
Annual hours of continuing education
Opinion on CE effectiveness
Opinion on CE requirements for renewal
Resources used to access licensing information
Impact of language barriers on licensing steps
Knowledge of scope of practice

Experiences being asked to practice out of scope of practice
Personal knowledge of client harm
Nature of client harm
Effectiveness of classroom training
Effectiveness of hands-on training
Specialized populations worked with
Training for specialized client populations
Intake form items required
Body-contouring services provided

B. Survey Limitations

OPLR sent the survey to all massage therapy licensees so that survey results were not impacted by sampling bias. However, the response rate was slightly low, and the survey could have been impacted by non-response bias. OPLR conducted representativeness checks on the license type, age, and sex of respondents, and no group based on these variables was grossly under or overrepresented. See the table below for details. Still, there are characteristics OPLR could not check representativeness for, as DOPL data does not include that information (i.e. level of education, native language, type of employment). Bias can be introduced if those who chose to respond to the survey shared one of these characteristics in a way not representative of the true population. Offering the survey in multiple languages was an attempt to reduce this bias, but it may still exist.

Other possible limitations include measurement error, which occurs when questions do not accurately measure the variable interest due to errors in question design, and recall bias, where respondents misremember and inaccurately answer questions. Recall bias may explain the discrepancy between the survey and DOPL data on the average number of years licensed in Utah. It may also impact the estimates of hours worked per week, income, cost of training, and debt.

All of these potential errors may cause some variability or systematic bias, and the survey data should primarily be used to outline patterns and general trends rather than to provide exact estimates.

Table 2. Survey Representativeness ⁷³			
Variable		Survey	DOPL Data
License type	Massage Therapist	97.6%	97.4%
	Massage Assistant	2.4%	2.6%
Sex	Female	77.8%	82.4%
	Male	19.5%	17.6%
Years licensed in Utah	Mean	15.2	12.5
	Median	14.0	10.8
Age	18-20	<1%	<1%
	21-29	7.8%	11.2%
	30-39	24.0%	27.9%
	40-49	30.3%	27.7%
	50-59	20.3%	18.0%
	60+	17.1%	15.2%

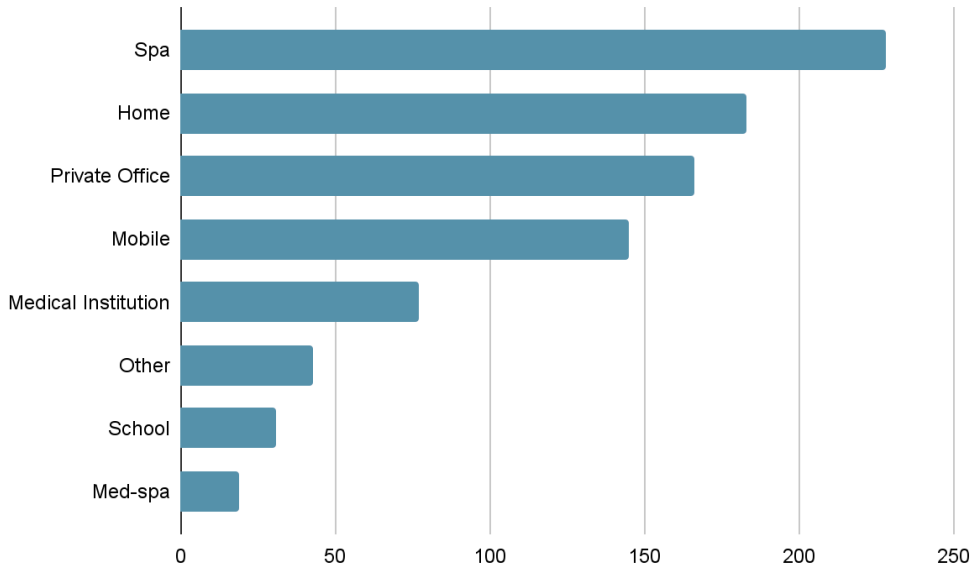
⁷³ This comparison is subject to a degree of error. There is a slight discrepancy in the number of active licensees; the survey was sent to over 7500 people (a list of active licensees), yet the DOPL data suggests only 7,338 active licensees as of that date. Despite potential issues with the DOPL data, this is the best data available on licensees. There may have been issues in the survey data as well, as respondents could have slightly misrepresented/misremembered when they were first licensed.

2. Background

2.1 Where Massage Occurs

National surveys of massage consumers and massage therapists suggest that massage primarily occurs within spas, massage therapist offices (in-home and in dedicated office space), and within client premises.⁷⁴ OPLR's survey found similar results.

