



Delegate Joseline Pena-Melnyk, Chair  
Room 241  
House Office Building  
Annapolis, Maryland 21401

February 13, 2023

**Re: HB0172 – UNFAVORABLE – Health Occupations – Licensed Athletic Trainers – Dry Needling Approval**

Dear Chairwoman Pena-Melnyk and Members of the Committee:

The Minnesota Acupuncture Association is contacting you regarding Maryland SB 232 allowing athletic trainers to provide dry needling, and to express our strong opposition,

Dry needling outside of any standardized nationally certified educational program is a potential risk to patient safety and the practice is currently void of any nationally standardized education, licensure and oversight.

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 American Academy of Physical Medicine and Rehabilitation (AAPMR) issued the following in 2012: "The American Academy of Physical Medicine and Rehabilitation recognizes dry needling as an invasive procedure using acupuncture needles that has associated medical risks. Therefore, the AAPMR maintains that this procedure should only be performed by practitioners with standard training and familiarity with routine use of needles in their practice, such as licensed acupuncturists or licensed medical physicians."
- 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. 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 80 hours of supervised needling proposed in this legislation, with no training standards, requirement of certification, or continuing education.

- As noted from the Maryland Board of Physicians Athletic Trainer Advisory Committee meeting notes from Tuesday, January 12, 2021, “Health Occ. §14-5D-1(m)(3) states that the practice of athletic training does not include the practice of physical therapy, and if dry needling falls within the scope of practice of physical therapy than it cannot be included in the scope of practice of athletic training.” Ms. Darin, esq. also noted “adding dry needling to the scope of practice would require a change to the statute.”

Physicians require 300 hours of additional training in order to perform acupuncture, and athletic trainers are requesting to be approved with an 80-hour course. Athletic trainers are also 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 the state of Maryland.

For all these reasons, the Minnesota Acupuncture Association is asking you to oppose HB172.

Respectfully,

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