

Manning, Judy [IDPH]

From: mail@changemail.org
Sent: Monday, October 26, 2015 10:50 AM
To: Manning, Judy [IDPH]
Subject: 100 more people signed "Stop Dry Needling/Acupuncture by Physical Therapists in Iowa"

change.org New signatures

Iowa Board of Physical and Occupational Therapy – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.

Stop Dry Needling/Acupuncture by Physical Therapists
in Iowa

Petition by IAOMA Acupuncture · 100 supporters



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in the last 2 days**

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RECENT SUPPORTERS



Julie Betts

Des Moines, IA · Aug 29, 2015

There is no substitute for working with actual experience of the real acupuncturist.



Marcia Brandt

Anamosa, IA · Aug 29, 2015

I only want people who actually attended an accredited acupuncture school to be using needles on me or anyone else.



Byong Yi

Des Moines, IA · Aug 28, 2015

Because I have friends that are highly educated in this field and don't want uneducated persons making them look bad.



Katherine Chuapoco

Des Moines, IA · Aug 28, 2015

As a licensed acupuncturist, I believe in the importance of proper education and training for anyone providing care by using an acupuncture needle. Please support this movement to ensure safe acupuncture and to eliminate dry needling in Iowa.



Shelly Teague

Rockwell City, IA · Aug 28, 2015

I go to an accupuncturist, she does an awesome job with me. She is very informative and knows exactly what she's doing. She also has had training for her position. There is room for accupuncturist, just like drs, dentist,etc. Let them do their jobs just like everyone else does. I will continue going to my accupuncturist even if my Dr takes it up.

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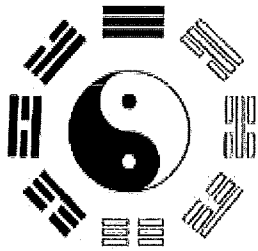
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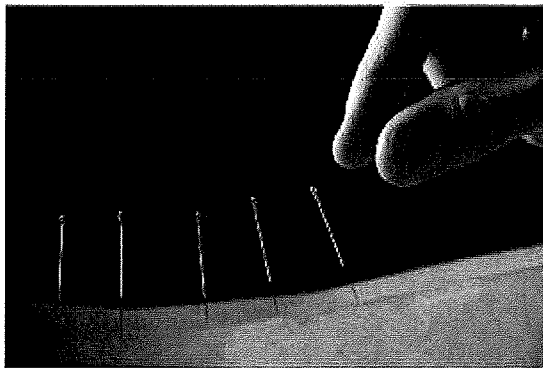
[Petitioning Tony Alden, Board Administrator Iowa Board of Athletic Training \(Tony Alden, Board Administrator\) and 8 others](#)

Stop Dry Needling/Acupuncture by Physical Therapists in Iowa

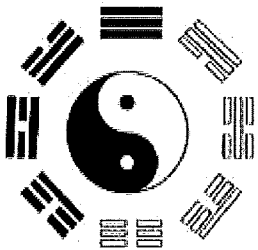


IAOMA Acupuncture Des Moines, IA

ONE IS DRY NEEDLING,
ONE IS ACUPUNCTURE,
CAN YOU TELL THE DIFFERENCE?



NEITHER CAN WE!



IAOMA Acupuncture

Des Moines, IA

963

Supporters

Dry Needling is a re-branding of Acupuncture designed to avoid the licensure rules that guarantee that Acupuncture needles are used safely and effectively.

In Iowa, Physical Therapists and Athletic Trainers are allowed to practice Dry Needling by their boards with as little as 24 hours of weekend training courses.

Help us protect the safety of the public by making sure people using acupuncture needles are properly trained experts in acupuncture.

In Iowa, persons other than graduate degree Licensed Acupuncturists are performing so called Dry Needling or Intramuscular Manual Therapy. These terms are a re-branding of an advanced

acupuncture technique called "lifting & thrusting," that had been perfected over centuries by highly trained and experienced Acupuncturists. While it can help relieve pain, it can be a very dangerous technique with serious potential adverse effects such as punctured lungs and injured nerves.

It should only be practiced by highly trained, nationally certified professional Licensed Acupuncturists.

Check out these videos of Dry Needling:

This video is very disturbing. A Dry Needle instructor punctures the patient's lung. He is teaching a weekend course to non-acupuncturists who would go unsupervised to practice techniques such as this.

https://youtu.be/EWb69O_NiE

This video shows a Physical Therapist breaking multiple rules of sterile field and safe needling. She re-uses needles and wipes the blood off using her glove. This is what happens when a non-acupuncturist learns to use acupuncture needles in a weekend course.

<https://youtu.be/A2Kk1CW3Org>

Unfortunately, due to the new name, Dry Needling, this technique evades state licensure laws and a growing number of non-acupuncturists are taking weekend (24 hr) courses and practicing on patients without any proper education nor supervision.

In Iowa, the Iowa Boards of Physical and Occupational Therapy and Athletic Training have allowed this technique to grow among Physical Therapists and Athletic Trainers by not restricting it to properly trained Licensed Acupuncturists.

The Iowa Association of Oriental Medicine and Acupuncture needs your immediate help to convince the Physical Therapy board and the Athletic Board to restrict this technique.

We have created a formal petition for this decision and had our public hearing by the PT Board on September 11, 2015. We now have until October 26, 2015 to collect signatures and comments in support of our campaign.

Please sign and share this petition and voice your concerns in the comments.

If you are a Physical Therapist, Occupational Therapist, or Athletic Trainer please mention that in your comments.

Letter to

Tony Alden, Board Administrator Iowa Board of Athletic Training (Tony Alden, Board Administrator)

Judy Manning, Board Administrator Iowa Board of Physical and Occupational Therapy
News8 Cynthia Fodor

Des Moines Register Carol Hunter

Des Moines Register Kathy Bolten

Des Moines Register Tony Leys

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Stop Dry Needling by Physical Therapists

Updates

1. 5 days ago
750 supporters
 2. 1 month ago
Petition update
-

Success at our first hearing!

Thank you for your support! We had a strong presence at our public hearing with the Iowa Board of Physical and Occupational Therapy. We have until October 26...

3. 2 months ago
500 supporters
 4. 2 months ago
Petition update
-

Thank You for your Qi!

The comments on this petition are incredible! We agree with you, acupuncture needles are the principle modality to acupuncture. If one uses acupuncture needles for...

5. 2 months ago
200 supporters
 6. 2 months ago
IAOMA Acupuncture started this petition
-

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Manning, Judy [IDPH]

From: Pat Martin <pmartin327@mchsi.com>
Sent: Wednesday, October 28, 2015 6:30 AM
To: Manning, Judy [IDPH]
Subject: Dry Needling by Physical Therapists

Good morning,

I wanted to share my thoughts on the practice of dry needling by physical therapists. I certainly understand that this practice may be beneficial to the overall therapy of a physical therapy patient. My concern comes with the lack of training and oversight of the practice within the physical therapy community. A better solution would be the partnering with a licensed acupuncturist (2500 hours of training, clinical practice with oversight, and nationally accredited graduate degrees). As medicine is practiced in the West, the recognition of the benefits of acupuncture to the patient are slowly growing and benefiting the patient. It is important that the progress also falls within the oversight that we have come to rely on (specifically the licensing agencies).

I appreciate your thoughtful approach to this issue.

Sincerely,
Patricia Martin

Manning, Judy [IDPH]

From: acupunctureiowacity@gmail.com on behalf of Rob Weingeist, LAc. <info@clinic-eight.com>
Sent: Tuesday, October 27, 2015 3:27 PM
To: Manning, Judy [IDPH]
Subject: Dry Needling and Acupuncture.

Dear Judy

I am a licensed acupuncturist practicing in the state of Iowa. I am concerned that DC's and PT's utilize "dry needling", which uses acupuncture needles. I don't think that they are properly trained to use acupuncture needles, which are the primary tool used by licensed acupuncturists. They may not injure their patients, but they may not help the patient. This may deter the patient from exploring the possibility that acupuncture done by a qualified practitioner could help them.

I have patients who are DC's and PT's. They come to see me, because they know that I have an understanding of how to properly use acupuncture points, trigger points, and motor points. Unfortunately, there are people with very little training who are willing to try using "dry needling" because they don't have any other tools. This is not fair. The patient's lose out, and the practitioners who have spent thousands of hours to perfect their skills lose out.

We will always have battles in medicine with scope of practice. My grandfather, father, and older brother are all ophthalmologists. I have worked in ophthalmology as a certified ophthalmic technician. Many times a patient would be seen for cataract surgery, and refer to their optometrist as their, "eye doctor". Although both the MD surgeon and the optometrist are called "doctor", a patient would most likely not be happy with their optometrist performing their cataract surgery. I believe it is essential to educate our patients, so that they are not given less than optimal treatment.

A certification program, or 100-hour long course, as learned by the chiropractor or physical therapist will not achieve the best possible outcome for the patient. I urge you to think about how you would like to be treated.

Thank you.

Sincerely,

Robert McGregor Weingeist, MS, L.Ac.

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Rob M. Weingeist MS, LAc.
Board Certified in Oriental Medicine

Licensed Acupuncturist

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t: www.twitter.com/cliniceight

p: 319 • 331 • 9312

October 27, 2015

Dear Ms. Manning and the Iowa PTOT Board,

I am writing to let you know that I firmly believe that it is **not** within the scope of practice of physical therapy to perform “Dry Needling” (acupuncture) and the Iowa PTOT Board should rule accordingly. Those physical therapists utilizing this technique in Iowa are operating outside the law and are not properly trained and licensed to perform acupuncture.

The claim is made that Dry Needling (DN) is not acupuncture and therefore the same rules and regulations that apply to acupuncturists do not apply those performing DN. This is simply not true. Dry needling IS an acupuncture technique simply called by a different name. Acupuncture consists of an acupuncture needle penetrating the skin. Dry needling consists of an acupuncture needle penetrating the skin. The both utilize the technique of needling into a sore spot of a muscle (called a “trigger point” by physical therapists and an “ashi point” by acupuncturists) to relieve tension and pain. The method of manipulation for DN (a lifting and thrusting technique) is one that has been used for thousands of years in Chinese medicine and is taught to students in Chinese medical school. They are both trying to achieve the therapeutic effect of pain relief and healing. The only real difference between DN and acupuncture is the training and license of the person using the acupuncture needle.

The practice of acupuncture is strictly regulated in the State of Iowa, and those who are licensed to practice it have to have met certain stringent requirements. I graduated from a Masters level program in Oriental Medicine. During this program, I had to take a full year of courses (including both biomedical and Chinese medical courses) before we were allowed to even **practice** needling on our fellow classmates. In my second year of study we began practicing on each other under direct supervision. It was not until my third year of schooling that we were allowed to put needles into patients in the student clinic, and that was also under the clinical supervision of a Licensed Acupuncturist. We spent hours learning the landscape of the human body (locations of organs, muscles, nerves, blood vessels, etc) and then even more hours learning how to needle into the body without doing harm to these structures and the patient. Needle placement, angle, depth and manipulation were all taught to me, and fine-tuned, by my teachers. We also took a day long course to become certified in Clean Needle Technique, so we could minimize the risk of infection and transmission of blood borne pathogens that comes with using an invasive procedure. All of my fellow acupuncturists had to complete this same rigorous training before we could take our boards, graduate, become Licensed Acupuncturists and legally perform acupuncture in the states we live in.

