



Board of Physicians

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Acting Secretary

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2023 SESSION POSITION PAPER

BILL NO.: SB 232 – Health Occupations – Licensed Athletic Trainers – Dry Needling Approval
COMMITTEE: Finance
POSITION: Letter of Information

TITLE: Health Occupations – Licensed Athletic Trainers – Dry Needling Approval

POSITION & RATIONALE:

The Maryland Board of Physicians (the Board) is submitting this Letter of Information for Senate Bill (SB) 232 – Health Occupations – Licensed Athletic Trainers – Dry Needling Approval. If passed, SB 232 would add dry needling to the scope of practice for licensed athletic trainers as a specialized task and establish training and education requirements. The Board does not take positions on scope of practice matters except as they impact the licensing and oversight of its licensees. However, the Board would appreciate clarification regarding some of the training and assessment requirements proposed under SB 232.

According to the proposed H.O. § 14-5D-11.4(b)(3), at least 40 hours of the required training for licensed athletic trainers must be practical, hands-on instruction under the supervision of a licensed health care practitioner who has completed all coursework established in § 14-5D-11.4 and who has practiced dry needling for at least 5 years. As the Board will be tasked with verifying these training requirements, the Board would appreciate clarification regarding what practitioners are qualified to perform this training, and if the 5-year minimum is specific to practice in Maryland. Additionally, the Board would like to inform the Committee that “supervision” is currently defined in H.O. § 14-5D-01(o) as the responsibility of a physician to provide ongoing and immediately available instruction to an athletic trainer.

The Board also has questions regarding the assessment required under the proposed H.O. § 14-5D-11.4(b)(4), which states that the instruction required under § 14-5D-11.4 shall include an assessment of the licensed athletic trainer’s competency to perform dry needling. The Board would like clarification regarding who is assessing the licensed athletic trainer’s competency and how that assessment is documented. This information will be essential to the Board as it develops an approval process for specialized task requests that include dry needling.

Finally, under H.O. § 14-504, a physician with at least 200 hours of training may register to perform acupuncture. The Board requests clarification regarding whether a physician who is registered to perform acupuncture is qualified under SB 232 to train a licensed athletic trainer for dry needling, or if they require an additional 80 hours of training specific to dry needling.

Thank you for your consideration. For more information, please contact Matthew Dudzic, Manager of Policy and Legislation, Maryland Board of Physicians, 410-764-5042.

Sincerely,

A handwritten signature in blue ink, appearing to read "Damean W. E. Freas".

Damean W. E. Freas, D.O.
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.