Figure 1. Massage Therapy Survey: Workplace Type

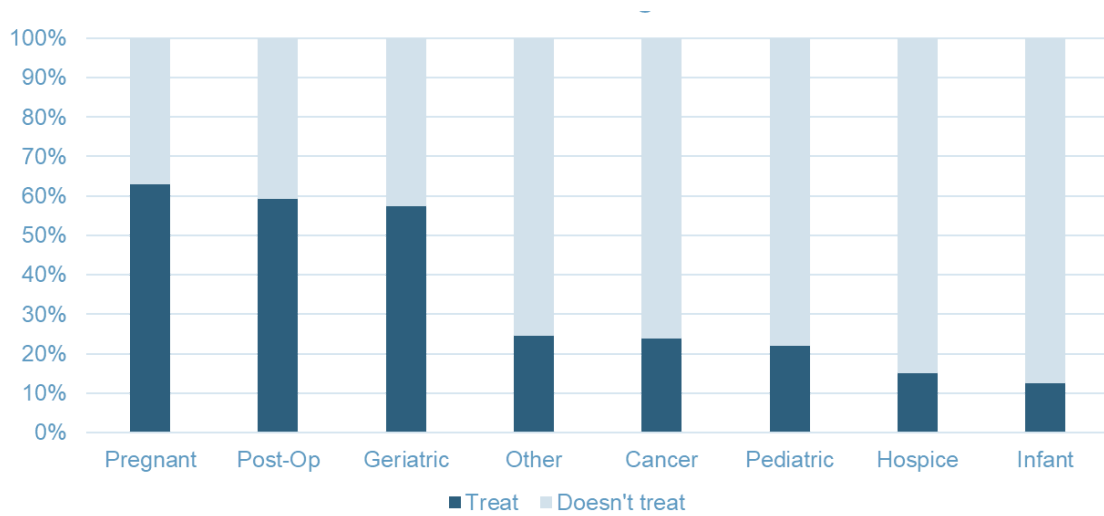


⁷⁴ AMTA 2024 Massage Profession Research Report

2.2 Medical Massage

58% of massage therapists surveyed indicated that they regularly worked on vulnerable individuals. The figure below illustrates the percentage of those massage therapists⁷⁵ who treat different types of vulnerable clients.

Figure 2. OPLR Massage Therapy Survey: Vulnerable Clients



⁷⁵ Only those massage therapists who indicated they served a vulnerable population were included in this analysis

2.3 Massage Therapy License Structure

Table 3. Massage Therapy Licenses

License Type	Scope of Practice	Requirements for licensure
Massage Therapist	<p style="text-align: center;">Full practice of Massage Therapy:</p> <ul style="list-style-type: none"> ● The examination, assessment, and evaluation of the body's soft tissue. ● The systematic manual or mechanical manipulation of the soft tissue of the body to enhance the circulation of the blood and lymph, relax and lengthen muscles, relieve pain, restore metabolic balance, achieve homeostasis, or for any other purpose ● Muscular corrections (without spinal adjustment) ● The use of rehabilitative procedures involving the soft tissue of the body ● Manual traction and stretching exercise ● correction of muscular distortion by treatment of the soft tissues ● counseling, education, and other advisory services to reduce the incidence and severity of physical disability, movement dysfunction, and pain ● activities and modality techniques similar or related to the activities and techniques described in this Subsection ● Animal massage (given 60 hours of training) ● providing, offering, or advertising a paid service using the term massage or a derivative of the word massage, regardless of whether the service includes physical contact ● Use of oil rubs, heat lamps, salt glows, hot and cold packs, or tub, shower, steam, and cabinet baths ● The use of the hands or a mechanical or electrical apparatus connected with any of the above acts 	<ul style="list-style-type: none"> ● 600 hours of education in an approved massage therapy program OR a 1,000 hours as a licensed massage apprentice ● Pass the MBLEx
Massage Apprentice		<p style="text-align: center;">Pass the Utah Massage Therapy Law and Rule Examination</p>
Massage Therapy Assistant (New)	<p style="text-align: center;">Limited Practice of massage</p> <ul style="list-style-type: none"> ● The systematic manual manipulation of the soft tissue of the body to enhance the circulation of the blood and lymph, 	<ul style="list-style-type: none"> ● 150 hours in an approved massage program or under <i>direct</i> supervision as a licensed massage assistant-in-training ● 150 hours in massage

Table 3. Massage Therapy Licenses

License Type	Scope of Practice	Requirements for licensure
	relax and lengthen muscles, relieve pain, restore metabolic balance, relaxation, or achieve homeostasis <ul style="list-style-type: none"> ● Practice using seated chair massage, body wraps, aromatherapy, reflexology ● The use of the hands, a towel, a stone, a shell, a bamboo stick, or herbal ball compress ● CANNOT treat acute or subacute injuries 	school or under <i>indirect</i> supervision as a licensed massage assistant in training <ul style="list-style-type: none"> ● Pass the Utah Massage Assistant Theory, Law, and Rule Examination
Massage Therapy Assistant in-training (New)		None

2.4 Massage Therapy Policy Scan

To better understand the licensing environment for massage therapy, OPLR conducted an extensive review of state regulation, first determining which states in the United States regulated the massage industry. OPLR then collected basic data regarding individual licensure/certification, including the minimum education hours, licensing fees, required exams, and the structure of the regulation. OPLR utilized state websites to access relevant statutes, rules, and licensing information, and verified with regulation mapping done by the FSMTB.⁷⁶

OPLR then chose a subset of 25 states, consisting of western states and states that regulate massage establishments, to conduct a more detailed and comprehensive analysis of state massage policy. For this subset of states, OPLR collected the following information for individuals and the following information for establishment licensure/certification:

- Massage Therapist: scope of license, required curriculum, fingerprinting and background check requirements, and other relevant policies.
- Massage Establishment: definition of massage establishment, requirements for licensure, standards of practice, exemptions, unlawful/unprofessional provisions, requirements for the establishment owner, fees, and information regarding the enforcement body.