So, needless to say, it shocked me to find out that physical therapists were being allowed to practice acupuncture with as little as 24 hours of training in using an acupuncture needle and zero regulation by the State of Iowa. I realize they also put in many hours of study to learn about the structure and function of the human body, but working with the body from the **outside** with physical therapy techniques is vastly different from the invasive procedure of inserting a needle **into** the body. Much damage can be done with a

poorly placed needle and/or too aggressive manipulation (ex. pneumothorax, nerve damage, aggravation of injured tissue, etc). And the lifting and thrusting technique used in DN/acupuncture is an aggressive technique that needs to be used selectively and carefully. Only proper training can insure that no harm is done using this technique.

And when talking to the people in my community about this issue, I realized that the general population has no idea about the different standards of training of those who are advertising and practicing acupuncture/DN. Most people just assume that if a practitioner offers to perform some therapy for them, that they are properly trained to do it. And I think that by most peoples' standards, a 24 hour course is not sufficient to safely and effectively insert needles into the body. So for a physical therapist to practice an acupuncture technique is misleading, potentially dangerous and ultimately illegal. I believe this is unethical and unfair to the patient population who deserve the best possible care we can give them.

So I urge you to please rule that acupuncture/dry needling is not within the scope of practice of physical therapy. Physical therapy has its own unique role in the medical world, and I would welcome any physical therapist to my community who has done the proper training and become licensed to legally practice acupuncture in the State of Iowa. I don't want to exclude anyone from using this powerful medicine, but I do want to make sure that those who want to do it are properly trained and regulated to use it safely so that no harm comes to those we are trying to help.

Best regards,
Michelle Ybarra-Rojas, LAc.

Manning, Judy [IDPH]

From: Michael Young <genkiacupuncture@gmail.com>
Sent: Tuesday, October 27, 2015 10:51 AM
To: IAOMA
Cc: Manning, Judy [IDPH]; Valerie Hobbs
Subject: Re: trigger point info
Attachments: Letter re tp and acupuncture.docx; ATT00001.htm

Hi William and Judith,

I will attach a letter stating my experience teaching Trigger Points at Southwest Acupuncture College. I also mention my predecessor, Whitfield Reaves who taught this topic from the year 2000. Please let me know if there is anything additional I can do to help.

Regards,

Michael

PS - William, I had the same email address for Judith so I will try again, would you mind forwarding it to her in case mine does not go through?

524 Bross St.
Longmont, CO 80501
Younghealthcare.com
303-702-0219

William Terrell - iaomonline@gmail.com
Judith Manning - idph.iowa.gov

Dear Drs Terrell and Manning,

Thank you for letting me know about your situation. Valerie Hobbs, L.Ac requested that I write this letter. I am a full faculty member at Southwest Acupuncture College in Boulder, Colorado. I have been there since they opened in 1997.

I have taught Trigger Points as an elective since 2009. Before I taught it Whitfield Reaves, L.Ac., OMD taught this topic. While I cannot speak for other colleges, Trigger Point Therapy, as it was developed by Janet Travell, MD, is well covered in my opinion at Southwest Acupuncture College. The Travell books, both Volumes 1 & 2 are the required texts for this class. In addition we watch the Williams and Wilkin's videos of Dr. Travell.

Please contact me if I can provide further information.

Regards,

Michael Young, L.Ac.



OCT 29 2015

8230 Hickman Road,
suite B
Clive, Iowa 50325
515-331-8948

October 28, 2015

Dear Members of the Physical Therapy Profession,

My name is Elizabeth Terrell, a native of Des Moines. I am one of the original Registered Acupuncturists (currently: Licensed Acupuncturist A-04) in the state of Iowa. Along with my husband, William Terrell, L.Ac. (Iowa A-05) we founded the Iowa Acupuncture Clinic in 1997. When we arrived in Des Moines, the practice of Acupuncture by Nationally Certified graduate level trained acupuncturists was still highly controlled by the Iowa Medical Board due to the concern over the invasive nature of the practice of Acupuncture.

In 1999-2000, we lead the few Registered Acupuncturists to create and lobby the legislature for an improved licensure law. While we considered ourselves modern medical professionals, we had to be realistic in our definitions used in the Licensure bill due to the pressure from the medical profession and the ignorance about our medical training. For this reason, the definition of the practice of Acupuncture referenced modern and traditional Oriental medical concepts without expanding on our biomedical knowledge and training. While it is apparent now that others would use this subtle wording to claim that Acupuncture is *only based* on ancient medical theory, at the time it was inconceivable that any non-physician profession would try to use acupuncture needles and not respect the history and training that is required to safely and effectively practice. Our goal at that stage in Iowa was to make sure we were able to prove to the medical establishment that we, Diplomates of Acupuncture were qualified to practice Acupuncture safely. Since that time we have seen our professional reputation grow and our relationship with the Medical establishment solidify. Unfortunately, we have also seen a number of non-acupuncturists begin using acupuncture needles while not having the legal or training authority to practice. The current legal issue in front of your Board is the result of this unsafe, unethical and illegal practice.

Let me explain how and why I became an acupuncturist. My first medical experiences were working alongside various health professionals while a high school student working at a local pharmacy, a retirement center and the Iowa Methodist Hospital nutrition department. I was fascinated with medicine because I loved caring for those in need.

After completing my Certified Occupational Therapy Assistant training at Kirkwood Community College, I moved to Boulder, Colorado and began practicing hand therapy at the

Boulder Community Hospital, Mapleton Rehabilitation Center in the Occupational and Physical Therapy department. During this experience I learned two very important concepts:

1. Medicine is an extremely complicated subject and the best patient care is provided by highly trained experts working together in their respective professions, with their respective expertise. Patient centered specialized care is the most effective and safe method of care.
2. Often my hand patients were also patients of NCCAOM certified graduate degree acupuncturists. Colorado had been fortunate to have many first generation acupuncturists trained in the US during the 1960s and 1970s by Asian-born Master Acupuncturists. By 1990, the profession was thriving and had gained a strong reputation for safety and efficacy.

I also experienced firsthand this incredible medicine as I received life and health changing acupuncture from Dr. Johanna Reilley, ND, L.Ac, Dipl of Acupuncture. She would become my mentor, friend and eventually colleague. This direct experience with the success of Acupuncture led me to move to Santa Fe, New Mexico and earn my Masters of Science in Oriental Medicine degree at one of the original ACAOM certified acupuncture colleges, Southwestern Acupuncture College.

The process of achieving a Master's Degree in Oriental Medicine has been designed to ensure that all newly trained acupuncturists are safe and effective medical professionals. From the beginning our education strives for safety and integration into Western biomedicine including pre-requisites of 60-120 credits of undergraduate education including biology, chemistry and anatomy. My COTA degree was a perfect match for the Acupuncture education and I shared a class with numerous other medical specialists who wanted to practice Acupuncture. Included were physical therapists, registered nurses, massage therapists, chiropractors, psychologists, and medical doctors, including a neurosurgeon from Germany. This diverse group of students was mutually beneficial because we learned from each other as we immersed ourselves in both ancient and modern Acupuncture. It is this experience that first comes to my mind when I hear those in favor of Dry Needling falsely state that dry needling is a modern medical therapy and not Acupuncture because Acupuncture is solely based on ancient theories. *Every single* Acupuncture training college in the World requires graduates to understand both the ancient *and* modern biomedical aspects of Acupuncture. In many countries such as China, France and Germany, the majority of acupuncturists are Medical Doctors.

Once the Master's Degree education begins, students are educated and evaluated on the safety of acupuncture needle use. Prior to ever using an acupuncture needle, we are required to take the Clean Needle Techniques seminar to ensure we maintain sterility and begin to learn the proper safety rules when using acupuncture needles. This 8 hour course is a small but vital aspect of our first year of schooling. We then went through a mandatory yearlong course where all we did was observation in the student Acupuncture clinic. Half of those hours we directly

observed a Master Acupuncture professional, and the other half we observed the supervised clinic of senior Acupuncture students. Both of these important clinical courses made certain that we became very familiar with acupuncture needles and the safety required to use them prior to ever using a needle on another person.

During the second semester of the first year, we had a dedicated semester course learning how to needle in a direct hands-on practicum where we practiced on oranges and then onto ourselves and our classmates.

In addition to the clinical observations and preliminary needle education, we spent hundreds of hours on acupuncture point location related to both the traditional meridian systems and modern anatomy. For every acupuncture point learned, we were responsible for knowing exact anatomical locations, safe needle depth and direction. We also were expected to know the many serious contraindications of these points. In addition to these classes, we learned surface and musculoskeletal anatomy and the art of palpating the body to find traditional and ah-shi points. Since acupuncturists had pioneered the idea of "ah-shi" points and been part of the knowledge base of the investigation of "trigger points," we spent a lot of our time discussing and experiencing the various anatomical structures and the pathology that gives rise to the "ah-shi" or "trigger point" phenomenon. For instance, an "ah-shi" point is an area of tenderness found through palpation. If it happens to involve a knotted band of muscle we discussed the various techniques that can be used to release this tension and return normal muscle function. For "ah-shi" points on tendons, ligaments, fascia bands, and nerve ganglia, we learned the subtle and accurate needling angles to use in order to aid in the healing of those tissues. It is very important to note that the current style of "dry needling" by non-acupuncturists is a very vigorous style of Acupuncture. While it can be used in some cases of musculo-skeletal pain, there are many more cases that need a much more refined and gentle needle technique. It is through the many hundreds of hours of supervised acupuncture training that a student learns how to differentiate and discern the proper and safe needle technique. Many errors are caught and corrected during this methodical process.

After the first year of intensive education, the students are ready for more clinical experiences using needles under direct supervision of Master Acupuncture instructors. Again, many errors and safety issues are corrected to ensure that students graduating from a CCAOM acupuncture college will practice safely and effectively.

I cannot emphasize enough that throughout our extensive four year training program the holistic nature of acupuncture was often discussed in relation to western bio-physiology, neurology, anatomy and psychology. Any time a dangerous invasive or manual technique

was taught, the professors were in direct supervision over the students for many hours. This helps keep us all safe.

The last stage in our education was the administration of an extensive Oriental Medicine Nationally Certified exam. The exam took multiple days to complete and required knowledge of western biomedicine, Oriental medicine theories, clinical skills and safety and ethics. The exam administered by the NCCAOM is crucial in maintaining the quality, safety and efficacy of Acupuncture professionals. Our incredible training and exam process is directly responsible for the extremely low incidence of adverse effects, the minimal malpractice insurance premiums and the incredible national public and professional reputation of acupuncture. But Acupuncture is a dangerous procedure and it is only our high level of education that makes it seem less dangerous.

