



Public Protection Through Quality Credentials

April 22, 2011

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

Dear Mr. Zachazewsk:

It has come to our attention that your office is reviewing whether an acupuncture technique known as “dry needling” falls within the definition of the practice of physical therapy in the Commonwealth of Massachusetts. As the only nationally accredited certification organization that assures entry-level competency of individuals entering the profession of acupuncture and Oriental (AOM) medicine, the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM[®]) has serious concerns regarding any regulation that allows physical therapists (PTs) without proper training and assessment to practice any form of acupuncture to include dry needling.

Dry needling has been defined as a form of acupuncture by the NCCAOM certified and licensed practitioners who use it as part of their medicine. Massachusetts requires acupuncturists who practice dry needling and other forms of acupuncture to meet recognized standards of competence and safety through a rigorous process including completing education from a school accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM) and the passing of the NCCAOM examinations for the Certification of Acupuncture.

The mission of the NCCAOM is to establish, assess, and promote recognized standards of competence and safety in acupuncture and Oriental medicine for the protection and benefit of the public. In order to fulfill this mission, we have developed a certification process that provides a unified set of nationally verified, entry-level standards for safe and competent practice.

It is with this high level of standards that certified acupuncturists are qualified to practice dry needling, which is a form of acupuncture. Unlike certified acupuncturists who received

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thousands of hours of training in many methods of acupuncture, PTs do not have a required curriculum for teaching dry needling to PTs. In addition, PTs do not have to successfully complete any assessments for the safe and competent practice of dry needling. This insufficient education and lack of an assessment of competence is not representative of the training that is necessary for the entry-level competence in any form of acupuncture, including dry needling. In fact, any new rule based on this lack of standards would directly contradict the licensing requirements that already exist in Massachusetts regulating the practice of acupuncture. Existing requirements for licensed acupuncturists include completion of an *accredited* education program and achieving NCCAOM Certification in Acupuncture, which includes passing examinations in Acupuncture with Point Location, Foundations of Oriental Medicine, and Biomedicine as well as documentation of an assessment-based clean needle technique certificate.

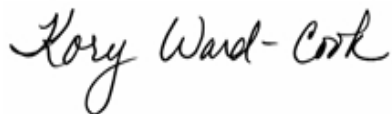
We consider the NCCAOM standards of eligibility, as well as successful performance on the examinations, to be the minimum requirements for the safe practice of all forms of acupuncture including dry needling. The level of competence accomplished by those completing the didactic, clinical, and practice hours attained by certified and licensed practitioners cannot be matched by those who would be practicing this form of acupuncture with hardly any training or assessment in this field. The practice of dry needling is more than merely placing needles at various points for different conditions. For this reason, the years of education and training that have been specified must be completed before a full comprehension of acupuncture diagnoses and treatments can be attained, and it is only from such a knowledge base that acupuncture's full efficacy and value can be realized by the public.

The NCCAOM is pleased to see that the Commonwealth of Massachusetts recognizes the need for adequate licensing procedures for all health care practitioners. Clearly, acupuncture, dry needling and other complementary and alternative therapies will be part of the health care landscape in years to come, as evidenced by recent studies and recommendations by the National Institutes of Health. It is the sincere hope of the NCCAOM that, in the interest of public welfare, the Board of Registration in Allied Health Professionals will recognize established

standards of professional competence in the practice of acupuncture and Oriental medicine in Massachusetts for the safety of its consumers. We highly recommend that physical therapists meet the *same* standard for education and examination that licensed acupuncturists must meet in order to practice safely and effectively in the Commonwealth of Massachusetts.

I hope you will find this information valuable. Please consider the NCCAOM as a resource for current information about the standards of competence and practice within the field of acupuncture and Oriental medicine. Please feel free to contact me by phone 904-674-2501 or by email, kwardcook@thenccaom.org, if I can offer further information on this topic.

Sincerely,

A handwritten signature in cursive script that reads "Kory Ward-Cook".

Kory Ward-Cook, Ph.D., MT(ASCP), CAE
Chief Executive Officer

cc: NCCAOM Board of Commissioners
Acupuncture and Oriental Medicine Society of Massachusetts
Commonwealth of Massachusetts Board of Registration in Medicine, Acupuncture
Committee