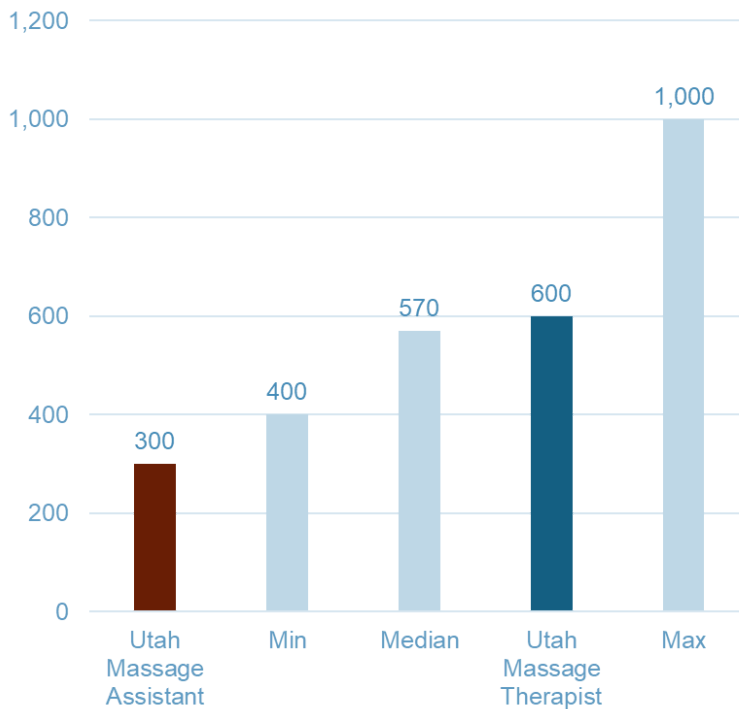
With the information collected, OPLR was able to calculate averages and find median, maximum, and minimum values for quantitative data fields (e.g., education hours, initial fees,

⁷⁶ [FSMTB. Regulated States](#)

annual CE hours) as well as determine the percent of states with certain policies (e.g., exam and education requirements). Running simple analyses such as these enabled OPLR to systematically map out the national licensing policy landscape to find patterns in regulation, make cross-state comparisons, and discover outliers. OPLR also used the data to help inform our recommendations.

As this review depended on manual entry of data fields, it may contain limitations related to normal human error. It is possible that there is slight misreporting of some data due to limited accessible state information or data entry errors. Potential bias or measurement error introduced by these limitations likely did not substantially alter any information, as the review was utilized more to find patterns than to report exact numbers.

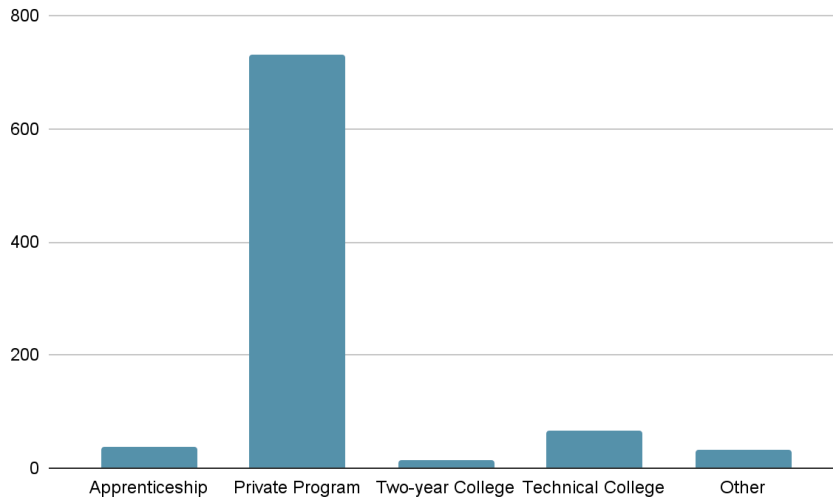
Figure 3. Minimum Hours for Massage Therapy Licensure, U.S. States and Territories



3. Findings: Access

3.1 Training

Figure 4. Types of Massage Training



3.2 Cost of Education

OPLR conducted basic quantitative analyses on the massage survey data to understand the costs, loans, and debts associated with massage training. To conduct these analyses, we re-coded non-numeric response options such as “less than \$1,000” and “over \$25,000” as a numeric estimate. For training costs, loan totals, and debt remaining, the calculations assumed that “Less than \$1,000” = \$500, and “More than \$25,000” = \$30,000. For Pell grant information, “None” was re-coded as 0, “Less than \$1,000” as \$500, and “\$15,000 or more” as \$18,000.

