



AOMSM
Acupuncture and
Oriental Medicine Society
of Massachusetts

April 25, 2011

Board of Registration in Allied Health Professionals
1000 Washington Street, Suite 710
Boston, Massachusetts 02118-6100

Dear James Zachazewski, PT, ATC, Chair:

The Acupuncture and Oriental Medicine Society of Massachusetts (AOMSM) would like to offer the following comments for your consideration in your examination of the question whether dry needling is within the scope of practice of physical therapists in Massachusetts.

It is the position of AOMSM that dry needling is acupuncture¹ and as such is prohibited by Massachusetts law from being performed by physical therapists according to MA General Laws, Part 1, Title XVI, Chapter 112, Section 162 (see below) . Dry needling is an invasive acupuncture treatment based on historical Ashi Point theory², used by 82% of L.Ac.s when treating patients with pain.³ The aim of Ashi Point acupuncture⁴ and trigger point dry needling is to achieve a local twitch response to release muscle tension and pain.⁵ Continuing education courses for physical therapists in “dry needling” base their coursework on clinical acupuncture and acupuncture research, further showing the direct link between “dry needling” and acupuncture.^{6,7}

It is also the position of AOMSM that anyone performing any action which punctures the skin with filiform needles must be licensed in acupuncture by the Board of Registration in Medicine, meeting all educational and board examination requirements.

Please feel free to contact us.

Sincerely,

Hudson Doyle, L.Ac., President
Acupuncture and Oriental Medicine Society of Massachusetts (AOMSM)

MA General Laws/Part I, Title XVI, Chapter 112, Section 162
Section 162. Nothing contained in sections one hundred and forty-nine to one hundred and sixty-two, inclusive, shall prohibit any person employed as an acupuncturist by an agency of the federal government from practicing acupuncture while discharging his official duties as such employee. Nothing contained herein shall prevent physical therapists from practicing transcutaneous nerve stimulation, the stimulation of muscle contractions for the purpose of diagnosis or rehabilitation, or other techniques in the context of standard Western Medical Procedure and neither defined as nor held out to be acupuncture. Nothing contained herein shall prevent licensed physicians from practicing acupuncture.

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- ¹ John Amaro, "The 24 Points Used in Neurological Dry Needling", *Acupuncture Today* 11:11 (November 2010.)
- ² Chinese Acupuncture and Moxibustion (Beijing: Foreign Language Press, 2004) 116.
- ³ National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM) 2008 Job Task Analysis
- ⁴ John Amaro, "When Acupuncture Becomes 'Dry Needling'", *Acupuncture Today* 8:11, (November 2007.)
- ⁵ Kinectacore Physical Therapy Education, *Trigger Point Dry Needling or Intramuscular Manual Therapy*, <http://kinetacore.com/physical-therapy/Trigger-Point-Dry-Needling-or-Intramuscular-Manual-Therapy/page150.html> (accessed 3/2011)
- ⁶ Dry Needling Course, Dr. Ma's: Biomedical Acupuncture for Pain Management, Integrative Approach, Yun-tao Ma, Mila Ma Z. Cho, Elsevier, 2005
- ⁷ Kinectacore Physical Therapy Education, *Level 1 TDN Course Reading and Study Preparation*, <http://kinetacore.com/physical-therapy/Level-1-TDN-Course-Reading-and-Study-Preparation/page47.html> (accessed 3/2011)