It is this reputation of safety and efficacy that is at issue with the use of acupuncture needles by non-acupuncturists. The fact that other professions want to learn "dry needling" is directly because of the decades of efficacy that define Acupuncture in the U.S. Our profession has spent centuries perfecting this medical art and science. Dry Needlers argue we should share acupuncture needles with them, but there are many reasons we shouldn't.

First, Acupuncture needles are the defining trademark of Acupuncture and Oriental Medicine. Second, the need for safety should not be compromised by marketing and desire for profits. Third, anyone who want to use acupuncture needles has the right to attend and graduate from an ACAOM accredited acupuncture college, pass the required national exam and become licensed by the state.

Fourth, Acupuncturist and any others are required to attain their MD, DO, PT or AT degrees in order to practice those trademark therapies.

Fifth, the use of acupuncture needles is a non-verbal trademark that is equivalent to the trademarked words, "chiropractic adjustment", or "osteopathic manipulation".

The use of acupuncture needles is the practice of acupuncture. It is the cultural and medical trademark of our profession. We have created a very successful profession in the US by maintaining high education and safety requirements. Any misuse of acupuncture needles results in patient injury and directly damages our professional reputation.

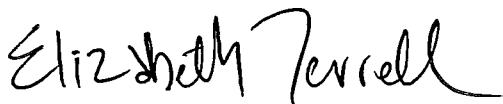
As a final note, it is with both honor and disappointment that I introduce the following documents from our Iowa Association of Oriental Medicine and Acupuncture. I am a founding member of this Association (1999) and proud of the accomplishments of our small group of Licensed Acupuncturists in the state of Iowa. Compared to the hundreds/thousands of

acupuncturists in places like New Mexico, California, New York and Washington, we are greatly outnumbered and out financed by other medical specialities.

My disappointment comes from experiencing the ego of other professionals who are blinded by slick marketing and desire for more scope. They show very little respect for the integrity of our ancient medical specialty and have little care that the poor quality of dry needling education impacts patient care and safety. Don't be fooled by the low instances of reported serious injury. Every acupuncturist has heard the stories of people who will not see them because a non-acupuncturist has failed to help them with acupuncture needles and often hear stories of very painful experiences. If this trend of poorly trained dry needling continues, there will be very serious injuries in Iowa as there has been in other states and countries.

Our clinic and profession have a strong respect for the traditional Physical Therapy practice that is represented by the Iowa Board of Physical and Occupational Therapy. Most days I interact with patients who have physical therapy and I often refer to Physical Therapists for their wonderful specialty. Until the advent of this dry needling marketing, we have been colleagues focused on patient centered care, just as my experiences of youth. It is my deepest hope that the traditional Physical Therapy community will realize that as well and stop this damaging issue once and for all.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Terrell". The signature is written in a cursive, flowing style.

Elizabeth Terrell, L.Ac. MSOM, Dipl. Ac (NCCAOM)

Licensed Acupuncturist

Master of Science in Oriental Medicine

Diplomate of Acupuncture - NCCAOM

Iowa Board of Physical and Occupational Therapy
321 E. 12th Street, Des Moines, Iowa 50319

Dear Members of the Board,

Our Association has brought forward a petition for a Declaratory Order to define Dry Needling / Intramuscular Manual Therapy as **not** within the legal scope of practice of Physical Therapy and Occupational Therapy.

This action was necessary due to the unsafe, unethical and illegal use of acupuncture needles by persons who are not Physicians nor Licensed Acupuncturists. Your Board is one of the reasons that this practice has taken hold in the state amongst Physical Therapists and others, such as Athletic Trainers, who follow your lead. The fact that your Board has never adequately researched nor sought out a formal public deliberation is the reason our Association issued this Petition in order to represent the safety of the public and the integrity of the health professions in Iowa.

As was expected, the Iowa Physical Therapy Association along with its parent the American Physical Therapy Association has presented a counter petition along with a legal brief to defend their position.

Attached to this letter is our formal rebuttal to the Brief of the APTA/IPTA Petition to Intervene. You will find our arguments very legally sound and we would expect your board to reject the APTA Petition to Intervene in totality. In fact, it is telling that the Petition fails to discuss the history and safety issues around Dry Needling. Rather, the Petition repeats the same illogical and self-serving arguments that have resulted in administrative and judicial rulings against the use of Dry needling by professions who do not have **explicit legal right to use acupuncture needles**.¹

The APTA arguments that are shown to be **false** are:

1. Dry Needling is not acupuncture.
2. Dry Needling is allowed by Physical Therapy statutes, because they are allowed to use "mechanical devices" and "physical agents"
3. Physical Therapists are legally able to use acupuncture needles.
4. The use of acupuncture needles by Physical Therapists is not in conflict with the license to practice acupuncture nor the license to practice medicine.
5. Physical Therapists are allowed to use the invasive therapy of acupuncture needles due to an administrative rule that allows Physical Therapist to debride and care for wounds.
6. Physical Therapists should be allowed to use acupuncture therapy because they are exempt from the medical practice act, Iowa Code 148.
7. We would argue the APTA's use of the five state Attorney Generals opinions as supportive of PT dry needling are actually ambiguous and incomplete.

Other manipulations of the issues involved in Dry Needling are found throughout their Brief.

¹ Recent rulings against PT Dry Needling in Tennessee, Washington, Oregon, Illinois have resulted from thorough review of the legal scope of practice issues related to the use of acupuncture needles.

The fact that the APTA argument contains this level of inaccuracies and false logic is troubling. The premise of the regulation of health professions hinges on the ethical and legal boundaries that need to exist between these professions in order to properly and safely care for the public.² If a profession manipulates its argument in order to take a legitimate therapy of another profession, then the public health is at risk. It is the ultimate responsibility of a licensing board to prevent this risk by ensuring the integrity and competence of its licensees.

The use of acupuncture needles by a profession that has minimal training in invasive techniques, lacks the explicit legal authority to use those needles and uses its professional association to manipulate the history of acupuncture is in direct violation of that Board responsibility.

We reiterate, the principle role of the Iowa Board of Physical and Occupational Therapy is to promote the public health, welfare and safety. To ensure this role, the Board is responsible for establishing rules and regulations to ensure the integrity and competence of licensed physical and occupational therapists. By allowing the use of acupuncture needles by its licensees, the Board has failed in both of these vital roles.

We strongly request that the Iowa Board of Physical and Occupational Therapy properly rule ***that the use of acupuncture needles and/or the practice of dry needling / intramuscular manual therapy should not and never should be allowed by Physical Therapists.*** Any current or future use of acupuncture needles by Physical Therapists violates the integrity and competency of the Physical Therapy profession.

The Licensed Acupuncturist profession believes it is our duty and right to be the authority on the use of acupuncture needles. Our profession has existed for five millennia. Ancient theories have evolved along with technology, medical clinical experience and scientific research. The claim made by proponents of Dry Needling that it is a distinct form of therapy because acupuncture is based on ancient non-western theories is false. Acupuncture has been used and researched by Asian, European and American science for at least 200 years.³

In Iowa, the definition of the practice of acupuncture is:

[A] form of health care developed from traditional and modern oriental medical concepts that employs oriental medical diagnosis and treatment, and adjunctive therapies and diagnostic techniques, for the promotion, maintenance, and restoration of health and the prevention of disease.

²The reason for all laws restricting this and other professions is the protection of the public, and to that end the legislature has seen fit to enact laws and provide means for enforcing the regulations governing the practice of the various forms of the art of healing, permitting each practitioner to follow his profession according to its established principles. Each may have its merits; but those persons who are authorized to practice one form of the art may not encroach upon another form for which they have no authority from the state." Dept of Health v. Van Wyk, 1982 Iowa Supreme Court.

³ European documentation exists that as early as 1820 there were physicians utilizing acupuncture. George Soulie de Morant (1878-1955), in Volume I of his treatise, L'acupuncture Chinoise, (1939-1955)

Often this wording is limited by DN proponents to imply that Acupuncture is not based on modern bio-physiology and anatomy. This is patently false for the following reasons:

1. Traditional Oriental Medicine has been in communication with Western medical theories and knowledge for many hundreds of years. In fact, our use of the organ names such as "liver" and "heart" are direct incorporations of 18th century western anatomy.
2. Since the 1800's western physicians have analyzed and practiced traditional Oriental Medicine, adding their bio-physiological concepts to the ancient understanding of meridians, yin, yang, qi and blood. In particular, the French have over 100 years of documenting the electrophysiology of the meridians and acupuncture points.⁴
3. According to the 1972 article by Toyama, P. M., and M. Nishizawa, "The Physiological Basis of Acupuncture Therapy" in the Journal of the National Medical Association,

The therapeutic value of acupuncture has been recognized beyond question in the Orient for more than 3000 years, but has not been well known in the Western hemisphere until recently. During the past 30 years [since 1940s], a number of textbooks on acupuncture have been translated into major European languages. The results of its clinical trials have been documented, and further research is in progress in many hospitals and medical centers in France, Germany, Great Britain, Italy, Switzerland, Poland, Czechoslovakia, and the U.S.S.R.

4. The education standards and national examination requirements for nationally certified Licensed Acupuncturists includes at least 450 hours of education in western biomedicine training.⁵
5. This integration of Western biomedicine research and education into Acupuncture clinical theories is properly described as **modern Oriental Medicine** concept.

It is within these modern concepts that trigger points are defined as equivalent to "ah-shi" points and the dry needling therapy of vigorous manipulation of these points was developed from the traditional acupuncture technique called "lifting & thrusting." It is solely a marketing idea that Dry Needling was developed independently from Acupuncture. In fact, most of the research that is presented on dry needling uses acupuncture as synonymous.⁶

The denial that Dry Needling is not Acupuncture also serves an unethical purpose, the attempt to circumvent state Acupuncture laws.

⁴George Soulie de Morant (1878-1955), in Volume I of his treatise, L'acupuncture Chinoise, (1939-1955)

⁵<http://www.nccaom.org/applicants/eligibility-requirements>.

⁶"While many of these studies directly use the term 'dry needling',^{5,18,21,26,33,56,64,67,104,110} in their methodology, other studies use alternative terminology such as 'deep dry needling',⁶⁷ 'superficial dry needling',^{55,128} 'TrP acupuncture',^{20,80} 'paraspinal needling',⁶⁴ 'intramuscular and nerve root needling',⁶⁵ 'needle electrical intramuscular stimulation',¹²⁹ 'needle release',¹¹³ 'acupuncture needling',^{63,113} 'needling therapy',¹⁷ 'acupuncture',^{36-38,40,41,47,49-55,61,69,72,81-88,90,92,94-100,105-108,112,115-117,119-123,130-135} and 'electroacupuncture'.^{37,46,93,126,127,136-139} Some studies have even chosen to use both 'acupuncture and dry needling'^{19,23,24,62,77} in their titles."