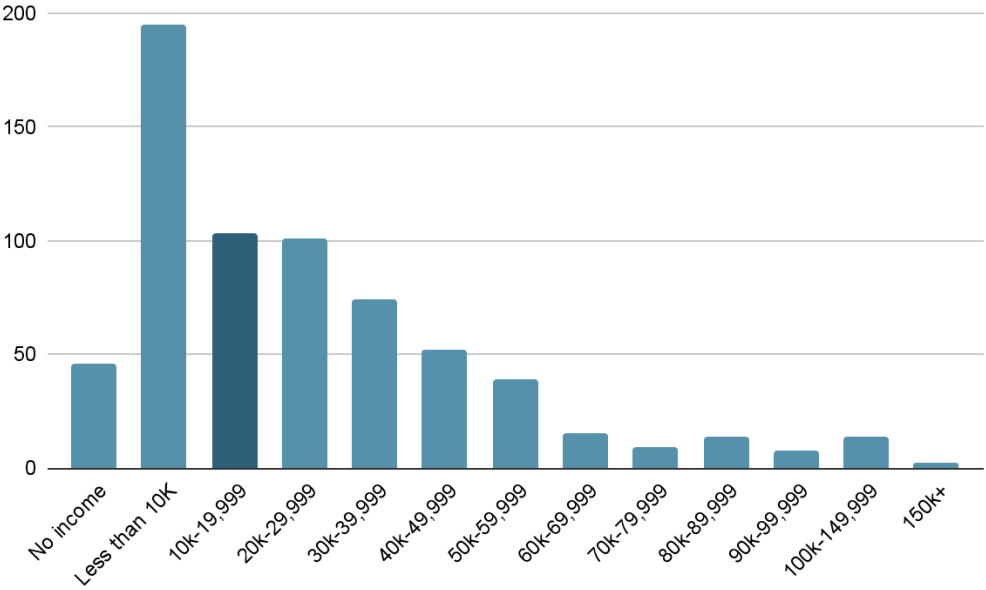
Estimates for the cost of training included all respondents who answered that survey item. Estimates for Pell grant, loan, and debt were calculated using only the respondents who indicated they had a Pell grant, took out a loan, or still had debt. The following table details these estimates along with the percent of the survey included to find the estimate.

Table 4. Median Training Costs ⁷⁷		
	Cost	% of survey respondents included
Cost of training	\$12,000	All
Pell Grant Amount	\$4,000	39% received a pell grant
Public Loans Taken Out	\$10,000	50% took out a public loan
Debt Owed	\$8,000	24% indicated they still owed debt on training

3.3 Income and Hours Worked

Income was calculated from respondents who indicated they worked, on average, at least one hour a week in the past year- about 74% of the total sample.

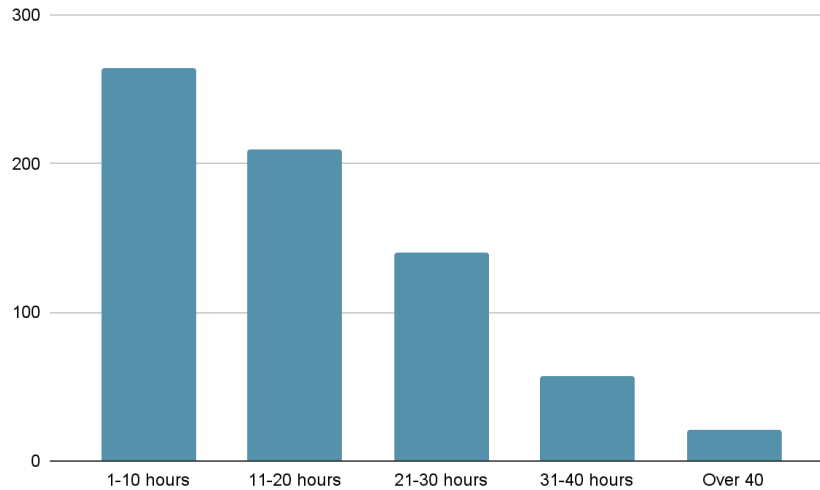
Figure 5. Income from Massage in 2023



⁷⁷ In nearly every case, the median was extremely close to the mean. The average cost of training was \$11,825, the average public loan amount taken out was \$9829, and the average debt still owed was \$9,058.

The median income from the practice of massage therapy was 10k-19,999. Although this appears extremely low, the hours worked per week for respondents were also very low, with a median of 15 hours.⁷⁸

Figure 6: Average number of hours worked per week in 2023



As can be expected, income varies depending on the number of hours worked.

Table 5. Median Income by Hours Worked	
Hours Per Week	Income
1-10 hours	Less than \$10,000
11-20 hours	\$20,000 - \$29,999
21-30 hours	\$30,000 - \$39,999
31-40 hours	\$40,000 - \$49,999
More than 40 hours	\$50,000 - \$59,999

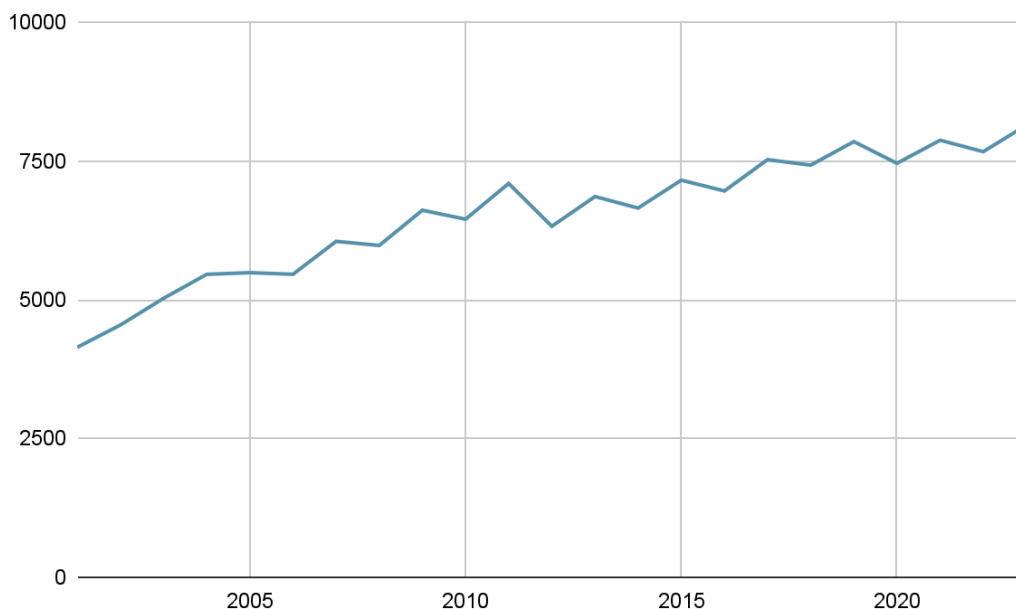
⁷⁸ Data note: This estimate excludes those who indicated they worked an average of 0 hours per week in the past year, and the answer option “40+” was re-coded to 50 hours a week. The median did not change when “40+” was re-coded to 45 rather than 50.

