



Board of Physicians

Wes Moore, Governor · Aruna Miller, Lt. Governor · Harbhajan Ajrawat, M.D., Chair

2026 SESSION POSITION PAPER

BILL NO.: HB 1527 Complementary and Alternative Health Care - Practice Authorized (Complementary and Alternative Health Care Practice Act)
COMMITTEE: Health
POSITION: Letter of Opposition

POSITION AND RATIONALE:

The Maryland Board of Physicians (the Board) respectfully opposes House Bill (HB) 1527. This bill authorizes an individual to practice complementary or alternative health care in the State without obtaining a license, certification, or authorization issued under certain provisions of law. The bill also establishes requirements and limitations on the practice of complementary or alternative health care and provides that certain provisions of this Act do not waive certain claims for relief.

While the Board supports patient autonomy, this bill creates a concerning regulatory process by authorizing unlicensed individuals to perform alternative health care services without the educational and safety standards essential to protecting Maryland's citizens.

HB 1527 expands the definition of health care to include vaguely defined practices such as detoxification, colostrum therapy, and non-invasive instrumentalities. By authorizing these practices without a license, the bill bypasses the Medical Practice Act and could lead to dangerous interpretations. Most concerning is the bill's failure to address the prohibition on medical diagnosis. Diagnosis is an important pillar in ensuring safe medical practice. Allowing unlicensed and untrained individuals to identify health conditions creates a high risk of misdiagnosis or the dangerous delay of necessary conventional treatment. Another significant concern is that the bill does not establish minimum educational or training qualifications; instead, it relies on practitioners to provide clients with written notice of their credentials, regardless of whether they have a clinical background.

The bill prohibits unlicensed practitioners from recommending discontinuation of prescribed medical treatments. In monitoring these private interactions, Board resources will be exhausted as the Board attempts to investigate and verify them when a patient's health fails. A documented surge in complaints about unlicensed practice underscores this administrative burden. The Board has handled 19 of these cases in 2021, 18 in 2022, 29 in 2023, 22 in 2024, and 34 in 2025. With 23 complaints already filed in the first few months of 2026, the Board is on pace to exceed the number

of unlicensed complaints in past years. For example, the Board recently charged an unlicensed individual, Dominic L. Diggin, for repeatedly violating a Cease and Desist Order by misrepresenting himself to the public as a physician, physician assistant, and resident in a cardiothoracic department. Mr. Diggin used social platforms to diagnose and treat individuals and to respond to medical questions, while falsely claiming affiliations with prestigious medical institutions. Even more concerning is the case of Pramit Jitesh Patel, an individual who never held a medical license yet misrepresented himself as an orthopedic surgeon with forged medical licensure credentials. Cases like these illustrate how unlicensed individuals can exploit vague titles to diagnose and treat Maryland citizens for procedures they are not sufficiently trained or licensed to provide.

Historically, these investigations have uncovered egregious cases where unlicensed individuals caused significant harm to patients by misrepresenting themselves as licensed professionals and providing dangerous clinical advice. Operationally, the Board would likely require additional counsel and investigators to manage the inevitable surge in complaints and the complex antitrust reviews required by the Office of Administrative Hearings (OAH) whenever a licensing board takes action against these practitioners. With all this said, if passed, HB 1527 will create an investigative burden for the Board.

This legislation effectively deregulates naturopathic doctors as a licensure field. In doing so, this would allow anyone to practice naturopathy without the rigorous vetting currently required. From a public protection perspective, this bill signals that qualifying for a health occupations license is no longer required or essential. This undermines the integrity of Maryland's health occupation boards and places the burden of vetting a practitioner's safety solely on Maryland residents.

In summary, HB 1527 prioritizes deregulating complex health services at the expense of patient safety. By removing the requirement for professional licensure, the bill would erase the standards of competency and accountability that Maryland residents rely on when seeking health care in this State. The Board would be unable to fulfill its mission to protect the public if it were forced to operate within a framework in which individuals with no accredited training and no regulatory oversight perform medical diagnosis and therapy.

Thank you for your consideration. For more information, please contact Oriell Harris, Health Policy Analyst, at OriellT.Harris@maryland.gov.

Sincerely,



Harbhajan Ajrawat, M.D.
Chair, Maryland Board of Physicians

The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.