

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:

I am contacting you as a Maryland constituent regarding Maryland HB0172 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.

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 it's 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 entirely separate system of examination, diagnosis, and treatment that informs licensed acupuncturists not only where to place the needles but provides the why and when. 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.

According to American Medical Association (AMA) policy H-410.949 from 2016, "Our AMA recognizes dry needling as an invasive procedure and maintains that dry needling should only be performed by practitioners with standard training and familiarity with routine use of needles in their practice, such as licensed medical physicians and licensed acupuncturists."

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, I am asking you to oppose HB172.

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