Dunning, James et al. "Dry Needling: A Literature Review with Implications for Clinical Practice Guidelines." Physical Therapy Reviews 19.4 (2014): 252-265. PMC. Web. 13 Oct. 2015.

The development of trigger points and later dry needling did not arise spontaneously. Rather, it was **directly** influenced by acupuncture research. Any argument to the contrary is marketing propaganda. This can be seen by understanding the implied meaning of the following from the APTA Educational Paper on Dry Needling:

Barring specific prohibitive language in the state's physical therapy licensure statute, the performance of dry needling by a physical therapist may be determined by the state regulatory board to be allowed, **provided that** the physical therapist is competent to do so, and **does not profess to be engaging in the practice of another profession**. For example **it would be inappropriate and a violation of state law for a physical therapist to refer to the performance of dry needling as "acupuncture" as acupuncture describes the scope of services and interventions provided by an acupuncturist**. Conversely the performance of an intervention such as therapeutic exercise by an acupuncturist should not be referred to as "physical therapy" as "physical therapy" describes the services provided by a licensed physical therapist.⁷ (Emphasis added.)

If the APTA and other PT Dry Needling proponents were to admit the proper history and etiology of the use of acupuncture needles in dry needling, there would be no market for dry needling by Physical Therapists, nor an ability to expand the scope of practice of physical therapy to include invasive therapies beyond their state mandated manual therapy definitions.

The unfortunate reality for the Physical Therapy profession is the following:

1. Any use of acupuncture needles is viewed by the general public as acupuncture due to those needles being the trademark of the very popular, successful and modern acupuncture.
2. Without explicit legislative and judicial permission to penetrate the skin with an acupuncture needle, any use of acupuncture needles is legally forbidden due to it being within the practice of medicine and surgery.
3. In fact, this was the thought in 2010 expressed by the Executive Director of the IPTA in an email about the legality of Dry Needling by Physical Therapists.⁸ What changed since that time? More dry needling courses marketing directly at Physical Therapists.
4. The continuation of the IPTA and APTA marketing and promotion of dry needling by Physical Therapists will only serve to further degrade the professional relationship between the Physical Therapists and the Acupuncture Community (including our very supportive patients and medical colleagues). The public negatively views the co-opting of the trademark acu-

⁷APTA Department of Practice and APTA State Government Affairs. *Physical Therapists & The Performance of Dry Needling. An Educational Resource Paper*. January 2012

⁸ "To the best of my knowledge, dry needling has not been recognized by the Iowa Board of Physical and Occupational Therapy (the licensure board) as being within the scope of practice of Iowa PTs. Furthermore, the Iowa Board of Medicine has adopted rules declaring that "invasive" pain management is the practice of medicine. The inference there is that the application of trigger point dry needling by a PT could subject the PT to charges of practicing medicine without a license (because it is an invasive technique). However, the rulemaking does not specifically address dry needling. The rulemaking is attached.

Only the licensure board can rule on scope of practice issues, and IPTA/APTA/AAOMPT have no authority in this area. To pursue this, you should formally petition the licensure board to rule on whether this is within the scope of practice of Iowa PTs."

June 21, 2010 email received by Judy Manning of the Iowa Department of Health sent by Michael Mandel, Executive Director, Iowa Physical Therapy Association & Foundation

puncture needle by the PT profession. Comments throughout online petitions⁹ and public comments submitted to this Board are very clear: Only Acupuncturists should be allowed to use acupuncture needles.

The Iowa Association of Oriental Medicine and Acupuncture was impelled to create this petition due to the unsafe, unethical and illegal nature of dry needling performed by persons lacking the education and expertise required to use acupuncture needles. Acupuncture is a very invasive therapy and as such, the US acupuncture community has developed extensive training and safety protocols to protect the public health.

We believe that the safety, ethics and legal arguments contained in our petition along with the mass of material submitted for consideration show that there is only one proper decision that can be made by the Iowa Board of Physical and Occupation Therapy. That decision is:

The practice of Dry Needling / Intramuscular Manual Therapy is **not** within the legal scope of the practice of Physical Therapy and Occupational Therapy.

Sincerely,



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⁹over 2500 signatures cumulatively between two online petitions (comments attached to this letter):
<https://www.change.org/p/stop-dry-needling-acupuncture-by-physical-therapists-in-iowa>
<https://www.change.org/p/protect-the-public-only-licensed-acupuncturists-should-be-allowed-to-use-acupuncture-needles>

BEFORE THE IOWA BOARD OF
PHYSICAL AND OCCUPATIONAL THERAPY

The Iowa Association of Oriental Medicine and Acupuncture (IAOMA) submits this Paper in response to the Brief presented by the Iowa Physical Therapy Association (IPTA) and American Physical Therapy Association (APTA) on 9 September 2015.

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Setting the Context, Defining the Words

One of the main arguments in the IPTA/APTA Brief is that acupuncture needles fall under the plain or common meanings of “mechanical” “device” and “physical” “agent,”¹ and thus can be used in “dry needling” as part of the Physical Therapy scope of practice. They make this point by referring to *In re estate of Melby*: “Absent a statutory definition or meaning established by the law, courts give words their common and ordinary meaning by considering the context in which they are used.” IPTA/APTA’s use of this source prompted them to look up the above four words in *Merriam-Webster* dictionary, and from the definitions found therein asserted that acupuncture needles are both physical agents and mechanical devices.

We disagree. In the case of *In re estate of Melby*, the discussion at hand was financial, meaning the context in which the words under question were used was fundamentally different from the current discussion before the Board. It is the Board’s **responsibility** to respond to the Petition for a Declaratory Order by looking at the **medical meaning of the words** found in our Petition for a Declaratory Order: **Acupuncture, Physical Therapy, medical device, etc.** This is the only way of adequately “considering the context in which they [the words] are used.”² The current context being medical rather than financial (as in the case of *Melby*) necessitates the context of the discussion to be shifted accordingly. To that end, we present the following definitions for your consideration.

These definitions come from *Taber’s Cyclopedic Medical Dictionary*, 22nd Edition 2013.

¹ Notably, they make this argument by defining each word individually, rather than properly acknowledging the syntactic importance of adjectives being taken *with* their respective nouns.

² *In re estate of Melby*.

Acupuncture:

A technique for treating pain, producing general anesthesia, treating acute or chronic illness (such as hormonal, immune, or orthopedic), or preventing disease **by passing thin needles through the skin into specific points on the body**. The free ends of the needles are manually twirled, heated by moxibustion, or connected to a weak electrical current. They are then typically left in place for about 20 min. Although acupuncture has a variety of uses in Asia and Europe, in the U.S. it is principally considered **a treatment for local pain**. It is often used in combination with local therapies, including massage, meditation, and herbal remedies. Research suggests that acupuncture relieves pain by **stimulating** the release of endogenous opioids, other neurotransmitters (such as serotonin), and by **directly affecting afferent nerve fibers**. Acupuncture has also been found useful in veterinary applications. In the U.S. **professional proficiency is attained by passing an examination administered by the National Commission for the Certification of Acupuncture and Oriental Medicine of the American Academy of Medical Acupuncture**.³ (!) It is important that the acupuncturist use sterile or disposable needles and that **care be taken to prevent puncturing adjacent organs**. (Emphasis added.)

Physical Therapy:

A profession that is responsible for management of the patient's movement system. This includes conducting an examination; alleviating impairments and functional limitation; preventing injury, impairment, functional limitation, and disability; and engaging in consultation, education, and research. Direct interventions include **the appropriate use of patient education, therapeutic exercise, and physical agents such as massage, thermal modalities, hydrotherapy, and electricity**. SYN: *physiotherapy* (Emphasis added.)

Manual therapy:

A collection of techniques in which hand movements are skillfully applied to mobilize joints and soft tissues. These techniques may be used to alleviate pain, improve motion, induce relaxation, reduce edema, and improve pulmonary and musculoskeletal function. SEE: *manipulation; joint mobilization; soft tissue mobilization*.

The medical definitions of the above health professions are similarly supported by non-medical dictionaries.⁴ The definition of Acupuncture clearly involves the use of acupuncture needles,

³ The standards required by the NCCAOM are extensive. For information on how the NCCAOM works and its national standards, visit <http://www.nccaom.org/about/nccaom-national-standards>.

⁴ "Acupuncture: a method of relieving pain or curing illness by placing needles into a person's skin at particular points in the body; an originally Chinese **practice of inserting fine needles through the skin at specific points** especially to cure disease or relieve pain (as in surgery)." *Merriam-Webster Dictionary*. Web source.
"Physical Therapy: the treatment of disease, injury, or disability by physical and mechanical means (as massage, regulated exercise, water, light, heat, and electricity)." *Merriam-Webster Dictionary*. Web source.

whereas the definition of Physical Therapy (and Manual Therapy, included here because Physical Therapy is also a manual therapy) **list only non-invasive techniques, none of which imply that physical therapists are qualified to perform invasive procedures involving the use of acupuncture needles.**

In trying to justify the use of dry needling (Acupuncture), the Brief mentions the Commission of Accreditation of Physical Therapy Education's (CAPTE) "Evaluative Criteria Guide" and the current online version "Guide 3.0," pointing out the following information from that source:

Manual therapy techniques may include the following:

Manual lymphatic drainage

Manual traction

Massage

 Connective Tissue massage

 Therapeutic massage

Mobilization/manipulation

Dry Needling

 Soft Tissue

 Spinal and peripheral joints

Neural tissue mobilization

Passive range of motion⁵

The Associations claim that dry needling (Acupuncture) is a manual therapy, but even in the list provided by the CAPTE it is the **only** invasive technique. What seems especially odd is, if the Physical Therapy profession claims trigger points should be a standard part of Physical Therapy, why is there no mention of the **manual manipulation** of trigger points? This missing uncontroversial manual technique would be the only one related to

"**Acupuncture**, in the strictest sense, refers to the insertion of **dry needles**, at specially chosen sites for the treatment or prevention of symptoms and conditions." (Emphasis added.) From the Center for Medicaid/Medicare Services.

⁵ APTA Guide 3.0

trigger points that physical therapists could properly list under manual therapy techniques. **And yet, they choose to overlook manual manipulation and jump straight for dry needling (Acupuncture) instead, regardless of what it means to be manual versus invasive.**

Acupuncture Needles - Class II Medical Devices

Turning to the actual definition of acupuncture (or “dry”) needles is more difficult, because neither non-medical nor medical dictionaries have definitions of needles which include the subset of acupuncture needles. Fortunately, **the FDCA has defined and classified them as Class II prescription medical devices.** When the FDA reclassified acupuncture needles from Class III to Class II prescription medical devices it was stated that an acupuncture needle is a “device intended to pierce the skin **in the practice of acupuncture**” 21 CFR § 880.5580(a) (emphasis added). The reclassification of acupuncture needles also applied to “substantially equivalent devices of this generic type,” under which specifically-labelled “dry needles” (such as those sold by Myo Tech) would fall. All filiform needles are medical devices, and defined as acupuncture needles. This includes those whose function is to induce an electromagnetic pulsation intended to relieve pain.⁶

It would also be prudent to point out at this juncture that the FDA believes that information for use, including: indications, effects, routes, methods, and frequency and duration of administration; and any hazards, contraindications, side effects, and precautions are commonly known **to qualified practitioners of acupuncture.** Therefore, under § 801.109(c), such indications do not need to be on the dispensing packaging, but sale must be **clearly restricted to qualified practitioners of acupuncture as determined by the states.**⁷ (Emphasis added.)

