



7750 Montpelier Road
Laurel, Maryland 20723
www.muih.edu
410-888-9048

Delegate Joseline A. Pena-Melnyk, Chair
Health and Government Operations Committee
Room 241 House Office Building
Annapolis, Maryland 21401

13 February 2023

Re: HB 172 – UNFAVORABLE – Health Occupations – Licensed Athletic Trainers – Dry Needling Registration

Dear Chairwoman Pena-Melnyk and Members of the Committee:

As a licensed acupuncturist in Maryland, I have received education in Biomedicine and Eastern Medicine and have taught, researched, and practiced both branches for more than 30 years. I hold a PhD of Anatomy and Neuroscience, am a Doctor of Chinese Medicine (CMD) and hold an international certificate and a board diploma from the National Certification Commission of Acupuncture and Oriental Medicine (NCCAOM). I strongly recommend that to ensure public safety, dry needling should be practiced by practitioners who have met the standards required for licensed acupuncturists and physicians. The reasons are addressed below.

I published an article, *Dry Needling is One Type of Acupuncture*, in the Medical Acupuncture journal by the American Academy of Medical Acupuncture in 2016. In the article, I have addressed why dry needling is one type of acupuncture historically and answered the question scientifically after exploring the similarities and differences between dry needling and acupuncture from the four features: (1) needles used; (2) target points; (3) action mechanisms; and 4) therapeutic effects.

It was observed that both dry needling and acupuncture shared needles, target points, action mechanisms, and therapeutic effects and could be used to treat the musculoskeletal disease effectively. However, because of a lack of adequate training and good regulation, acupuncturists question the safety of dry needling.

The conclusion of the study is that dry needling is one type of acupuncture when acupuncture needles are used. Collaboration and integration should be strengthened between dry-needling

practitioners who are not physicians and acupuncturists and acupuncture-licensed physicians and acupuncturists so that the patients can receive safe and high-quality acupuncture treatments. Five suggestions were proposed for solutions to solve the conflict and debate between dry needling and acupuncture.

With regard to public safety, in general, both dry needling and acupuncture are safe. There are a few reports of adverse events from dry needling and acupuncture. But some cases of life-threatening accidents were reported. Please see the 6 examples from references 42-47 of my article, *Dry Needling is One Type of Acupuncture*. Among them are dry needling treatments that were referred to as acupuncture, because of the media not being aware of the differences between dry needling and acupuncture. As physicians, we are well-trained in needling procedures and clinical management, safety is not considered to be a problem. Physical therapists, athletic trainers and other allied professionals who are not physicians or acupuncturists might lack the necessary training to do dry needling. In contrast, licensed acupuncturists have received a minimum of 1905 hours of education (660 hours of hands-on supervised clinical training and 1245 hours of didactic instruction), while some physical therapists and other allied health professionals have had only a fraction of this training, therefore limiting training in needling techniques and safety.

To guarantee safety in the dry needling technique, the American Medical Association (AMA) has adopted a new policy on dry needling that says PTs and other nonphysicians practicing dry needling should—at a minimum—have standards that are similar to the ones for training, certification and continuing education that exist for acupuncture. **The AMA stated: “Lax regulation and nonexistent standards surround this invasive practice. For patients’ safety, practitioners should meet standards required for licensed acupuncturists and physicians.”**

The American Academy of Medical Acupuncture (AAMA) also made a similar policy: The AAMA recognizes dry needling as an invasive procedure using acupuncture needles that have associated medical risks. Therefore, the AAMA maintains that **this procedure should be performed only by practitioners with extensive training and familiarity with the routine use of needles in their practice and who are duly licensed to perform these procedures, such as licensed medical physicians or licensed acupuncturists.**

Because of a time conflict with teaching at Maryland University of Integrative Health, I am not able to attend the hearing. I would like to invite the President of Maryland Acupuncture Society, Dr. Denise Tyson, to present this letter to you.

Thank you for your consideration. Let me know if you have any questions.

Sincerely,

Heming Zhu, Ph.D., CMD, MD (China), M.Ac., Dipl.OM. (NCCAOM)

Professor of Integrative Health and Sciences, Acupuncture and Herbal Medicine,
Maryland University of Integrative Health, Laurel, MD.
Founder and Director of Harmony Acupuncture and Chinese Medicine

As an acupuncture community, we look forward to collaborating with non-acupuncture-licensed – dry needling practitioners to increase training requirements, as the AMA and AAMA requested. An important question remains: Are they willing to be regulated for public safety?

Dr. Sharon Jennings-Rojas, DOM, M.Ac., L.Ac., RT (NADA)

Department Chair of Acupuncture and Herbal Medicine
Maryland University of Integrative Health, Laurel, MD.
Founder of Chakramoon, Inc.

Janet Padgett, Ph.D., M.Ac., Dipl.Ac. (NCCAOM)

Director of Acupuncture Programs, Department of Acupuncture and Herbal Medicine
Maryland University of Integrative Health, Laurel, MD.

References

1. Zhu H, Most H. (2016). Dry needling is one type of acupuncture. *Medical Acupuncture*. 28(4):184–193.
2. Zhu H and Most H. (2016). Response to Dommerholt and Stanborough re: “Dry Needling Is One Type of Acupuncture”. 28(5):288-289.
3. American Medical Association (AMA). (June 15, 2016). AMA Adopts New Policies on Final Day Of Annual Meeting. Posted Online document at: www.ama-assn.org/ama/pub/news/news/2016/2016-06-15-new-policies-annual-meeting.page.
4. National Certification Commission for Acupuncture and Oriental Medicine. (September 5, 2016). AAMA Policy on Dry Needling. Online document at: www.nccaom.org/aama-policy-on-dry-needling/ Accessed.