3.4 DOPL Licensee Data

OPLR used DOPL licensee data queried in June of 2024 to conduct analyses on the number of licensees per year and to determine the demographic data included in the survey representativeness table. The dataset included individuals first licensed in 1983 to those actively licensed as of June 2024. Each row in this dataset was a unique combination of individual and license type and contained information regarding when the license was issued, the status of the license, the date the status was last updated, and the sex and year of birth of the individuals. OPLR estimated the number of licensees in each year by summing up the number of unique individuals whose licenses were active during any point in each year. This means that, at any given date within that year, there may have been fewer active licensees than the estimate in the following figure. Additionally, OPLR excluded any individual with a null or incorrect value for their license issue date and license expiration date, as OPLR could not determine how long or for what years they were actively licensed.

The number of massage therapists in Utah has grown 62% over the past 20 years, and despite plateauing between 2019-2023, growing only 4%, BLS projects that the employment of massage therapists will grow 18% over the next decade.⁷⁹

Figure 7: Licensed Massage Therapist Growth from 2001-2023



⁷⁹ [BLS \(2024\). Massage Therapists](#)

4. Findings: Safety

4.1 DOPL Complaint Analyses

The Division of Professional Licensing (DOPL) receives complaints from aggrieved individuals, other state agencies, co-workers, professional associations, and licensing boards. They are legally required to “investigate unlicensed practice in regulated professions, acts or practices inconsistent with recognized standards of conduct, allegations of gross negligence or incompetence, and patterns of gross negligence or incompetence”. Violations that meet the criteria for investigation are then prioritized and assigned to an investigator. DOPL may resolve investigations in a variety of ways, including closing an investigation due to a lack of evidence; referring the case to another agency or to law enforcement if appropriate; carrying out informal or formal administrative sanctions or stipulated agreements; issuing a citation; or denying, suspending, or revoking an individual’s license.⁸⁰

To analyze complaints sent to DOPL, OPLR used My License Office (MLO) to access closed complaints investigated by DOPL between 2014-2022 for **all** licenses/professions. This data contains information on the license name, the complaint type, and the disposition of the complaint, among many other data fields not relevant to this analysis. OPLR then worked with DOPL personnel to code the complaint dispositions as either substantiated or unsubstantiated. Substantiated complaints are those where the disposition includes some type of disciplinary action (e.g., letter of concern, verbal warning, surrender of license), whereas unsubstantiated complaints have dispositions without a disciplinary action (e.g., dismissed, lack of evidence, unfounded).

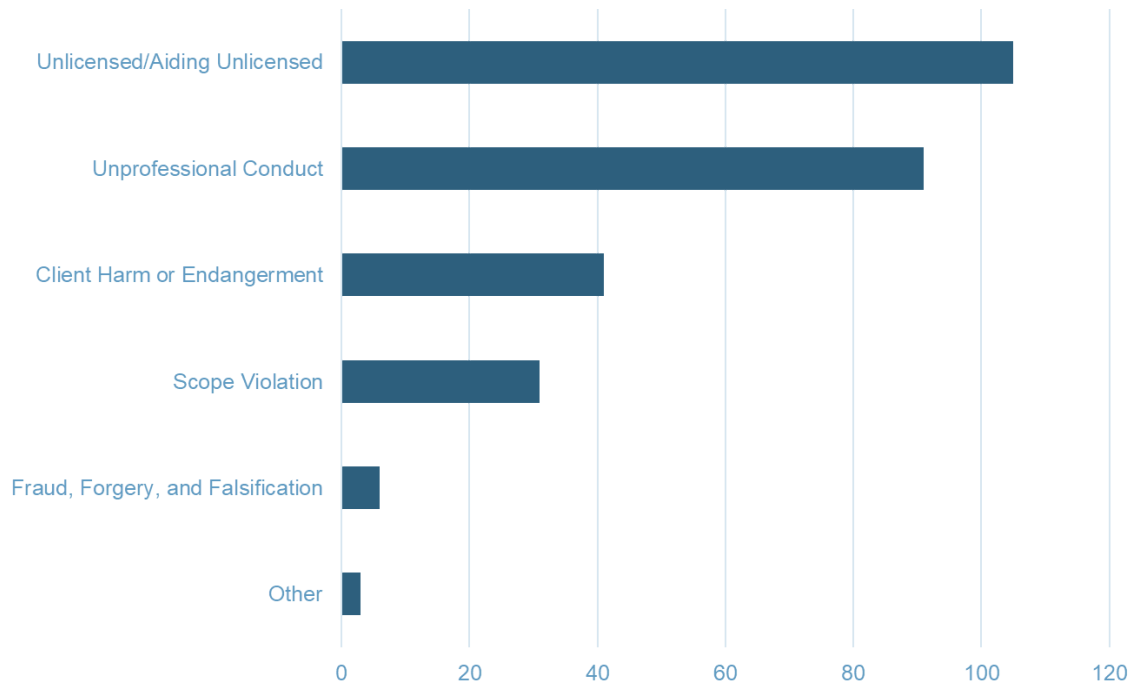
Complaints were filtered to include only those that were substantiated, and OPLR then calculated the number of complaints per license and per profession. OPLR roughly estimated the complaint rate for each profession by dividing the number of substantiated complaints by the average number of licensees across the same time period. This may overestimate the true complaint rate for all professions, as it is not an accurate estimate of the distinct number of individuals licensed in each profession over that time period. Therefore, these rates were used to understand general trends across professions rather than provide exact estimates. OPLR specifically looked at sexual misconduct complaints, both the raw number and the rate, to contextualize the issue within the massage industry. Massage therapy has the highest number of substantiated sexual misconduct complaints compared to all other professions and among the highest rate of complaints.

