



NEW ENGLAND
SCHOOL OF
ACUPUNCTURE

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April 25, 2011

Board of Registration in Allied Health Professionals
James Zachazewski, PT, ATC
Division of Professional Licensure
1000 Washington Street, Suite 710
Boston, Massachusetts 02118-6100

Re: 'Dry Needling' and PT Scope of Practice

Dear Mr. Zachazewski -

I am President of the New England School of Acupuncture ('NESA') and am writing in connection with the Board of Registration Allied Health Professionals' discussion around including 'dry needling' within the scope of practice of a physical therapist. NESA is located in Newton, MA. It is the first school of acupuncture established in the United States; highly regarded for excellence in education; the recipient of research funding from the National Institutes of Health and the Department of Defense; and, a significant contributor to public health, through the delivery of over 20,000 affordable acupuncture treatments a year.

As you know, the Council of Colleges of Acupuncture and Oriental Medicine ('CCAOM') has issued a position paper on this topic stating, "It is the position of the CCAOM that any intervention utilizing dry needling techniques, either on trigger points or any other anatomical locations, is within the scope of acupuncture, regardless of the language utilized in describing the technique."

I want to state my strong support of this position. 'Dry needling' is one of several acupuncture techniques that a licensed acupuncturist may determine is appropriate and apply, independently or in conjunction with other techniques, based on a differential diagnosis. Further, in the interest of public awareness and safety, I want to share with you and your colleagues the rigorous academic and clinical training and testing required for licensure to practice acupuncture in Massachusetts. The criteria set forth on the attached document are evidence of the breadth and depth of knowledge necessary to practice acupuncture safely and effectively.

Letter from NESAs to Board of Registration in Allied Health Professions, James Zachazewski, PT, ATC
April 26, 2011

I have great respect for the training and services of physical therapists and other medical professionals. However, the expansion of scope of practice by one profession to include techniques that require substantially more training within another profession compromises safety and efficacy. Please take this into consideration in your discussions and decisions.

If I can provide further information, I would be happy to do so.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine S. Tallman". The signature is fluid and cursive, with the first name being the most prominent.

Katherine S. Tallman
President

cc: AOMSM Legislative Committee

New England School of Acupuncture Requirements for Admission, Graduation and Licensure in Massachusetts

Admission

- Bachelor's Degree from Accredited Institution
- Demonstrated proficiency in English
- Completion of Human Anatomy & Physiology within the past 10 years
- Completion of at least two of the following science courses (one with lab): Physics, Biology, Chemistry, Organic Chemistry, Microbiology, Psychology, Biochemistry

Masters Degree in Acupuncture (MAc)

- 33 months of education and clinical training (minimum)
- Completion of 1st and 2nd year comprehensive exams, and, if applicable, the Japanese comprehensive exam
- 1,875 hours of didactic training in acupuncture and related topics, biomedical and clinical sciences, counseling, ethics and practice management
- At least 780 hours of point location and needling
- At least 150 hours of clinical observation at three distinct sites
- At least 630 hours of clinical internship
- At least 250 treatments

Masters Degree in Acupuncture and Oriental Medicine (MAOM)

- Completion of the above plus additional 3 months of training
- Additional 277.5 of didactic training, including herbal studies
- Completion of the Chinese Herbal Medicine comprehensive exam
- Additional 30 hours of assistantship
- 15 hours of dispensary assistantship
- Additional 90 hours of clinical internship
- Additional 100 treatments

Licensure to Practice Acupuncture in Massachusetts (Massachusetts Board of Registration in Medicine)

- Undergraduate Degree
- Master's Degree from ACAOM accredited school
- Completion of fifteen hours of science lab
- Demonstrated proficiency in English
- Successful passing of National exams in (3) areas: Point Location, Biomedicine and Foundations of OM
- Application and approval by the Committee on Acupuncture/MA Board of Registration in Medicine
- 30 hours of continuing education every two years