



AMERICAN ASSOCIATION of  
ACUPUNCTURE *and* ORIENTAL MEDICINE

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April 16, 2011

Board of Allied Health Professionals  
1000 Washington Street, Suite 710  
Boston, Massachusetts 02118

RE: USE OF 'DRY NEEDLE' ACUPUNCTURE BY PHYSICAL THERAPISTS

Dear Massachusetts Board of Allied Health Professionals:

This letter is submitted on behalf of the American Association of Acupuncture and Oriental Medicine (AAAOM), the national organization representing all acupuncturists in the United States, in opposition to the proposed expansion of the physical therapy scope of practice to include dry needling. The following is a summary of the findings of AAAOM's Task Force charged with investigating this and other attempts by Physical Therapists to add needle injection/acupuncture ('dry needling') into the scope of practice for physical therapists.

The medical literature clearly identifies 'dry needling' as acupuncture. Accordingly; this Task Force can find no authority for Physical Therapists to administer acupuncture, or any type of needle insertion through the skin. It is historically and statutorily clear that "physical therapy interventions" were never intended nor implied to include 'needle insertion,' (whether that needle be 'wet' or 'dry'). There is no accredited school of Physical Therapy that offers an extensive course or clinical training in 'dry needle' technique, much less any complex and extensive didactic or clinical training in acupuncture. The current training programs on Dry Needle Technique for Physical Therapists in the US and in Europe are made up of a one-weekend seminar.

Licensed acupuncturists undertake rigorous credentialing and examination processes - particularly by graduate level educational programs that are programmatically accredited, requiring four to six years to complete (after completing the prerequisite college course work required for matriculation). These training programs typically involve at least two years of clinical rotation, and most colleges award a master's of science degree. The minimum program for acupuncture allowed by the Accreditation Commission of Acupuncture and Oriental Medicine is 1905 hours which includes 660 hours of clinical application. The licensed acupuncturist in the U.S. is a highly trained clinical specialist who provides care based on course work in biomedical sciences in addition to traditional Asian medicine. Even some of the European programs that teach 'dry needle' technique openly admit that it is.

What physical therapists are attempting to do is to include acupuncture in their scope by calling it a different name, thereby circumventing the extensive training required by both Physicians and Acupuncturists to insert needles into patients for the treatment of health issues. Moreover, needles are not merely 'assistive devices,' they are in fact federally-regulated medical devices

that require proof of training and certification in clean needle technique in order to lawfully engage in the practice of acupuncture.

This Task Force has contacted Michael J. Schroeder, the Vice-president and Legal Counsel for Allied Professional Insurance Company (APIC). APIC provides malpractice insurance for Physical Therapists. Mr. Schroeder stated that APS would revoke the malpractice insurance of any Physical Therapist engaged in the use of 'dry needle' technique. He stated that this is because of the "risk of public endangerment created by a Physical Therapist engaging in a medical procedure for which they have no adequate education or training."

It is and has long been a violation of most health care professional codes of conduct throughout the U.S. to engage in, or advertise a service, unless the provider is adequately credentialed and qualified to do so. Therefore the mere advertisement by a PT for 'dry needling' can be reasonably considered unethical misrepresentation and/or misleading to the public. Furthermore, and most potentially detrimental to licensed PTs, is that the performance of 'dry needling' by an unqualified and/or credentialed PT can be offered and reasonably substantiated as proof of negligence in a malpractice claim against said unqualified and/or credentialed PT.

Based upon the above information, this Task Force concludes that if the Board of Allied Health Professionals allows physical therapists with one weekend of training to insert needles into patients, they will create a serious endangerment to the public and set a precarious legal precedent.

Sincerely,



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AAAOM Legal Counsel



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AAAOM President