

Senator Melony Griffith, Chair  
Finance Committee  
3 West, Miller Senate Office Building  
Annapolis, MD 21401



The Maryland  
Acupuncture  
Society, Inc.

February 7, 2023

**Re: SB 232 – UNFAVORABLE – Licensed Athletic Trainers – Dry Needling Registration**

Dear Chairwoman Griffith and Members of the Committee:

Please accept this letter on behalf of the Maryland Acupuncture Society (“MAS”) as our opposition to Senate Bill 232 Licensed Athletic Trainers – Dry Needling Registration. MAS represents over 1,000 licensed practitioners throughout the State of Maryland, and we are in **strong opposition** to this bill.

Senate Bill 232 would give athletic trainers the authority to perform dry needling on patients in Maryland. MAS is strongly opposed to expanding the scope of who is certified to perform dry needling. Dry needling an invasive procedure wherein needles are inserted through the skin into muscle and related tissue. The act of penetrating the skin is potentially dangerous, and without the proper education and training, could result in significant patient injury and harm including a pneumothorax, which is the collapsing of a lung, hemorrhage, nerve damage, and infections, to name just a few. Athletic trainers should not be permitted to perform this invasive procedure because their educational training, which is at a minimum a Bachelor’s Degree, is profoundly insufficient. Their coursework does not include instruction specific to the musculoskeletal and neuromuscular systems.

Licensed acupuncturists are highly trained, skilled providers in the use of filiform needles. According to the National Certification Commission of Acupuncture and Oriental Medicine (NCCAOM), the minimum training to be certified is a 3 year Master's degree program of 105 credits, with many acupuncturists opting for a more extensive Doctorate education. In addition to a minimum required 660 supervised clinical hours in the use of needles, licensed acupuncturists are required to have a minimum of 450 hours of biomedicine. The NCCAOM also administers an exam prior to certification. This is in comparison to the proposed 40 hours of supervised needling proposed in this legislation, with no training standards, requirement of certification, or continuing education.

MAS is very concerned that expanding the scope for athletic trainers to perform dry needling without the requisite level education will put patients’ safety at risk and not uphold Maryland’s highest standards of care. For these reasons, we **STRONGLY OPPOSE** SB 232. Thank you for your consideration of this important piece of legislation.

Sincerely,

Denise Tyson  
President  
Maryland Acupuncture Society