

Dear Chairwoman Pena-Melnyk and Members of the committee,

I am contacting you as a Licensed acupuncturist, and the President of the Acupuncture Society of New York. I am in opposition of HB0172 for the following reasons:

It doesn't make sense that the acupuncture profession has had to prove itself through rigid national standards, advanced training, and massive amounts of research to become experts, only to say it's safe for other professions with weekend courses to appropriate these techniques. Why would the bare minimum for my profession to pick up needles and perform invasive procedures require a minimum of a 3-year Master's degree, but other fields remove the theory, have no explicit ability in their scope to perform invasive techniques, and perform the same methods with only 80 hours of training, no exams, no oversight and no continuing education? None of this has patient safety in mind. Medical doctors, whose education of far more extensive than athletic trainers, are required to complete 300 hours of training, 100 of which must be clinical, they must also pass a third party exam, and are required to have continuing education in order to practice.

The lack of proper training and continuing education for athletic trainers and physical therapists in the practice of dry needling raises concerns about the potential harm they may be causing, rather than providing relief and healing, especially when compared to acupuncturists who are already well-qualified. Licensed acupuncturists are trained in programs that must be accredited by an agency that is answerable to the US Department of Education, which have to meet the highest standards of education and undergo regular and extensive site visits to ensure adequate education and safety measures. Working with each other, Traditional Asian Medicine practitioners can help Athletic Trainers develop curriculums for acupuncture delivery that could offer ground-breaking long-term treatment plans that can return athletes to the field, whole, or can help with all facets of recovery, if unable to return to the field.

Thank you for your consideration,

Dr. Beth Nugent DACM, LAc, Dipl. O.M.

Doctor of Acupuncture and Chinese Medicine