OPLR also analyzed massage complaint data from a 5-year period, 2017-2022, to better understand the types of complaints and potential for harm specific to the massage profession. To do this, OPLR used DOPL’s pre-existing complaint type variable to categorize the complaint types into 6 primary, consolidated categories: 1) financial/administrative, 2) client harm or

⁸⁰ Bureau of Investigation, Division of Professional Licensing (n.d.). Complaint Process: An Explanation of the Complaint Handling Process for the Division of Occupational and Professional Licensing. [online] Utah.gov. Available at: <https://www.utah.gov/pmn/files/438013.pdf>

endangerment, 3) scope violations, 4) unlicensed/aiding unlicensed, 5) fraud, forgery, and falsification, and 6) others. The figure below illustrates the findings.

Figure 8. DOPL Substantiated Complaints for Massage (2017-2022)



95% of the “client harm or endangerment” complaints are related to sexual misconduct.

A more detailed analysis of historical case notes was conducted on a sample of complaints closed between 2014-2022. DOPL investigators filled out additional information on a stratified random sample of 100 substantiated complaints. The information included whether or not unlicensed or out-of-scope practice occurred, if the complaint likely resulted in sexual, financial, or physical harm, the setting, and the length of time the individual was licensed when the complaint occurred. Investigators also included information regarding police/AG office involvement in an additional note section, explicitly mentioning that in 12/49 cases regarding unauthorized/aiding unlicensed practice, there was police involvement.

There are significant limitations to this analysis, and the information collected should not be misconstrued as an exact or accurate estimate of the harm done by massage therapists. DOPL data likely underestimates true harm, as many instances of harm will never be reported or investigated, and there is likely a proportion of unsubstantiated complaints resulting from instances of real client harm where the client was unable to produce the necessary evidence. Additionally, there could be latent factors correlated with both the likelihood of complaint and the profession, systematically biasing the comparison across professions. For example, people may be less likely to report a doctor for sexual misconduct than a massage therapist, due to an even greater power differential, thereby inflating the appearance of the issue in massage therapy.

4.2 The Network

The Network is a 501(c)3 non-profit, intelligence-driven, counter-human trafficking organization focused on the illicit massage industry. It tracks IMBs across the nation, researches IMB business methods and organizational structures, and engages with various partners and stakeholders to disrupt and dismantle these illegal operations.

The Network scrapes data from multiple massage-specific sex-buying websites, collecting business information (i.e., address, name, etc.), illicit reviews, and advertising details, to “collect and synthesize the online footprint of IMBs”.⁸¹ This data provides information on the number of active IMBs and the growth of the industry over time for any given geographic area, from nationwide to city-specific. They partner with “local, state, and federal law enforcement, regulatory authorities, anti-trafficking service providers, and community-based organizations”, to “help partners grasp the scope of the problem, inform and prioritize a strategic approach, and measure and evaluate the impact of disruption efforts over time.”⁸²

OPLR connected with the Network multiple times and obtained a list of all active IMBs within the state as of May 2024, as well as information regarding the growth of the industry between 2020-2024. The Network also sent us data concerning the number of IMBs within other states and counties to help contextualize the issue in Utah.

The data should not be interpreted as an exact, fully accurate estimate of the number of IMBs in the state. The data collection methods are inherently limited; only IMBs reviewed or otherwise posted on these illicit sex-buying sites will be noted in the data. Other estimates may differ from the number identified by the Network, as this data may underestimate the true number of IMBs.

4.3 Utah Municipality Scan

To better understand massage establishment regulation in Utah, OPLR reviewed ordinances related to the operation of massage businesses in the 20 most populated cities.⁸³ OPLR determined whether or not a city required a specific certification or license to operate a massage establishment and collected data regarding requirements for licensure (both for general business licensure or specific massage licensure), practice requirements, unlawful and unprofessional behavior, penalties, and the enforcement bodies. 8 cities did require a specific massage therapy or massage establishment certification/license to legally operate, while the remainder only required a business license. The requirements for licensure, practice standards, and unlawful/unprofessional conduct all varied substantially between cities.

⁸¹ [The Network, Data Sharing](#)

⁸² Ibid.

