

Delegate Joseline A. Pena-Melnyk, Chair
Health and Government Operations Committee
Room 241 House Office Building
Annapolis, Maryland 21401
February 13, 2023



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

Dear Chairwoman Pena-Melnyk and Members of the Committee:

I am contacting you as a concerned licensed acupuncturists and on behalf of acupuncture patients across the United States regarding Maryland SB 232 allowing athletic trainers to provide dry needling, and to express my strong opposition. Should this bill pass, and allow athletic trainers to use the appropriated technique described as dry needling, Maryland patients are at risk of grave harm including punctured lungs, infection, nerve damage, and more.

I am a clinical cancer researcher and am highly critical of safety practices in any clinical setting. Over the six years learning acupuncture in didactic (over 4,000 hours) and clinical (over 1,500 hours) settings, the necessity for extensive hands-on training in near-sterile technique, appropriate identification and use of needle gauge, depth, and vector, as well as situational awareness that only comes with practice became very clear. I assert that any medical and allied health profession should be challenged to receive training to the highest degree reasonable when incorporating novel therapeutics. The proposed postgraduate training in the use of filiform needles by athletic trainers is both *insufficient* and *inappropriate*.

Multiple medical boards, professional organizations, and certifying bodies, including CMS, AMA, AAMA, AAPMR have concluded that not only is dry needling the practice of acupuncture, but that its practice should be limited to providers with extensive training in the use of filiform needles such as trained physicians and licensed acupuncturists going back to 2012.

The use of filiform needles for medical purposes is part of a larger system of traditional medicine that has long faced disparagement from the medical community at large and must be practiced with the proper context and training. Acupuncture practice involves an distinct system of examination, diagnosis, and treatment that comprehensively informs licensed acupuncturists of appropriate needle prescription. It is not enough to know simple anatomy, but knowledge of the larger systemic effects of using needles is necessary for public safety. Not just to avoid physical harm, but also the financial harm of ineffective treatment at best, and additional treatment needed to combat adverse effects at worst.

Physicians require 300 hours of additional training to perform acupuncture, and athletic trainers are requesting to be approved with an 80-hour course. Athletic trainers are seeking to expand their scope to include an invasive procedure which they have no training for, without going through the necessary process of a change to their statute. Furthermore, the Medical Board has already testified that they have no mechanism in place to perform the required supervision of athletic trainers in Maryland.

For all these reasons, I am asking you to oppose HB172.

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