

# Please Support H 2006, An Act Relative to the Treatment of Pain

## Keep Acupuncture Safe and Consistent in the Commonwealth of Massachusetts

This legislation would ensure that  
**only licensed acupuncturists and MDs**  
practice acupuncture in Massachusetts.

- 1. “Dry needling” is acupuncture.** Inserting an acupuncture, dry, filiform needle into the body, under any pretense, for any purpose, is the practice of acupuncture. Any attempt to separate dry needling from acupuncture is an attempt to circumvent laws designed to keep the public safe.
- 2.** Tender or painful points, also known as “trigger points” or “motor points,” are **acupuncture points**.
- 3. “Dry needling” is an invasive, acupuncture needle intervention.**
- 4. “Dry needling” is not a “technique;” it is acupuncture.**
- 5. According to the Food and Drug Administration, (FDA),** anyone who is not licensed by law to practice acupuncture in MA cannot legally buy acupuncture needles. As class II medical devices mandating FDA prescription labeling on the packages, all acupuncture needle boxes state: “Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the states.”
- 6. Allied health professionals** who are not licensed by law to practice acupuncture state that they are not using acupuncture needles to perform “dry needling”. They are in fact using acupuncture needles, which are clearly labeled as such on the package.
- 7. “Dry needling” is outside allied health professionals’ scope of practice** and, more importantly, their education and training. Allied health professionals who are not licensed by law to practice acupuncture are inserting acupuncture needles without having been supervised, with little instruction and meeting no state or national standards.
- 8. Patients are not safe when “dry needling”** is performed by under-educated professionals. Real risks of acupuncture/“dry needling” performed by non-licensed acupuncturists include, but are not limited to, blood vessel, nerve and organ injury from inappropriate acupuncture needle angle and depth of insertion or from inappropriate acupuncture needle manipulation; furthermore, infection and cross infection from non sterile reinsertion of used acupuncture needles.
- 9. There are documented cases of injury** from the use of acupuncture needles by allied health professionals who lack the education and supervised clinical training and examinations of licensed acupuncturists.
- 10. In the Commonwealth of Massachusetts,** acupuncturists need for licensure 1905 didactic and clinical hours, with 100 hours of supervision in which the applicant is solely responsible for the care provided to patients. To be licensed one must pass all portions of the NCCAOM exam areas, graduate with an undergraduate degree and graduate from an accredited program of acupuncture. Licensed acupuncturists in MA need ongoing continuing education credits to maintain their licenses: 30 hours every four years, which is more than Allied health professionals do to obtain an initial 28 hour “dry needling” training.

For more details go to the AOMSM website:  
[www.aomsm.org](http://www.aomsm.org)

