



January 28, 2026

Representative Matthew Birong, Chair
House Committee on Government Operations and Military Affairs
115 State Street
Montpelier, VT

RE: H 623; Licensure of Massage Therapists and Massage Establishments

Dear Chair Birong and Members of the House Committee:

The Federation of State Massage Therapy Boards (FSMTB®) is writing in support of H 623 which would create statewide licensure for massage therapists in Vermont.

FSMTB is a not-for-profit with membership comprised of 47 massage therapy regulatory boards and agencies in the United States and its territories. The mission of FSMTB is to support its member boards/agencies in their work to ensure that the practice of massage therapy is provided to the public safely and competently.

Currently, 45 states, and the territories of Washington, D.C., Puerto Rico, and the U.S. Virgin Islands, require massage therapy licensure. Full licensure provides stronger **public protection benefits** than registration alone, as it provides for minimum education and training standards, criminal background checks, an assessment examination to determine entry level competence, and standards of professional conduct. **These licensure requirements help to ensure that the massage therapist is safe and competent to practice.** Licensure also benefits therapists by granting legal authority to practice, defines a scope of practice, and enhanced mobility for therapists across jurisdictions. It helps protect consumers with title protection in that only those licensed are legally able to use the term “massage therapist,” or “massage therapy.” This indirectly benefits law enforcement assistance in detecting unlicensed practitioners and illicit massage businesses.

The need for professional licensure **to protect the public is most necessary when there exists a significant asymmetry of knowledge between the consumer and practitioner**, as in the health care professions of massage therapy. The typical consumer is likely not informed about the appropriate standards for proper intake and assessment, draping, appropriate boundaries, and potential contraindications in the massage therapy arena. Moreover, massage therapy is typically conducted in a private room, dimly lit, with the client in a vulnerable state of undress. Sexual assault and misconduct allegations both by and against the client are a source of complaints and discipline.

One benefit of a licensure framework is access to the administrative enforcement system that expands the ability of those harmed by unprofessional conduct to seek accountability of the practitioner (without recourse to the civil or criminal system) while simultaneously protecting the public. **An administrative system provides a consumer access to justice**, an opportunity for a client who has been harmed to file a complaint and at least be heard. When adverse action is taken, such action protects the public by deterring future conduct, imposing remediation (practice supervision, continuing education, or a fine), or by removing the licensee’s ability to practice, either temporarily or permanently.

Massage therapy has unfortunately been hijacked by illicit massage business (IMBs). Illicit massage businesses are one of primary sources of sex and human trafficking according to the Human Trafficking

Hotline ([National | National Human Trafficking Hotline](#)) and The Network ([Research – The Network](#)). These IMBs cloak their criminal enterprises by utilizing the legitimacy of the massage therapy profession. Establishment licensing is one more tool (beyond just consumer complaints) that massage regulators and law enforcement can utilize to identify and mitigate unlicensed practice, IMBs, and human trafficking (noting that consumers of “services” at IMBs are unlikely to file a consumer complaint!) In addition, **the massage establishment licensure framework created by H 623 creates an additional layer of public protection with minimum health, hygiene, and safety standards** with which the establishment owner/manager must also comply, promoting the health, safety, and welfare of the consuming public.

FSMTB supports advancing the current registration framework to statewide massage therapy and massage establishment licensure by H 623. However, should the legislature choose not to create statewide licensure, then the registration framework for massage establishments under H 588 is better than no establishment regulation.

Please consider FSMTB a reliable and credible source of information, comparative data, and best practices regarding the regulation of the massage therapy profession. Should you have any questions about the FSMTB or any of the above information, please feel free to contact the undersigned. Thank you for the opportunity to bring this information to you.

Sincerely,

A handwritten signature in blue ink that reads "Mai Lin Petrine". The signature is fluid and cursive, with the first name "Mai" and last name "Petrine" clearly distinguishable.

Mai Lin Petrine, JD
Director of Legal and Regulatory Affairs
mlpetrine@fsmtd.org