

June 29, 2020

To Economic Affairs Interim Committee,

As a Licensed Acupuncturist, I disagree with the new rule of adding Dry Needling to your scope of practice. This brings my concern to the amount of hours that are not identified in your new rule ARM 24.126.2103(1)(a) to (3) of Dry Needling. In your reasoning it states "The procedure can also be applied to specific muscle motor points, spinal segments, and other structures including ligaments, tendons, and joint capsules for pain relief and increased mobility." You also have not stated what the minimal requirement is. "This new rule establishes criteria to ensure that chiropractors who perform dry needling meet minimum educational training and safety standards."

If you are going to allow needling into anything other than muscle motor points, more than 18 hours of CEU should be required. I feel that anything under 54 CEU hours of hands on training for all those areas to allow Dry Needling is not enough education to needle into joint capsules, spinal segments, ligaments and tendons. Classes for those areas are considered advanced classes not just a basic Dry Needling Course. If the board feels the 18 hour CEU course is enough to Dry Needle, I suggest a rewording to the rule and take out joint capsule, spinal segments, ligaments and tendons.

In Biomedical Acupuncture for Sports and Trauma Rehabilitation Dry Needling Techniques by Yun-Tao Ma used by in Dry Needling Courses. It states that "Dry Needling is a specific therapy for myofascial pain and other soft-tissue dysfunction." This is what I feel the 18 hour CEU course is teaching. Not anything advanced as joint capsules, spinal segments, ligaments and tendons.

As Acupuncturists, we have 850 hours of hands on clinical training. Not including the didactic hours. Acupuncture as a stand alone degree without herbal training is a 3 years Master's program. The total amount of hours is 2,385. This brings my concern to public safety. A 18 hour course is not an adequate amount of time/hours to safely Dry needle in all the areas that the Chiropractors are suggesting under the new rule ARM 24.126.2103(1) (a) to (3).

Thank you for hearing my concern.

Sincerely

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