⁸³ The twenty were chosen based on this source: https://www.utah-demographics.com/cities_by_population

5. Recommendations

Recommendation 1: Create a Massage Establishment Registry

5.1 Key Considerations:

The Division of Professional Licensing (DOPL) should be the organization responsible for regulating massage establishments. DOPL regulates massage therapists, and the investigators who work on massage cases would be immediately ready to work on massage establishment cases due to their familiarity with the industry and with IMBs. No other office or division besides law enforcement has as much relevant knowledge and experience. Additionally, they have connections with many local police departments across the state.⁸⁴

Resourcing the screening process is critical. It is much more effective to prevent IMBs from receiving registration than to later revoke and shut them down after they have been granted registration.⁸⁵ Although it takes more effort upfront, it could save time, money, and effort in the long run. OPLR recommends the following for the screening process:

- DOPL should partner with The Network, which will greatly assist them in the screening process, due to the establishment-level data already available.
- Revenue from the massage establishment registration fee should resource, at least for the first year or two, an investigator who can also work as a licensing technician. This individual should work with the current massage investigators, who are deeply familiar with the issues in this space and relevant information regarding IMBs in Utah. This inspector should be responsible for any work that requires searching potentially sensitive information and for visiting physical locations in instances where it is deemed necessary.

Sustained enforcement by DOPL (in coordination with local authorities) is required. Failure to prioritize appropriate resources may allow for IMBs to re-enter the space,⁸⁶ and massage establishment regulation could end up causing harm by legitimizing these illicit businesses via registry.

HSI offers free training on human trafficking red flags and the FSMTB has published literature on the red-flags that can be identified through the licensing process.⁸⁷ DOPL licensing technicians should be trained and familiar with any human trafficking best practices.

When DOPL determines an establishment has engaged in an unlawful act, letters of concern

⁸⁴ OPLR interview series

⁸⁵ OPLR interviews with The Network and with state and municipal licensing agencies currently regulating massage establishments **highly** emphasized the necessity of resourced screening. It was a key aspect of implementation they claimed as critical to the success of this recommendation.

⁸⁶ The Network, 2021. [Massage Ordinances Best Practices](#)

⁸⁷ [Candler, Lorna, and Persinger, Debra \(2022\). A Toolkit for Identifying Human Trafficking and Fraud in Higher Education](#)

should be sent to the municipality's business and licensing office⁸⁸ and the landlord or property manager of that physical location. These letters/communications should urge the municipality to revoke the business license and for the landlord or property manager to evict the tenant on behalf of unlawful behavior, which is likely strictly against their lease agreement. Should the landlord comply and work with the division, DOPL could consider exempting that location from the prohibition that a massage establishment cannot open in that physical location for two years, so that the owner is not unduly punished. The Network can assist in establishing a landlord-engagement program.⁸⁹

DOPL should readily share information with all levels of law enforcement across the state to help them criminally charge IMB operators. OPLR's research found that the current regulation of massage establishments is disjointed across these levels, and DOPL could facilitate a more seamless information exchange.

Sole practitioners should be exempt from the requirement to register as a massage establishment, so long as they do not employ and/or contract with any other individuals, licensed or not. Their individual massage therapist license should hold them sufficiently accountable for engaging in illegal activities.

If a sole practitioner rents office space to other sole practitioners, the sole practitioner who primarily owns or leases the space should register as a massage establishment. However, their location should not be subject to the two-year prohibition if one of their lessees is found to be engaging in illegal activity, so long as they do not have a history of illicit activity occurring within the premises, and keep (and have readily available) a copy of both the rental agreement and each sole practitioner's active massage therapist license

Recommendation 2: Address Gaps in Oversight, Transparency, and Massage Therapy Education

5.2 The MTLT

The Massage Therapy Licensing Database (MTLD) is a "comprehensive, national database of licensed massage therapists that facilitates information sharing between state massage regulatory boards and agencies,"⁹⁰ facilitated by the Federation of State Massage Therapy Boards (FSMTB). States that participate in the MTLT will have access to a database containing licensing, education, and exam information for all licensed massage therapists in those participating states. This interstate data sharing enables states to readily access information regarding the background of a massage therapist who would not otherwise show up on a criminal background check and identify potential red flags regarding education fraud, human trafficking, and a history of sexual misconduct.

⁸⁸ The municipality in which the establishment is located

⁸⁹ [The Network, Landlord Engagement](#)

⁹⁰ [FSMTB, Member Services](#)

6. Stakeholder Outreach

6.1 OPLR Interview Series

OPLR relied heavily on stakeholder engagement and qualitative interview data to conduct this review and develop our recommendations. OPLR engaged with massage therapists, massage establishment owners, law enforcement, national massage industry organizations, non-profits, massage boards and regulators in various states, academics, massage school owners, DOPL investigators, and Utah regulators. OPLR prioritized diversity in perspective and relevance to the industry in determining which stakeholders to contact in order to gain the greatest understanding of the industry as possible given time constraints.

Interviews were conducted in person, over the phone, and via video conferencing using semi-structured interview methods; they were conducted one-on-one and with multiple members. Extensive notes were taken for all interviews and transcripts were retrieved for all interviews that took place with video conferencing. All notes and transcripts were reviewed multiple times.

Initial interviews were conducted to understand the massage industry, determine the largest issues within the industry as they related to safety and access, and identify ideas for change. Based on these findings, OPLR formed a set of preliminary recommendations then sought feedback and workshopped these recommendations extensively and iteratively with many stakeholders in groups of varying size. OPLR reflected on and synthesized feedback across multiple discussion sessions to develop clear and achievable evidence-based recommendations.

