

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:

As both an acupuncturist and an Olympic athlete, I have seen the benefits of dry needling and acupuncture firsthand. While athletic trainers may be trained in the technique of dry needling, they lack the extensive knowledge and expertise in the principles of Traditional Chinese Medicine and anatomy that acupuncturists possess. This knowledge is essential for the safe and effective use of these therapies. Acupuncture and dry needling should only be performed by licensed acupuncturists who have received thorough training in anatomy, physiology, and the principles of Traditional Chinese Medicine to ensure the best possible outcomes for their patients.

Acupuncture and dry needling are two related but distinct therapeutic techniques that can be used to treat pain and other conditions. While both techniques involve the insertion of thin needles into the skin, there are several key differences between acupuncture and dry needling.

Acupuncture is based on the principles of Traditional Chinese Medicine (TCM) and aims to balance the flow of energy (known as Qi) throughout the body. Acupuncture points are chosen based on a patient's specific health condition and symptoms, with the goal of restoring balance to the body and promoting healing. In contrast, dry needling is primarily focused on the treatment of pain and trigger points (located near or at acupuncture points) and does not necessarily take into account the broader holistic approach of TCM.

In terms of efficacy, acupuncture has been shown via meta analysis (source below) to be effective in the treatment of various conditions, including pain, musculoskeletal disorders, and digestive problems. While in a meta analysis Dry Needling has not been shown the same long term and short term benefits (source below). The effectiveness of each technique may vary depending on the specific condition being treated and the individual patient.

In general, acupuncture is considered a holistic therapy that aims to address the underlying causes of a patient's symptoms and promote overall health and well-being,

while dry needling is considered a more targeted and symptomatic approach to pain management.

Acupuncturists undergo rigorous education to ensure that they are equipped with the knowledge and skills necessary to provide safe and effective care to their patients. Acupuncture is a complex therapy that requires a deep understanding of anatomy, physiology, and the principles of Traditional Chinese Medicine. This includes knowledge of the location of acupuncture points, the functions and interactions of the various organs and systems of the body, and the appropriate use of needles and other modalities.

In addition to this extensive knowledge base, acupuncturists also undergo hands-on training in the safe and effective use of needles and other techniques. This training helps them to develop the manual dexterity and technical skills necessary to perform acupuncture with precision and confidence.

The rigorous education and training that acupuncturists receive is critical to ensuring that they are able to provide high-quality care that is both safe and effective. This rigorous education helps to ensure that patients receive the best possible outcomes from their acupuncture treatments.

Expanding the scope of athletic trainers to include practices such as dry needling and acupuncture could lead to more issues and patient harm in the future for several reasons:

1. Lack of proper training: Athletic trainers may not have the same level of education and training in anatomy, physiology, and the principles of Traditional Chinese Medicine as licensed acupuncturists, which could result in improper needle placement and potential harm to the patient.
2. Safety concerns: Acupuncture and dry needling are invasive procedures that carry a small risk of adverse events, such as bleeding, infection, and nerve damage, and collapsed lung. Athletic trainers may not be fully equipped to handle these types of complications and may not have the necessary knowledge and skills to properly manage them.
3. Limitations in diagnosis: Athletic trainers may not have the same level of expertise in diagnosing underlying health conditions as licensed acupuncturists, which could result in improper treatment or missed diagnoses.

4. Legal and ethical considerations: Expanding the scope of athletic trainers to include practices such as acupuncture and dry needling could raise legal and ethical questions regarding the scope of their practice and the standard of care that they are expected to provide.

In summary, expanding the scope of athletic trainers to include practices such as acupuncture and dry needling without proper education, training, and oversight could result in increased risks to patient safety and harm, and may raise ethical and legal concerns. It is important that these practices continue to be performed by licensed and trained practitioners of TCM, with the necessary knowledge and skills to ensure safe and effective treatment.

Sincerely,

Aaron Adams, MAOM  
Coordinator, Human Performance Lab  
Professor, Anatomy & Kinesiology  
Louisiana State University- Shreveport  
Graduate: Maryland University of Integrative Health (MUIH)  
Maryland Licensed Acupuncturist  
PMID: 28158962  
PMID: 27471137