April 10, 2025

The Honorable Members of the Massachusetts House of Representatives  
Committee on Consumer Protection and Professional Licensure  
State House  
24 Beacon Street  
Boston, MA 02133

Dear Members of the Committee on Consumer Protection and Professional Licensure,

As a practitioner of qigong—a holistic Chinese practice fostering health through movement, breath, and meditation—respectfully opposes House Bill No. 422, "An Act relative to creating a voluntary licensure pathway for traditional Asian bodywork therapy practices." Despite its voluntary nature and exemptions for qigong (Section 4(c)-(d)), I fear the bill lays the groundwork for regulatory creep that could erode qigong’s accessibility and burden its practitioners, ultimately limiting a low-risk, widely beneficial practice.

H.B. 422 creates a board to oversee Asian Bodywork Therapy (ABT), defined as hands-on practices like shiatsu and tuina (Section 3), with licensure requirements including training, fees, and liability coverage (Section 5). While qigong is explicitly exempt (Section 4(d)), the bill’s establishment of a regulatory framework for TCM-based practices risks future expansion. The board’s broad powers—setting standards, investigating complaints, and enforcing rules (Sections 2, 8)—could evolve to encompass qigong if public or professional pressure reframes it as an ABT variant, given its shared roots in qi and meridians. This ambiguity is heightened by Section 11’s advertising restrictions, which, while not directly applicable, might confuse qigong instructors into self-regulating their language to avoid scrutiny.

The potential impact on accessibility is significant. Qigong thrives as an affordable, community-driven practice, often taught by instructors without formal credentials or insurance. H.B. 422’s voluntary licensure (Section 5) and grandfathering provisions (Section 7) might incentivize a shift toward professionalization, indirectly pressuring qigong practitioners to adopt ABT standards—e.g., costly training or fees (minimum $100 renewal, Section 5(b))—to remain competitive or credible. This could exclude part-time or volunteer teachers, reducing qigong’s availability in settings like senior centers or rural areas where it supports public health without taxpayer cost.

Thank you for your attention. I urge you to protect qigong’s future in the Commonwealth by addressing these concerns in H.B. 422.

Sincerely,

[Your Name]  
National Qigong Association