



February 6, 2023

RE: Concerns Regarding the Practice of Dry Needling by Allied Health Professionals

The National Certification Commission for Acupuncture (NCCAOM®) is writing to express serious concerns about the practice of dry needling by practitioners with little to no specified training, education or assessment in Maryland. As the only certification organization in the U.S. with nationally accredited certification programs in acupuncture and herbal medicine, the NCCAOM has serious concerns regarding any regulation that allows practitioners who do not have the proper didactic and clinical training AND assessment to practice any form of acupuncture, including dry needling. We believe that any practitioner who has not completed an accredited educational program or passed an exam accredited by a national accredited body, such as the National Commission for Certifying Agencies (NCCA), fails to meet the necessary educational and training requirements needed for the safe and effective delivery of any form of acupuncture therapy.

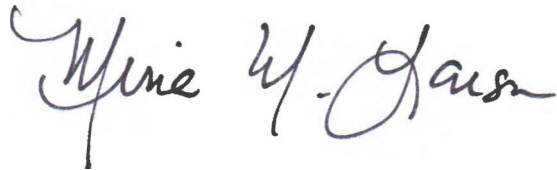
The mission of the NCCAOM is to assure the safety and well-being of the public and to advance and advocate for the professional practice of NCCAOM Board-Certified Acupuncturists™ by promoting established national standards focused on competence and credential. NCCAOM National Board-Certified Acupuncturists have practiced and documented “dry needling”, for decades in the U.S. “Dry needling” is considered an advanced acupuncture technique because of its potential to do localized damage to the muscle tissue at the trigger point (acupuncture point) location, as well as the possibility of organ damage, such as pneumothorax. In the hands of a practitioner who has received limited and/or substandard training, the likelihood of an adverse event is significantly higher. Dry needling can be considered safe only when performed by properly trained and experienced acupuncturists. NCCAOM National Board-Certified Acupuncturists™ receive hundreds of hours in the core skills required to correctly perform invasive and potentially dangerous needling techniques, assuring their competencies to insert and manipulate acupuncture needles safely.

The majority of states, to include Maryland, require acupuncturists who practice acupuncture to meet recognized standards of competence and safety through a rigorous process including completing education from a school accredited by the Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM), passing of the NCCAOM examinations, and achieving NCCAOM certification.

The practice of dry needling is more than merely placing needles at various points for different conditions. In fact, any new rule based on this lack of standards would directly contradict the licensing requirements that already exist in many states regulating the practice of acupuncture.

I hope you will find this information valuable. Please also refer to the [NCCAOM Dry Needling Position Statement](#) for additional information and consider the NCCAOM as a resource for current information about the standards of competence and practice within the field of acupuncture and herbal medicine. Please feel free to contact me by phone (703-314-2908) or by email (mlarson@thenccaom.org) if I can offer further information on this topic.

Sincerely,

A handwritten signature in black ink that reads "Mina M. Larson". The signature is written in a cursive, flowing style.

Mina M. Larson, M.S., MBA, CAE
NCCAOM Chief Executive Officer