

**From:** [Marc Nynas](#)  
**To:** [Murdo, Patricia](#)  
**Subject:** [EXTERNAL] Dry Needle Comment  
**Date:** Tuesday, June 30, 2020 7:15:42 AM

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Pat- I'm hoping you can disburse my comment to the committee members? Thanks, Marc Nynas

Greetings,

I'd first like to make perfectly clear that I am commenting on behalf of myself and not any of the organizations I've been affiliated with in any capacity. I've struggled how to translate my experiences but feel the need to make my comments on the dry needling proposed rule in front of you. I'm Dr. Marcus Nynas, I have been practicing in Billings since 2001.

I am a past president of the Montana Chiropractic Association, again not commenting on their behalf, and as such when I was the President dry needling was brought forth as a common question by new graduates coming to the state. Some of the schools had begun teaching it in their modalities classes and our scope of practice includes what is taught by accredited chiropractic colleges. I served as a preceptor to an intern from the University of Western States who had been taught dry needling there.

I was appointed to our State Board of Chiropractors in 2018, and again I am not commenting on their behalf. You can see we were still discussing dry needling at that time, and in our March of 2019 meeting you will note that we decided as it was taught in and by accredited chiropractic colleges this was in fact part of our scope of practice. At our next meeting our council thought it would be a good idea to develop rules for clarity which we started and that brings us here today. Part of that discussion we looked at the rules the state of Montana developed for physical therapists which we modeled our proposal after.

During my training at Northwestern College of Chiropractic I did go through the acupuncture program that they offer to chiropractic students. Completion of this allows us to practice in, at the time, thirty seven states, Montana is not one of those. I have also taken the Dry Needling Institute course sponsored by the Montana Chiropractic Association, done through the University of Western States, and PACE approved for continuing education. I can unequivocally state that the two procedures are different and distinct. Using dry needling I have no intention of balancing energies, moving chi along meridians, pulse and tongue diagnosis do not apply etc. Dry needling is very simply an option to release a trigger point, hypertonic muscle, fibrous adhesion etc. It's another tool in the tool box similar to IASTM, ART, Graston, contract relax, ischemic compression and many others. There are times when it is appropriate to try with patients and does get good results in what it is designed to do. And yes I still refer patients to local acupuncturists when they need it. Frankly I've referred more patients to acupuncture since we've started dry needling because it starts a discussion and they see that the needles in general do not cause pain.

I'm asking that the proposed rule be allowed to go through the rule making process including public comment periods.

Thank you for allowing me to comment, if you have any questions I can be reached at 406-294-2820.

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Billings Family Chiropractic