



March 16, 2026

Delegate Heather Bagnall, Chair  
House Health Committee  
6 Bladen St., Rm. 240  
Annapolis, MD 21401

**RE: Comment in Opposition to House Bill 1527 – Alternative Health Care**

Dear Chair Bagnall and Members of the House Health Committee:

The Federation of State Massage Therapy Boards (FSMTB®) is a 501(c)(3) not-for-profit association with membership comprised of 47 massage therapy government licensing boards and agencies in the U.S. and its territories. Our mission is to support the member boards in their work to ensure that the practice of massage therapy is provided to the public safely and competently. We do this by providing education, research, best practices, and sharing the collective wisdom of massage therapy regulators from across the country. **The Maryland Board of Massage Therapy Examiners (Board) is a member of the FSMTB.**

Massage therapy regulation is in place to protect the public in a multitude of ways, one of which is by countering licensure fraud and human trafficking within illicit massage businesses (IMBs). IMBs are establishments that put on the façade of a legitimate massage business to facilitate commercial sex services. **HB 1527 raises concerns that it will exacerbate human trafficking and the proliferation of IMBs because of the lack of specific definition for “alternative health care.”** Nefarious actors will exploit this regulatory gap by identifying or labeling their practice as “alternative health care” to exempt themselves from Board requirements to meet entry-level standards of safety and competence to practice.

For example, an IMB that currently operates under the guise of a massage therapy establishment would be able to continue, without any oversight, by identifying itself instead as a ‘bodywork parlor.’ **This bill would significantly limit the authority of the Board (and law enforcement) in these scenarios, rendering it unable to protect the public.** Traffickers will continue to exploit their workers by identifying their business as an “alternative health care,” such as acupressure, reflexology, traditional oriental practices, healing touch, healing practices, or bodywork, which may currently be within the authority of the Board. These trafficked workers are also part of the “public” that needs protection and allowing a carve out will reduce the opportunity for intervention to support these trafficked victims.

In addition to ‘opening the flood gates’ for traffickers, this bill language is extremely vague, as mentioned before, by not defining precisely what is included in “alternative health care.” This will in turn cause issues with Maryland’s licensing boards as many of the listed modalities may share similar scopes of practice with the regulated professions and could lead to claims of the licensing board’s decisions as being arbitrary and capricious.

**With no objective definitions included, this bill could potentially be used to justify the unlicensed practice of almost *any* modality, based on a subjective interpretation of the practitioner.**

While the intent of this legislation may be to increase access to health care, we would ask whether increasing access to poor-quality care that could cause harm or be illicit activity the optimal solution? Is access to care that could cause harm truly access to care at all? This bill will create a large gap that nefarious actors will inevitably exploit at the expense of public safety.

**FSMTB would urge the Committee to vote no on HB 1527 to allow the Board to continue oversight of all massage therapy modalities, further the protection of the public, and promote the health, safety, and welfare of Maryland Residents.**

Thank you for the opportunity to offer comments. Should you have any questions or concerns please feel free to contact the undersigned at [mlpetrine@fsmtb.org](mailto:mlpetrine@fsmtb.org) or 913-681-0380.

Sincerely,

A handwritten signature in blue ink that reads "Mai Lin Petrine".

Mai Lin Petrine, JD

Director of Legal and Regulatory Affairs