April 10, 2025

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

RE: Letter of Opposition to SB 261

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

As a qigong practitioner dedicated to advancing qigong—a traditional Chinese practice, writes to express our opposition to Senate Bill No. 261, "An Act regulating alternative healing therapies. "I am deeply concerned that this bill’s broad scope and mandatory licensure requirements threaten to restrict qigong practice and impose unnecessary burdens. The Veterans Administration (VA), the nation’s largest healthcare organization, does not require licensure for qigong practitioners offering similar services.

S.B. 261 explicitly includes qigong within its definition of "alternative healing therapies" as an "energy and somatic healing practice" (Section 227, Chapter 112; Section 99(d), Chapter 13), mandating licensure for anyone practicing it for compensation (Section 228(a)). This classification mischaracterizes qigong, which is classified as Complementary Integrative Health Services by the Department of Veterans Affairs. The National Institutes of Health classifies qigong as Complementary Integrative Medicine. Notably, the VA integrates qigong into its wellness programs for veterans without requiring licensure. If the VA, serving millions with rigorous standards, trusts qigong practitioners without such oversight, Massachusetts’ imposition of licensure seems excessive and unjustified.

The licensure requirements (Section 229(b))—including a course of study, professional references, liability coverage, and fees (minimum $100 renewal, Section 229(c))—are poorly suited to qigong’s diverse, often mentorship-based teaching traditions. This regulatory burden risks reducing access to qigong’s proven benefits—stress reduction, improved mobility, and chronic illness support—particularly for low-income or rural residents who depend on its affordability, as well as veterans who benefit from it through VA programs.

Furthermore, S.B. 261 endangers qigong’s cultural heritage. Rooted in Chinese medicine and philosophy, qigong is often taught by community leaders or lineage holders, not clinical professionals. It is important to note that qigong’s origins share deep and historical roots with yoga, and yoga is not listed in this bill. The bill’s Western-style credentialing (Section 233) and board composition (Section 98, Chapter 13)—lacking guaranteed qigong expertise—discount these traditions. The VA’s acceptance of unlicensed qigong instructors underscores that such regulation is not essential for safety or efficacy, highlighting the bill’s overreach.

Thank you for your consideration. We respectfully request that you protect qigong’s vitality and accessibility in the Commonwealth by revising S.B. 261 accordingly.

Sincerely,

[Member’s Name]  
National Qigong Association