This explicit FDA ruling nullifies the claim made by APTA in its response to the letter from the NCASI in January of 2014.⁸ APTA and its legal counsel claimed that “the FDA stated that

⁶ “Electroacupuncture: Stimulation of acupuncture points using transcutaneous electrical nerve stimulation (TENS) or other therapeutic electrical stimulation currents applied via needle or through implanted electrodes.” Definition found in *Taber’s Cyclopedic Medical Dictionary*, 22nd Edition 2013.

⁷ §801

⁸ National Center for Acupuncture Safety and Integrity. Web: acupuncturesafety.org

This organization has sent letters to the Iowa Board of Physical and Occupational Therapy warning that the use of acupuncture needles by Physical Therapists is unsafe and illegal.

acupuncture needles are for use by qualified practitioners as determined by the states.”⁹ This led the APTA to erroneously assume the FDA “was clearly signaling that it would not involve itself in determining who is a qualified practitioner to use acupuncture needles, leaving it to the states to decide.”¹⁰ This is a half-truth. The FDA *does* state that acupuncture needles are for use by “qualified practitioners as determined by the states,” but it more **explicitly** states elsewhere that those using acupuncture needles **must be** “qualified practitioners of **acupuncture** as determined by the states.”¹¹ The more explicit statement takes precedence over the less, invalidating the claim that physical therapists could be considered among the practitioners qualified to buy and use acupuncture needles. The FDA **clearly states** the knowledge needed to safely and effectively use acupuncture needles is “commonly known to qualified practitioners of **acupuncture**” and as such acupuncture needles “**must be** clearly restricted to qualified practitioners of **acupuncture** as determined by the states.” The fact that acupuncture needles are Class II Medical Devices means they are “a device which, because of any potentiality for harmful effect, or the method of its use, or the collateral measures necessary to its use **is not safe except under the supervision of a practitioner licensed by law to direct the use of such a device.**” The role of the states is to determine who is a qualified practitioner of acupuncture, not who is qualified to use acupuncture needles. Only licensed and qualified acupuncturists, **the qualifications and licenses for Acupuncture being determined by the Iowa Board of Medicine**, are licensed “by law to direct the use of” acupuncture needles.¹²

⁹ Memorandum from Paul Rockar, Jr to APTA Component Leaders, et al. January 6 2014

¹⁰ Ibid.

¹¹ 21 CFR § 880 and § 801

¹² Iowa Code 148.E, Practice of Acupuncture.

Dry Needling is Acupuncture

Those who seek to have dry needling (Acupuncture) within the scope of practice of Physical Therapy often assert that dry needling isn't acupuncture. In order to prove dry needling is, and always has been, Acupuncture, we will point to the following definitions also found in *Taber's Cyclopedic Medical Dictionary*, 22nd Edition 2013.

Needling:

Inserting an acupuncture needle into the body.

Dry n. Intramuscular stimulation.

Trigger point dry n. ABBR: TrP-DN. Intramuscular stimulation.

Stimulation:

An irritating or invigorating action of agents on muscles, nerves, or sensory organs by which excitation or activity is evoked.

Intramuscular s. ABBR: IMS. The insertion of **solid needles into sensitive or painful body parts** in order to alleviate musculoskeletal, myofascial, or nerve pain. SYN: dry needling; trigger point dry needling. SEE: *trigger point*.¹³

Percutaneous electrical nerve s. ABBR: PENS. A treatment for pain in which weak electrical currents are applied to **acupuncture needles inserted into trigger points** or dermatomes near painful body parts. PENS is sometimes used to treat episodic low back pain and other regional pain syndromes. It may be used as an alternative to transcutaneous electrical nerve stimulation (TENS). (Emphasis added.)

Transcutaneous electrical nerve s. ABBR: TENS. The application of mild electrical stimulation through electrodes placed on the skin over a painful area. It alleviates pain by interfering with transmission of painful stimuli.

Point:

1. The sharp end of any object. 2. The stage at which the surface of an abscess is about to rupture. 3. A minute spot. 4. A position in space, time, or degree. 5. An area of skin that overlies a bony prominence and is subject to pressure injury or ulceration.

Acupuncture p. **Any anatomical location used in acupuncture to relieve symptoms or treat disease.**

Ah-shi p. **A tender point on the body; a trigger point.**

Trigger p. 1. An area of tissue that is **tender** when compressed and may give rise to pain and tenderness. 2. An area of the cerebral cortex that, when stimulated,

¹³ The Center for Medicare/Medicaid Services also defines Intramuscular Stimulation on the page on Acupuncture, saying: "Intramuscular stimulation is a technique of applying needles to areas of tenderness." Both this and the previous definition from CMS can be found at <https://www.cms.gov/medicare-coverage-database/details/technology-assessments-details.aspx?TAId=18&bc=AAAQAAAAAAAA#appen>

produces abnormal reactions similar to those acquired in epilepsy. SYN: *trigger zone*. (Emphasis added)

Ah-shi point:

Ah, yes! (referring to the point of pain) SEE: under *point*.

The above definitions work in coordination to prove one basic fact: dry needling is Acupuncture.¹⁴ There is no difference between a trigger point and an *ah-shi* point—in fact, the very definition of an *ah-shi* point indicates that its synonym is a trigger point, and *ah-shi* points have been a documented part of Acupuncture since 1000 B.C.E. Furthermore, the definition of Acupuncture states that it relieves pain through *stimulation*, and the definition of Intramuscular Stimulation once again points back to Acupuncture by referring to its synonym, dry needling. **Since Acupuncture can only be practiced by Licensed Acupuncturists, dry needling (Acupuncture) is thus precluded from being practiced by non-licensed acupuncturists, which would include physical therapists.** Those parties who attempt to circumvent the meanings of these words sometimes try to add the word “manual” to intramuscular stimulation (IMS) or intramuscular therapy. This in no way negates the fact that intramuscular stimulation is dry needling, which is a subset of needling, which is the use of an acupuncture needle in the technique known as Acupuncture. IMS is an invasive procedure, **not a manual technique.**

¹⁴ As further evidence that dry needling is not a distinct therapy from Acupuncture, examine the following CPT Codes:

97810: Acupuncture, 1 or more needles; without electrical stimulation, initial 15 minutes of personal one-on-one contact with the patient. (Aug. 06. Volume 16, Issue 8, August 2006)

97813: Acupuncture, 1 or more needles; with electrical stimulation, initial 15 minutes of personal one-on-one contact with the patient. (Jan 05. Volume 15, Issue 1, January 2005)

No CPT code results found for search criteria “dry needling”

No CPT code results found for search criteria “intramuscular manual therapy”

No CPT code results found for search criteria “intramuscular manual stimulation”

No CPT code results found for search criteria “trigger point injection”

Found at <https://ocm.ama-assn.org/OCM/CPTRelativeValueSearch>

The only CPT involving acupuncture needles is Acupuncture, whether the needles are carrying electrical stimulation or are “dry.”

Medical Devices are neither explicitly nor implicitly allowed in Physical Therapy

The definition of Physical Therapy in both medical and non-medical dictionaries never mentions needles. Acupuncture specifically does. And since acupuncture needles (and “substantially equivalent devices of this generic type”¹⁵) are defined as *medical* devices, the argument that they may also fall under the category of *mechanical* devices is discounted. **The purpose of the adjectives “medical” and “mechanical” is to distinguish one type of device from the other, ergo what is a medical device is not automatically also a mechanical device.** This is an important distinction specifically since the more exclusive, controlled, and dangerous of these two categories is a medical device. Confusing or conflating the two terms runs the risk of allowing inadequately trained individuals to use controlled devices improperly. This is the case with non-acupuncturists using acupuncture needles. The Board cannot claim physical therapists can use medical devices, which is why the licensure law uses the words “mechanical” and not “medical.” There are many medical devices that are outside the scope of practice of Physical Therapy, indicating that a precedence exists for physical therapists *not* being allowed to use medical devices. One such device is the endotracheal tube. Under Iowa Code 645—200.1(147) “Definitions,” the following is stated:

“Physical Therapy” means that branch of science that deals with the evaluation and treatment of human capabilities and impairments, including:

1. Evaluation...
2. Use of...
3. Use of...
4. Use of rehabilitative procedures
 - Manual therapy...
 - Therapeutic massage...
 - Prescription...

¹⁵ 21 CFR § 880

Airway clearance techniques

...
The use of endotracheal tubes is related to airway maintenance and clearance. However, due to the specialized training needed to safely and effectively use this medical device, endotracheal tubes cannot be used by non-physicians. Even if physical therapists wanted to claim they can use medical devices, this would still not automatically allow them to use the full range of medical devices that exist. As the FDA stated in regards to acupuncture needles, medical devices are sometimes restricted to use by professionals trained specifically for their use.

As for the argument that acupuncture needles are “physical agents,” and thus part of the current scope of practice for physical therapists, it is true that acupuncture needles are physical agents. This is because the terminology is deliberately broad, so that the scope of practice of Physical Therapy isn’t denied opportunities to advance as new techniques are found. That said, there are many “physical agents” that physical therapists are not allowed to use. For instance, pain medications are physical agents. They can be seen, tasted, touched, and smelled, meaning they are physical. They also have a “chemically...active principle,” so they are agents.¹⁶ However, because of Iowa Code 148A.5 “Limitations,” the Board knows a license to practice Physical Therapy does not authorize a physical therapist to administer or prescribe medicine or drugs. At the same time, physical therapists *are* allowed to use “physical agents” in order to “prevent, correct, minimize, or alleviate a physical impairment” (148A.1). This shows that the broad generality of the term “physical agent” allows for new techniques to be added to the scope of practice of Physical Therapy, but it does *not* allow a physical therapist to use any or all agents that fall under that category. Exceptions do, and must, exist to keep professions from infringing

¹⁶ This phrase is borrowed from the definition of “agents” as provided in the IPTA/APTA Brief.

upon others and to keep the public safe from practitioners of certain health professions trying to be jack-of-all-trades rather than experts in any one trade. The reasons physical therapists cannot administer or prescribe drugs are obvious:

First, they don't have the training to do so, despite their knowledge of biochemistry;

Second, there are other licensed health professionals who are specifically qualified to provide this intervention.

