



Maryland Board of Acupuncture
4201 Patterson Avenue, Suite 301
Baltimore, MD 21215

Maryland Board of Chiropractic Examiners
4201 Patterson Avenue,
Baltimore, Maryland 21215

Maryland Board of Physical Therapy Examiners
4201 Patterson Avenue,
Baltimore, Maryland 21215

**2023 SESSION
POSITION PAPER**

BILL NO: SB 232
COMMITTEE: HGO
POSITION: OPPOSE

TITLE: Health Occupations - Licensed Athletic Trainers - Dry Needling Approval

BILL ANALYSIS: This Bill expands the practice scope for athletic trainers to perform dry needling and creates registration with the Board of Physicians for athletic trainers performing dry needling who have completed dry needling training requirements of 80 hours.

POSITION AND RATIONALE: The Maryland Board of Acupuncture (the “Board”), the Maryland Board of Chiropractic Examiners, and the Maryland Board of Physical Therapy Examiners, strongly opposes SB 232.

Dry Needling is an intramuscular manual therapy that involves the insertion of one or more solid (filiform) needles into the muscle and related tissues to affect change in muscle and related tissues. The Board believes that Athletic Trainers (ATs), whose minimum required education is a bachelor’s degree, do not have sufficient education to perform dry needling with only 80 additional hours of additional training exclusively pertaining to dry needling.

Education for Athletic Trainers is Significantly Less than Acupuncturists, Physical Therapists and Chiropractors

The act of piercing the skin and contacting the internal terrain of the body can be damaging and dangerous to the health and well-being of a patient. This Bill creates registration requirements for ATs to complete 80 hours of training to register to perform dry needling. ATs have significantly less education and training than Acupuncturists, Physical Therapists, or Chiropractors. In Maryland, Acupuncturists must have a master’s degree. Approximately 96% of Physical Therapists and 100% of Chiropractors are trained at the doctoral level.

Acupuncturists, for example, are required to devote hundreds of hours to needle technique, infection control, and safe handling of needles, as well as biomedical factors, and hands-on

clinical training. Physical Therapists must include extensive instruction in anatomy, histology, physiology, biomechanics, kinesiology, neuroscience, pharmacology, pathology, clinical sciences, clinical interventions, clinical application, and screening. The basic anatomical, physiological, and biomechanical knowledge necessary for the safe and competent provision of dry needling is taught as part of the core education for Physical Therapists; specific dry needling skills are supplemental to that significant core knowledge. ATs' education and examinations lack in-depth training about the body and about invasive procedures that would be necessary for dry needling.

Miscellaneous Concerns

The opposing coalition recognizes that amendments to the House version of this Bill (HB 172) clarify that dry needling does not include "mechanical devices" aside from needles. That modification removing "any mechanical devices" has not been removed from this Senate version and expands the definition of dry needling beyond the practice by Physical Therapists or Chiropractors.

Summary of Concerns

In summation, dry needling is a therapeutic technique that has achieved positive patient outcomes because it has been administered by academically and clinically prepared practitioners. If administered by an ill-prepared practitioner, dry needling becomes a dangerous procedure that risks the health and safety of Marylanders. ATs lack the necessary underlying academic education to safely perform the invasive procedure of dry needling with the addition of a mere 80 hours of training. Finally, with over 1200 acupuncturists, as well as more than 900 Physical Therapists and chiropractors, there currently exists a sufficient number of well trained professionals that can perform dry needling for all Marylanders. For a more detailed written testimony, please refer to the Boards' letter of opposition submitted for the Senate Finance hearing on February 7, 2023, as well as the House HGO Committee on February 15, 2023.

For all of these reasons, the State Board of Acupuncture, the State Board of Chiropractic Examiners and the State Board of Physical Therapy Examiners, continues to oppose this bill and respectfully urges, for the safety of the public, that the Committee vote unfavorably on SB 232.

Thank you for your consideration. For more information, please contact Tiffany Smith-Williams, Executive Director for the Acupuncture Board, at 410-764-5925 or tiffany.smith-williams@maryland.gov or Lillian Reese, the legislative liaison for the boards at 443-794-4757 or at lillian.reese@maryland.gov.

The opinion of the Boards expressed in this document does not necessarily reflect that of the Department of Health or the Administration.