

February 6, 2026

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

**Re:** Support for HB0374 – Acupuncture Practice Act Revisions

Dear Honorable Bagnall and Members of the House Health Committee,

On behalf of the American Society of Acupuncturists (ASA), which is the largest acupuncture professional trade association in the US, I write to express our support for SB0370, which makes important updates to the statutes governing the practice of acupuncture in Maryland. We appreciate HB0374 intent to strengthen public protection and professional accountability. We urge the Committee to 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, and does not clarify which exam from which source. 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 practicing safely as well as the ability not to harm.

Using the singular term “exam” without further clarification throughout the bill may unintentionally imply that Certification requirements can be satisfied through one exam. 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 standard for safe, entry-level acupuncture practice under current NCBAHM certification standards. 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, the American Society of Acupuncturists recommends that SB0370 explicitly state that:

- Applicants must achieve passing scores on all required NCBAHM exam modules (not just one exam).
- The term examination be replaced with “required certification examinations” or otherwise distinctly clarified to reflect the multi-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 of these 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 acupuncture 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 provider competence.

Thank you for your consideration and for your work in advancing high-quality healthcare policy and best practices in Maryland. On behalf of the American Society of Acupuncturists, I respectfully urge a favorable report on HB0374 with the recommended clarifying amendments.

The ASA 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.

Respectfully,

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