The same reasons should preclude a physical therapist from using an acupuncture needle. Yes, acupuncture needles are "physical agents," but they are specifically *medical* devices and ought to remain only in the hands of those individuals who are specifically permitted to use them. Moreover, the list of physical agents associated with Physical Therapy in a variety of sources includes heat, cold, light, water, and similar objects. Chapter 148A specifically includes "mechanical devices, heat, cold, air, light, water, electricity, and sound." Of the physical agents therein described, **none** are invasive and **none** have the same level of risk associated with them as is associated with Acupuncture. The act of Acupuncture is 12 to 100 times more dangerous than the most dangerous Physical Therapy modality.¹⁷ Therefore the addition of dry needling (Acupuncture) does not fit into the context of the Physical Therapy scope of practice.

¹⁷ This statistic comes from data which records the probability of pneumothorax due to an acupuncture needle. That probability is a little less than 1/10,000, whereas cervical manipulation's incidence of adverse effect is between 1/120,000 to 1/Million.

Invasive Procedures and Techniques

The Petition for a Declaratory Order asserted that physical therapists are not statutorily allowed to puncture the skin or practice invasive therapies, as invasive procedures and techniques are reserved for the practice of medicine unless otherwise authorized.¹⁸ The IPTA/APTA Brief disagreed, citing Administrative Rule 645-200.1(147) “Definitions” in which it is stated that the practice of Physical Therapy authorizes physical therapists to use devices which will help in debridement and wound care (in addition to other manual therapies and non-invasive interventions). While it is true debridement and wound care have components that require sterile fields and directly deal with body tissue, the comparison between the penetration of the skin with an acupuncture needle and the care of a wound is lacking. There is only one style of wound care that uses a directly invasive method: surgical wound care.¹⁹ This form of wound care is beyond the specialization that is taught to physical therapists, as it is a general or emergency medicine specialty. According to the reasoning found in the Brief, the inclusion of “debridement and wound care” in the Physical Therapy code shows that there is a good case for also allowing the practice of Acupuncture. This style of logic—that one included technique allows for all similar techniques to also be included—would also allow physical therapists to operate to remove a bullet. Obviously this logic is wrong and dangerous, especially in medical circumstances.

While not as serious an invasive therapy as surgery, the practice of Acupuncture is much more aligned with surgery than with caring for general wounds.²⁰ Once again the Brief is using a

¹⁸ More on this will come in the later section entitled “Overlapping Professions.”

¹⁹ Surgical wound care means the surgical medical care to treat a wound (e.g. gunshot wound), not the care of a post-surgical wound.

²⁰ The ludicrousness of this logic should be easily seen, but in case we have not made our point clear enough we would add one more comment on this topic: even though Acupuncture and surgery have more in common than

disingenuous argument with little relationship to the actual practice of Acupuncture. The Brief uses tangential arguments to try to allow physical therapists to use acupuncture needles.

Compared to the explicit legal definition of acupuncture where the “practice of acupuncture means the insertion of acupuncture needles,” their argument is weak. **We would reiterate that the medical and legal definitions of Physical Therapy have neither explicit nor implicit terminology that would allow them to use invasive therapies like acupuncture.** This, combined with the examples we have given and will continue to give about how exceptions exist to the broad terms of the Physical Therapy licensure code, makes the decision before the Iowa Board of Physical and Occupational Therapy clear. There is no mention of the use of needles, nor any sharp medical device, in the Physical Therapy licensure. The hundred year history and evolution of Physical Therapy has never added, nor tried to add, any of these techniques until the marketing of dry needling (Acupuncture) to physical therapists and the subsequent campaign of the APTA to increase the Physical Therapy scope of practice throughout the United States to include Acupuncture. This marketing and campaigning have nothing to do with proper training and scope of practice of physical therapists and Physical Therapy. They are solely for the inappropriate expansion of a profession’s scope of practice for financial gain.

Acupuncture and general wound care, Acupuncturists would never consider themselves surgeons because, simply put, **they aren’t.**

Attorney General Opinions

The APTA/IPTA Brief attempts to bolster its claim that acupuncture needles are “physical agents” and “mechanical devices” by referring to the Attorney General Opinions from five other states. The Brief does so, ostensibly, because “the opinions from several states involve statutory language similar to that of Iowa Code § 148A.1(1)(b)” and the concepts from these Opinions might then offer insight into Iowa’s situation.²¹

The Maryland Attorney General (AG) Opinion stated in 2010 that health care professionals may overlap, as would be the case of both physical therapists and acupuncturists using acupuncture needles. The AG also argued that the use of “general terms” such as heat, cold, and mechanical device purposefully allows for future development of the practice of Physical Therapy. As we have already stated elsewhere, however, this is misleading and erroneous. **Acupuncture needles are not *mechanical* devices because they are *medical* devices specifically limited to use by qualified practitioners of acupuncture.** This rule exists to maintain safety and efficacy standards. Also, we would once again point out that the Maryland AG’s statement that a “mechanical device” could be “*any tool* designed for the purposes of physical therapy” is unreasonable and wrong.²² There must be limitations, or professions would constantly be crossing the boundaries that mark where one health profession ends and another begins. Specializations in the field of healthcare are purposefully designed to make sure practitioners are properly knowledgeable in their respective fields, and can refer to other professionals who are best suited to a patient’s specific need(s).

²¹ APTA/IPTA Brief.

²² Refer back to our point on endotracheal tubes, page 12.

The North Carolina AG in 2011 made the exact same statement as its Maryland counterpart from the year before, statements from which the Brief took an overly optimistic view.²³ Both statements use **careful, qualitative language** which in no way should be taken as strong statements in favor of their Boards adding dry needling (Acupuncture) to the Physical Therapy scope of practice. Both AGs say “the authority to use acupuncture needles is **not necessarily** reserved exclusively to licensed acupuncturists” (emphasis added). It does, after all, remain within the hands of individual licensure boards to rule on what their licensees can and cannot do. The AGs continue by saying the definition of the scope of a profession must fall “within the statutory **limits**” (emphasis added). As such, while the boards “*may*” determine if dry needling (Acupuncture) falls within the scope of practice of Physical Therapy, the AGs are not saying the boards *should* do this. And just because the boards “*may*” choose a particular course of action doesn’t mean that decision can’t be reversed at a later date, or in a different venue. And they would still have to go through the public process of Rulemaking.

The situation in Washington sheds light on why the AG Opinions have this hesitant or hedging quality about them. The IPTA/APTA Brief prefaced its discussion of the AG Opinions by pointing out how the Physical Therapy Codes in states where the AGs “favored” dry needling (Acupuncture) for physical therapists were similar to Iowa’s Physical Therapy Code. And yet the Washington Physical Therapy Code, RCW 18.74.010, also uses language similar to the Iowa Code. Physical Therapy in Washington means, among other things, “alleviating impairments and

²³ The statement herein referenced appears as follows in both Opinions: “The authority to use acupuncture needles for therapeutic purposes is not necessarily reserved exclusively to licensed acupuncturists or those specifically exempted from the licensing requirements of acupuncturists. State law recognizes that the scope of practice of health care professionals may overlap and confers extensive discretion on licensing boards to define the scope of a profession within statutory limits. In our opinion, the Board of Physical Therapy Examiners [the Physical Therapy Board] may determine that dry needling is within the scope of practice of physical therapy **if it conducts rule-making under the [State] Administrative Procedure Act and adopts rules [a regulation] that relate[s] dry needling to the statutory definition of practice of physical therapy.**” (Any differences are marked in brackets.)

functional limitations in movement by...**physical agents or modalities; mechanical and electrotherapeutic modalities**” (emphasis added). According to the logic included in the Brief, Washington’s Physical Therapy Code’s inclusion of the terms “physical agents” and “mechanical...modalities” should mean physical therapists in Washington are allowed to perform dry needling (Acupuncture.)²⁴ This is hardly the case. In October 2014 the Superior Court of the State of Washington County of King ruled that physical therapists were prohibited from performing dry needling (Acupuncture):

A person that “penetrates the tissues of human beings” with an acupuncture needle or any other needle for the purpose of “dry needling” or any similar act (“dry needling”) is practicing medicine under the statutory definition provided at RCW § 18.71.011(3)... Unless otherwise specifically authorized to practice acupuncture under another professional licensures, [sic] such as a physician or practitioners of East Asian Medicine, a licensed physical therapists [sic] lacks the legal authority to penetrate human tissue with acupuncture needles, or any similar needle, for the purpose of dry needling. Such act constitutes the unauthorized practice of medicine, which is prohibited under Washington statute.²⁵²⁶

Washington’s definition of Physical Therapy includes some of the key words IPTA/APTA argues legitimate the use of acupuncture needles in Physical Therapy (“physical agents,” “mechanical” means), but the court still ruled against physical therapists performing dry needling (Acupuncture).

As such, we would encourage the Iowa Board of POT to discount all of the AG Opinions included in the IPTA/APTA Brief as well as their argument about definitions. The Brief used the

²⁴ While a few state Attorney Generals have issued opinions to guide PT Licensing Boards in allowing dry needling by PTs, it must be noted that the only judicial court rulings related to “dry needling” in Washington and Oregon have both ruled that dry needling is Acupuncture and as such is outside the scope of physical therapists (Washington) and chiropractors (Oregon). As stated in regard to Iowa Attorney General Opinions, “Attorney General Opinion is similar to a legal precedent and stands until a court or later opinion overrules it or new legislation is enacted to change the statute in question.”

²⁵ The court order is available at <http://acupuncture-safety.org/washington-state-court-blocks-physical-therapists-from-dry-needling/>

²⁶ A very similar judicial decision was made in Iowa in 1982 in the Supreme Court ruling in *Iowa Dept. of Public Health v Van Wyk*. We will discuss this further at a later point.

Opinions to reassert the same faulty logic that acupuncture needles are physical agents and mechanical devices and *quid pro quo* part of Physical Therapy; it also tried to imply that the AGs were wholly in favor of dry needling (Acupuncture) as part of a Physical Therapy scope of practice. In reality, the language of the Opinions indicates many of those “in favor” were cautiously reserved, and they emphasized that to legally permit physical therapists to use dry needling (Acupuncture) there must be a **formal public rulemaking** to that effect. Even in Kentucky, where the Physical Therapy practice act specifically allows physical therapists to use invasive techniques, the AG still found that the categories of “physical agents” and “assistive devices” “**may** include needles” (emphasis added). Saying that acupuncture needles *may* be deemed physical agents hardly indicates that the Physical Therapy category of physical agents *should* or *does* include needles. This is a vitally important distinction.

As the Brief evaluates the AG opinions chronologically, it becomes apparent that the state Attorney General legal opinions are moving farther away in the legal arguments that would help dry needling (Acupuncture) be legally in the scope of practice of Iowa physical therapists. As we have successfully argued in relation to Maryland (2010) and North Carolina (2011), the AGs missed the vital legal definition difference between a mechanical device and a medical device. Mississippi (2012) also had an identical argument.

