



Dr. Christopher Dye, D.Ac., L.Ac., Dip.Ac. (NCCAOM)

41 Union Square West, Suite 511, New York, NY 10003

Phone: 917-214-1272 Website: www.ManhattanClassicalAcupuncture.com

Email: ClassicalAcupuncture@gmail.com

Delegate Josephine Pena-Melnyk,
Chair Room 241
House Office Building
Annapolis, MD 21401

February 13, 2023

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

Dear Chairwoman Pena-Malnyk and Members of the Committee:

I am a doctor of acupuncture, nationally board-certified and state licensed, all of which are important standards of training and oversight in my medicine to assure the necessary quality of care to my patients. I am writing on behalf of patients of acupuncture in Maryland to Strongly Oppose HB0172 as it is absolutely not in the best interests and safety of the people of Maryland.

Allowing athletic trainers to use the appropriated technique known as dry needling with only 80 hours of total training, 40 hours supervised with no training standards, requirement of certification, or continuing education puts patients at serious risk of punctured lungs, infection, nerve damage and more.

Multiple medical boards, professional organizations, and certifying bodies, including the CMS, AMA, AAMA, and AAPMR have concluded that that dry needling is acupuncture and that it should be limited to medical providers with extensive training in the use of filiform needles such as trained physicians and licensed acupuncturists. The standards for training acupuncturists are far, far higher, with the National Certification Commission of Acupuncture and Oriental Medicine (NCCAOM) requiring as a minimum training a 3-year Masters program including a minimum 450 hours of biomedicine and 660 hours of supervised clinical hours, with the NCCAOM administering an exam for certification and requiring 60 hours continuing education every 4 years. This is again in contrast to the 40 hours supervised training with no training standards or exam or continuing education with HB0172.

This bill so grossly underestimates the training needed for acupuncture dry needling that it puts the public at risk. In my professional opinion and given my 19 years of clinical experience, I strongly advise against HB0172.

Sincerely,

Dr. Christopher Dye, D.Ac, L.Ac