Limitations

This interview sample was not randomly selected and, therefore, is not completely representative. OPLR spoke to individuals most likely to represent the broad aims and concerns of their groups. Additionally, OPLR did not contact “consumers” of massage therapy (i.e. massage therapy clients), so their perspectives were not incorporated into this review. Thus, the stakeholder engagement and findings from these interviews cannot and should not be understood to be fully representative of the views of all Utahns, massage therapists, massage establishment owners, or any other person, group, or population.

Table 6. Stakeholder Engagement

Utah State Legislature	
Utah House of Representatives	Rep. Melissa Ballard Rep. Kera Birkeland Rep. Ariel Defay

	<p>Rep. Cory Maloy Rep. Tom Peterson Rep. Angela Romero Rep. Norman Thurston</p>
Utah Senate	<p>Sen. Heidi Balderree Sen. Curtis Bramble Sen. James Dunnigan Sen. Luz Escamilla Sen. Evan Vickers</p>
Other Utah Government Stakeholders	
Department of Commerce	<p>Margaret Busse, Executive Director Jacob Hart, Deputy Director Carolyn Dennis, Deputy Director Mark Steinagel, Director, Division of Professional Licensing Deborah Blackburn, Assistant Division Director, Division of Professional Licensing Kirsten Shumway, Legal Analyst, Division of Professional Licensing David Wright, Bureau Manager, Division of Professional Licensing Allyson Pettley, Bureau Manager, Division of Professional Licensing Lisa Martin, Bureau Manager, Division of Professional Licensing Mark Baca, Investigator, Division of Professional Licensing Jack Guenon, Investigator, Division of Professional Licensing Marla Winegar, Manager, Division of Consumer Protection Nate Woodward, Compliance Specialist, Division of Consumer Protection Adam Watson, Division Director, Division of Corporations and Commercial Code Scott Whittaker, Manager, Division of Corporations and Commercial Code</p>
Division of Professional Licensing (DOPL) Massage Therapy Board⁹¹	<p>Maile Tau'A-Roberts, Chair, LMT Benjamin Smith, LMT, Wellness Education Research and Training Coordinator at Huntsman Cancer Institute</p>

⁹¹ This is reflective of the past board makeup before it was combined with the Acupuncture board. The chair is the same.

	Anita Egbert, LMT
Salt Lake County Health Department	Cooper MacCourtney Jorge Mendez
Other State Government Stakeholders	
Maryland State Board of Massage Therapy Examiners	Sharon Oliver, Executive Director
Nevada State Board of Massage Therapy	Elizabeth Barnard, Executive Director
Florida Department of Health	Eliana Swanson, Chief, Investigative Services Unit Division of Medical Quality Assurance Matthew Knipsel, Central District Manager, Investigative Services Unit Division of Medical Quality Assurance
Oregon Board of Massage	Jeff van Laanen, Compliance and Licensing Manager
City of Aurora, CO	Trevor Vaughn, Manager of Licensing
Idaho Division of Occupational and Professional Licenses	Skip Liddle, Investigations Program Manager, Occupational Licenses Bureau,
Industry Stakeholders	
The Federation of State Massage Therapy Boards (FSMTB)	Mai Lin Petrine, Director of Legal and Regulatory Affairs Ashley Hernandez, Government Relations Manager
The Network	Margaret Larson, COO Julia Wilson, Product Manager
American Massage Therapy Association (AMTA)	Dave French, VP Market Research Christine Hooper, Manager, Legislative and Regulatory Affairs James Specker, Senior Director, Industry and Government Relations
Associated Bodywork and Massage Professionals (ABMP)	Lance Hostetter, Director of Government Relations Spencer Bellott, Risk Manager
Utah Massage Therapy Education Programs (public and private)	Randall Nikola, founder of Healing Mountain Massage, past DOPL Massage Therapy Board Chair, member of the Massage Therapy Education Peer Committee Cheri Gillham, Head Instructor, Bridgerland Massage Therapy

	<p>Jesse Nikola, President and CEO, Healing Mountain Massage</p> <p>Jeremy Kellum, School Director, Healing Mountain Massage</p> <p>Rebeca Farraway, Owner and CEO, Zion Massage College</p> <p>Diana Young, CEO, Renaissance College Massage Program</p> <p>Bridgerland Instructors and students as of May 2024</p>
Business Owners/Employers/Practitioners	<p>Greg and Diano Lovato, The Spa Lounge</p> <p>Roger Olbrot, LMT, R&R Bodyworks, Massage Therapy Education Peer Committee Chair</p> <p>Bijan Hosseini, LMT, Yugen Wellness Center</p>
Law Enforcement	
Local Law Enforcement	<p>Jeremy Weirick, Detective, West Valley City</p> <p>Gabe Bier, Community Supervisor, West Valley City</p> <p>Elizabeth Johnson, Sargeant, Salt Lake City</p> <p>Pat Evans, Lieutenant Criminal Investigations, Draper</p>
Homeland Security Investigations	<p>Nick Minckler, Special Agent</p> <p>Brandon Crane, Special Agent</p>
Utah Attorney General’s Office SECURE Strikeforce	<p>Mick Spilker, Special Agent</p>
Subject Matter Experts	
Huntsman Cancer Institute	<p>Mark Rapaport, CEO, Huntsman Mental Health Institute</p>

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