The devolution of the Brief argument continues with Kentucky (2013) where the legal definition of Physical Therapy includes the terms, “**invasive or noninvasive** procedures with emphasis on the skeletal system, neuromuscular and cardiopulmonary function, as it relates to physical therapy” (emphasis added).²⁷ In our opinion, the AG Opinion is still flawed due to all of the definitions of “dry needling” and “Acupuncture” we have used in this Paper. However,

²⁷Kentucky Physical Therapy Code 327.010 Definitions. (2008)

for the purposes of the APTA/IPTA Brief, their argument is moot. Kentucky's Physical Therapy definition is vastly more specialized than the Iowa definition; it is also more restrictive in requiring medical doctor or osteopaths to issue diagnosis for treatment. Louisiana (2015) has similar language to Kentucky, including allowing "medical devices."²⁸ However, this is the only aspect of the AG Opinion that is valid. The sovereignty of the practice of Acupuncture and the fact that "dry needling" is Acupuncture would invalidate the use of acupuncture needles by physical therapists, as they are not exempt from the Acupuncture license act in Iowa.

The Brief's argument loses all its relevancy and in fact shows that as the opinions of the Attorney Generals evolved, the legal right to use acupuncture needles has been removed from the scope of practice of Physical Therapy. The Tennessee AG (2014) concluded:

Although that list is not exclusive, and includes "manual therapy," "physical agents and modalities," and "mechanical and electrotherapeutic modalities," nothing in subdivision -103(15)(B) clearly indicates a legislative intent to include within the practice of physical therapy the invasive use of needles for therapeutic purposes.

"...practice of acupuncture' means the insertion of acupuncture needles and the application of moxibustion to specific areas of the human body based on oriental medical diagnosis as a primary mode of therapy."

...Furthermore, while there are no doubt distinctions to be drawn between the two, dry needling's obvious similarity to acupuncture cannot be ignored, and physical therapists may not perform acupuncture, which is a branch of medicine.

It is obvious that this AG has thought out many of the points as we have in this Paper, and come to the same conclusion. The definition of "mechanical" and "physical agents" neither explicitly nor implicitly refer to acupuncture needles. Acupuncture and Dry Needling are substantially similar due to the use of acupuncture needles and points on the body. Physical therapists are not

²⁸ Remember, as we said on page 13, even if physical therapists can use some medical devices, it does not automatically follow that they can use *all* medical devices, especially those with special controls (like acupuncture needles).

exempt for the Acupuncture Licensure statutes and therefore cannot practice a form of medicine that is reserved for Acupuncturists. The APTA/IPTA Brief tries to twist the scenario in their favor by assuming this legal ban on the use of Acupuncture by physical therapists would change if the PTs were able to convince the legislature to amend the Acupuncture Practice act to include physical therapists. This will not be possible in Iowa. As can be seen by the huge public outcry over the current use of acupuncture needles by physical therapists; the legislature will listen to the public and keep the practice of acupuncture in the hands of extensively trained, nationally certified Licensed Acupuncturists.

Lastly, we will remind the Board that the only two cases of dry needling (Acupuncture) taken to the judicial system have resulted in the removal of dry needling from the scope of practice of chiropractors (Oregon 2015) and physical therapists (Washington 2015). We believe that the previous AG opinions ruling in favor of physical therapists using dry needling (Acupuncture) would be re-evaluated and reversed if presented to those AGs today.

Overlapping Professions

The final argument made in the Brief is that since techniques can overlap between professions, dry needling (Acupuncture) can be utilized by both physical therapists and acupuncturists. This is rather misleading, because it only works so long as dry needling (Acupuncture) is merely a *part* of a profession's therapy rather than the *identity* of a profession. The Brief tries to draw a parallel between therapeutic exercise and dry needling (Acupuncture). They say because Licensed Acupuncturists are not exempt from the Physical Therapy license code, they cannot practice therapeutic exercise. But this statement is clearly false since therapeutic exercise is a Statute-defined adjunctive therapy for acupuncturists, in addition to also being part of the Physical Therapy statute. It is a therapy that is codified in both practice acts, so it can be shared. Therapeutic exercise is also merely one small therapy, used by many health professionals and lay persons. In contrast, dry needling (Acupuncture) is the trademark, identifying, Statute-defined mode of treatment of acupuncturists. Physical therapists cannot claim Acupuncture (non-defined in statute) as part of their possible therapies in the same way acupuncturists can claim therapeutic exercise (defined in statute) as one of theirs. Acupuncture is also a distinct health profession regulated by the Iowa Board of Medicine. As Iowa Code 147.2(1)(a) states,

A person **shall not engage in** the practice of medicine and surgery, podiatry, osteopathic medicine and surgery...**acupuncture**, nursing home administration...**unless the person has obtained a license for that purpose from the board of the profession.**

This means a physical therapist cannot practice Acupuncture, and dry needling is Acupuncture. Thus the final argument in the Brief is invalid, and seeks only to confuse the truth of the situation through misleading comparisons. Furthermore, Physical Therapy is not exempt from the law and license to practice medicine and surgery.

In the Brief's convoluted arguments, the lawyers for the APTA/IPTA make an absurd claim. They misquote—with the purpose to mislead—by omitting the most important word, *exclusively*, in both of the following Iowa Codes:

Iowa Code. The Practice of Medicine and Surgery and Osteopathic Medicine and Surgery

148.2 Persons not engaged in practice.

4. Licensed podiatrists, chiropractors, **physical therapists**, nurses, dentists, optometrists and pharmacists who are *exclusively* engaged in the practice of **their respective** professions. (Emphasis added)

Iowa Chapter 653. Administrative and Regulatory Authority
653-1.1 (17A, 147) Definitions.

"The practice of medicine and surgery" shall mean holding one's self out as being able to **diagnose, treat, operate** or prescribe for any human disease, **pain, injury, deformity** or physical or mental condition and who shall either offer or undertake, by any means or methods, to diagnose, treat, operate or prescribe for any human disease, **pain, injury, deformity** or physical or mental condition. This rule shall not apply to licensed podiatrists, chiropractors, **physical therapists**, nurses, dentists, optometrists, acupuncturists, pharmacists, and other licensed health professionals who are *exclusively* engaged in the practice of **their respective** professions. (Emphasis added)

The definition of "exclusive" is:

1. Excluding or not admitting other things.
2. Restricted or limited to the person, group, or area concerned.

It is omitted once again when they made the case that physical therapists can use Acupuncture because they are listed as exempted in both Practice of Medicine 148.2 and the Administrative Rules 653-1.1 "Definitions."

Why did the lawyers for the IPTA/APTA omit the word "exclusively" from their argument trying to show that licensed acupuncturist might not be legally able to use Acupuncture (a practice of medicine) due to the lack of the words, "licensed acupuncturists," in the

exemptions in 148.2? The truth is extremely important both in legal scope of practice and the ethics behind the argument that physical therapists should be allowed to use acupuncture needles. The use of "exclusively engaged in their respective practices" is a very strong admonition from the legislature to the health profession licensing boards. It directly states that a non-physician medical practice must be "exclusive" to its statutory authority to practice medicine. In other words, they must practice "exclusively" according to the scope written by the legislature into their practice law. While the licensing boards do have the authority to interpret the law and produce rules that regulate the specific aspects to the professions scope of practice, it is the board's legal responsibility to uphold the letter of the law written into the profession's practice law.

While professions can share certain therapies, in *State Iowa Dept. of Health v Van Wyk* 1982 the Iowa Supreme Court decided:

The reason for all laws restricting this and other professions is the protection of the public, and to that end the legislature has seen fit to enact laws and provide means for enforcing the regulations governing the practice of the various forms of the art of healing, permitting each practitioner to follow his profession according to its established principles. Each may have its merits; but those persons who are authorized to practice one form of the art may not encroach upon another form for which they have no authority from the state.

Furthermore, the most important and relevant decision from the *Van Wyk* decision was the admission that:

It seems to us that the use of the appliances [acupuncture needles] or modalities [Acupuncture] in the case at bar does come within the domain of medicine and surgery and would constitute a part of that practice. Therefore, as it constitutes a part of the practice of medicine and surgery, and does not come within the definition of chiropractic, the injunction was properly issued.

This decision was produced from legal proceedings from 1974 to 1982. At that time there were Doctors of Osteopathy and Medical Doctors practicing Acupuncture, some Traditional Acupuncture and some Medical Acupuncture.²⁹ This injunction against a Chiropractor practicing Acupuncture came along with an injunction to stop withdrawing patient blood for diagnostic testing, also found to be the practice of medicine and outside the exclusive scope of chiropractic.

Since that time, citizens of Iowa created and passed two Acupuncture license practice acts, one in 1993 and the last in 2000. Both of these acts explicitly defined Licensed Acupuncturists as utilizing acupuncture needles. The law contains the following exemption:

1. A person otherwise licensed to practice medicine and surgery, osteopathic medicine and surgery, chiropractic, podiatry, or dentistry who is **exclusively engaged** in the practice of the person's profession. (Emphasis added.)

This exclusion is very specific. It was created long after the legal definitions of the practice of Physical Therapy. Had the legislature believed that the practice of Physical Therapy contained the use of acupuncture needles, it would have added Physical Therapy to this exemption.

So we repeat:

1. The use of acupuncture needles is historically, professionally, medically and ethically the practice of Acupuncture. There are no other forms of medicine that arose along with Acupuncture while using solid filiform needles. All use of filiform needles have their basis in the act of Acupuncture.³⁰

²⁹ Medical Acupuncture is a subset of Acupuncture that relies solely on Western biomedicine as the basis for its theory. This would definitely be the definition of "dry needling" if the proponents were correct that it is not "Traditional" Acupuncture. They are not right, but even so the 1982 Iowa Supreme Court ruling applies to all forms of acupuncture.

³⁰ This is not the case with scalpels, sutures, scissors, etc. where many diverse medical traditions and cultures developed these medical appliances/devices.

2. Through the overt acts of the legislature backed by various judicial decisions, "The practice of medicine and surgery is the practice of the healing art, and, unless some restrictions be placed thereon by the legislature, the whole field of medicine and surgery is open to the practitioner."³¹
3. The practice act authorizing Physical Therapy neither explicitly nor implicitly grants the authority to use acupuncture needles or filiform needles, nor to puncture into the body.
4. The practice act explicitly forbids the practice of Physical Therapy "to practice operative surgery or osteopathic or chiropractic manipulation, or to administer or prescribe any drug or medicine included in material medica."³²
5. Any invasive therapy is considered a form of surgery unless specifically and legally defined as otherwise.

Therefore, the use of acupuncture needles to penetrate the body is both explicitly and implicitly forbidden in the practice of Physical Therapy.

³¹ *Iowa Dept. of Public Health v Van Wyk* 1982.

