



February 4, 2026

Chair Heather Bagnall
Maryland House Health Committee
240 Taylor House Office Building,
Annapolis, MD 21401

Re: Support for SB0370 – Acupuncture Practice Act Revisions

Dear Honorable Bagnall and Members of the House Health Committee,

I am writing to express my support for SB0370, which makes important updates to the statutes governing the practice of acupuncture in Maryland. I appreciate the bill’s intent to strengthen public protection and professional accountability; however, I respectfully recommend that the Committee clarify language related to certification and examination requirements to ensure alignment with current national standards.

Clarification Needed on Certification and Examination Language

Section 1A–302(b) of the bill references “a passing score on an examination,” but this wording can be misleading. National board certification administered by the National Certification Board for Acupuncture and Herbal Medicine (NCBAHM) - formerly, NCCAOM - is not a single exam. Board Certification requires passing multiple, distinct exam modules, each of which assesses separate core competencies essential to safe practice.

Using the singular term “exam” throughout the bill may unintentionally imply that certification requirements can be satisfied through only one exam. In actuality, NCBAHM Certification for Acupuncture requires successful completion of three separate exam modules:

1. ACPL – Acupuncture with Point Location
Establishes competence in needle technique, point location accuracy, and foundational acupuncture skills.
2. FOM – Foundations of Oriental Medicine
Evaluates understanding of diagnostic theory, pattern differentiation, and classical East Asian medical principles—critical for accurate and safe patient assessment.
3. BIO – Biomedicine
Ensures acupuncturists have appropriate biomedical knowledge, including red flag conditions, contraindications, safety precautions, and referral guidelines.

These modules collectively establish the nationally recognized minimum standards for safe, entry-level acupuncture practice under current NCBAHM certification standards administered



by NCBAHM. Certification is awarded only after successful completion of all required examination modules, each addressing distinct and essential areas of practitioner competency.

To prevent ambiguity and maintain high standards of public safety, I recommend that HB0374 explicitly state that:

- Applicants must achieve passing scores on all required NCBAHM exam modules (not one single exam).
- The term “examination” be replaced with “required certification examinations” or otherwise clarified to reflect the multi-exam structure.-exam structure.
- Reference to the National Certification Board for Acupuncture and Herbal Medicine (NCBAHM) be updated consistently throughout the statute to reflect the current national certifying body.

Accurate statutory language ensures that Maryland’s licensed acupuncturists have demonstrated competence in all areas required for safe practice. The ACPL, FOM, and BIO exams each address uniquely critical safety domains. Maintaining clear statutory language is important to ensure that certification requirements are fully understood and applied, supporting patient safety in areas such as diagnosis, needling technique, and identification of biomedical red-flag conditions.

SB0370 is a strong step toward modernizing the practice act. Ensuring that the certification language fully aligns with current national standards will strengthen the bill and reinforce Maryland’s commitment to patient safety and practitioner competence.

Thank you for your consideration and for your work in advancing high-quality healthcare policy in Maryland. I respectfully urge a favorable report on SB0370 with the recommended clarifying amendments.

NCBAHM stands ready to assist the State of Maryland as it considers these proposed rule adjustments. Thank you for your thoughtful consideration and for your continued commitment to protecting public health while ensuring access to safe, qualified acupuncture care. Please feel free to contact me at (703-314-2908) or mlarson@ncbahm.org should you require any further information.

Sincerely,

Mina M. Larson, M.S., MBA, CAE

Chief Executive Officer



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FOR ACUPUNCTURE & HERBAL MEDICINE