³² Iowa Code 148A.5

Conclusion

To return to the IPTA/APTA's use of *In re estate of Melby*, they emphasized the following from that case: “[the] court construes statutory provisions in ways that **best achieve a statute’s purpose.**” In *In re estate of Melby*, the statute pertained to rights of estate holders versus the rights of health insurance providers to collect reimbursement. But as with the definitions explained earlier, the present context of dry needling (Acupuncture) is fundamentally different from the context in *In re estate of Melby*, meaning the applicable statute is also fundamentally different. The statute under discussion here is the Physical Therapy scope of practice, and the purpose of Scope of Practice is to define “the extent and **limits** of the medical interventions that health care provider may perform”³³ (emphasis added). As found in *Iowa v Van Wyk*, “the reason for all laws restricting [health professionals] is the protection of the public... [and so that] those persons who are not authorized to practice one form of the [medical] art may not encroach upon another form for which they have no authority from the state.”³⁴ **A key part of the purpose of scope of practice is defining the limits**, because it is the limits which offer protection to the public and other medical professionals.

Specific to Iowa’s context, please refer to the following:

Iowa Board of Medicine’s Mission:

“To protect the health and safety of the public through effective licensure and regulation of physician’s and acupuncturists.”

Iowa Department of Public Health’s Mission:

“Promoting and protecting the health of Iowans.”

Iowa Board of Physical and Occupational Therapy:

“The Iowa Board of Physical and Occupational Therapy evaluates the qualifications of applicants for licensure and grants licenses to those who qualify.

³³ Definition of “Scope of Practice” as found in *Taber’s Cyclopedic Medical Dictionary*, 22nd Edition 2013.

³⁴ *Iowa Dept. of Public Health v Van Wyk*.

The Board establishes rules and regulations to ensure the integrity and competence of licensed physical and occupational therapist and investigates complaints for unprofessional conduct.

The Board is the link between the consumer and the licensed physical and occupational therapy and, as such, promotes the public health, welfare and safety.”

These goals are designed to be reinforced by statutes such as scope of practice, and protecting and promoting the health of the public is achieved through “effective licensure and regulation” of health professionals. This means limiting where necessary, and limiting is absolutely necessary when it comes to safely and effectively treating patients with acupuncture needles.

Respectfully submitted,



Date:

10/28/2015

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Recipient: Iowa Board of Athletic Training (Tony Alden, Board Administrator), Iowa Board of Physical and Occupational Therapy, Cynthia Fodor, Carol Hunter, Kathy Bolten, Tony Leys, Editor, Newsroom, and Newsroom

Letter: Greetings,

Stop Dry Needling by Physical Therapists

Name	Location	Date	Comment
Diane Kolmer	West Des Moines, IA	2015-08-28	This type of treatment is very dangerous if not done by nationally certified Licensed Acupuncturists and those trained in the Oriental Medicine. Physical therapists are not trained sufficiently in the subtleties of this work. Untrained physical therapists have performed 'dry needling' and have collapsed their clients lung, or their action resulted in permanent nerve damage. This is very dangerous for the citizens of Iowa. Ignorance by the licensing board does not excuse this type of work being done by unlicensed people. I pay taxes in the state of Iowa for protection from those whose actions can result in personal injury or property damage. I expect to get that from this licensing board. Educate yourselves as to the nature and extent of Licensed Acupuncturists with extensive documented knowledge of Oriental Medicine.
Nancy Jacobson	West Des Moines, IA	2015-08-28	A piece of paper is not Expertise. Another name for a bad practice is not a good practice.
Tania Kac	Des Moines, IA	2015-08-28	I believe acupuncture needs to be done by well-trained practitioners. Acupuncture is more than sticking needles in people.
Kathy Nesteby	Ames, IA	2015-08-29	.
Shelly Teague	Rockwell City, IA	2015-08-29	I go to an acupuncturist, she does an awesome job with me. She is very informative and knows exactly what she's doing. She also has had training for her position. There is room for acupuncturist, just like drs, dentist, etc. Let them do their jobs just like everyone else does. I will continue going to my acupuncturist even if my Dr takes it up.
Katherine Chuapoco	Des Moines, IA	2015-08-29	As a licensed acupuncturist, I believe in the importance of proper education and training for anyone providing care by using an acupuncture needle. Please support this movement to ensure safe acupuncture and to eliminate dry needling in Iowa.
Byong Yi	West Des Moines, IA	2015-08-29	Because I have friends that are highly educated in this field and don't want uneducated persons making them look bad.
Julie Betts	Des Moines, IA	2015-08-29	There is no substitute for working with actual experience of the real acupuncturist.
Ashley Goddard	Bellingham, WA	2015-08-29	Acupuncture is an invasive medical procedure that is outside the scope of practice for Physical Therapists. It takes many, many hours of training to understand how to wield a needle safely, not to mention understanding the underlying mechanisms and theory guiding the practice of acupuncture. Physical Therapists attempting to dry needling are barely amateurs in the art of needling and are a risk to their patients. Visit http://acupuncturesafety.org/ for more information on how the unlicensed practice of acupuncture is being stopped in other states. Good luck, Iowa!
Kathy Anderson	Prole, IA	2015-08-29	It is not in their scope of practice. .why would you let podiatrist operate on you heart...thus is no different
Theresa Sampson	Des Moines, IA	2015-08-29	It is important, for everyone's safety, that Acupuncture only be done by a fully trained and Licensed Acupuncturists.
ROb Giordano	New York, NY	2015-08-30	Dry needling is acupuncture and acupuncture should be performed only by LICENSED ACUPUNCTURISTS!
Angela Fingler	Calgary, Canada	2015-08-30	Most if not all PT's have a very limited understanding of what and how acupuncture works. Their training in it is minimal. It is a disservice to the public to allow undertrained people perform what is essentially substandard acupuncture.

Name	Location	Date	Comment
irene kane	San jose, CA	2015-08-30	Acupuncturists go to school for 4 years (after under-grad). These 3000 plus hours are dedicated to training practitioners how to safely provide Acupuncture and effectively diagnose. Allowing Physical Therapist to do an invasive therapy with a couple hundred hours of training would do the public and grave disservice. Under-training is irresponsible and dangerous. If you research articles on adverse side effects of Acupuncture; you will find it rarely comes from licensed Acupuncturists rather from Chiropractors, P.T. and even MDs who are not properly trained in the modality of Acupuncture.
Tracee Beaumont	Alvin, TX	2015-08-30	This is an issue that os occurring all over the US amd it needs to stop. Under my scope of practice I am not allowed to do PT, MD, RN, or Chiro procedures and frankly I am glad because I have not be trained in them. So why is okay for other to do this with acupuncture. Acupuncture is a complete health system that too me 4 years to learn. I would need a PT license to practice PT so it shoulx be required that all others do the same.
Eloise Albrecht	Tujunga, CA	2015-08-30	I am signing for reasons of public safety. I was trained in a 'dry needling' style in my acupuncture school, and I know it is more complicated than a weekend course.
Diana Beilman	Portland, OR	2015-08-30	Dry needling causes more harm than good. Practitioners are not well trained in this technique which is often invasive and can be detrimental to health when performed by anyone other than a licensed acupuncturist.
Matthew Mann	St. Petersburg, FL	2015-08-30	Physical therapists don't have the proper training to insert needles. They don't know what cnt(clean needle technique) training is. This practice by PT's is a danger to the general public.
Reagan Barry	Houston, TX	2015-08-30	I am signing because dry needling is ashi point needling and is under the licensed acupuncturists scope of practice and should not be done by physical therapists. It is an insult to the five years of graduate scool education I received in acupuncture to allow physical therapists to take a short course and suddenly practice acupuncture but under a different name. Not only is it dangerous, it is ineffective and misleading when practiced in this fashion.
Lavanga Carter	oceanside, CA	2015-08-30	Every time you hear of an acupuncture mishap, It is due to dry needling. Acupuncturists study for 4000-5000 hours, whilst physical therapists do a couple hundred. They are not qualified to practice acupuncture.
Dennis Kaz Kasunic LAc	Portland, OR	2015-08-30	This endangers the public and the publics perception of my medicine, Acupuncture!
Krissy Barritt	Denver, CO	2015-08-30	I am a nurse and acupuncturist and instead of taking an unethical shortcut to poach another profession I went to an accredited program to understand and utilize the full scope. It's a huge safety issue! Why can't we work together for the benefit of the person?
Phillis Hiraga	Ann Arbor, MI	2015-08-30	Training and quality standards of care must be met. Look for a Licensed Acupuncturist to meet these standards to provide proper and safe care.
Kellie Krasovec	Edwards, CO	2015-08-30	I am a fully trained, educated and licensed Acupuncturist, and am frustrated that this amazing medicine is being co-opted. I would never have been ready to insert needles into bodies without thousands of hours of study and internship.
Karin Six	San Diego, CA	2015-08-30	Ruins legitimate acupuncture.
Wagner Mello	New York, NY	2015-08-30	I am signing it because only license and trained acupuncturists are able to use acupuncture needles to treat.

Name	Location	Date	Comment
Laura Coleson-Schreur	Towson, MD	2015-08-31	As an acupuncturist I am concerned with the safety and limited educational training that Physical Therapists are receiving before using this invasive procedure. Acupuncture is a many thousand year old tradition that is far more than sticking needles where it hurts or where a muscle is tight. This practice devalues this long tradition of treating the root cause of problems not just putting a bandaid on it.
erica easter	casselberry, FL	2015-08-31	I DO NOT support dry needling by improperly trained PTs.
Amy Mager	Springfield, MA	2015-08-31	There is a reason acupuncturists attend school for four years and need to pass a National exam to practice. There are many techniques within acupuncture. Dry Needling is an effective one and all who want to practice it need to be licensed as acupuncturists. Please protect patients and have clear standards for the use and practice using filiform/acupuncture/dry needles. Changing the name while putting an acupuncture needle into an ahshi acupuncture point does not change the fact that it's acupuncture and needs to be licensed and practiced as such. Amy Mager MS, LicAc
Grace Minnella	Maywood, NJ	2015-08-31	Please do not let an inexperienced physical therapist cause damage to patients by using the so called "dry needling". If anyone pierces a skin with a needle, it's Acupuncture, plain and simple. That person needs a master's degree in acupuncture. Too many people have been injured by people claiming to know what they were doing.
Sandra Wilkes	Stilwell, KS	2015-08-31	Physical Therapists are well trained in Physical therapy modalities, but not well-trained in needling.
Carola Stepper	Hood River, OR	2015-08-31	I am a Licensed Acupuncturist and have a Master's degree and once you read this article you may understand better why I signed this petition: http://www.liveoakacupuncture.com/dry-needling
Aimee Bonneval	Portland, OR	2015-08-31	I'm signing because I am a licensed acupuncturist, who spent 4+ years, full time, studying CHINESE MEDICINE. There are theory and techniques that licensed acupuncturists spend years learning and the practice of dry needling not only dismisses our learning, but also potentially makes needling dangerous, as it is practiced by those who do not take the time to learn it properly.
Jason Bussell	chicago, IL	2015-08-31	The WHO standard for training in acupuncture is 2000 hours. The US standard is 3000 hours. MD's who want to learn acupuncture must take a 500 hour course. These PT's change the name and assert competence in as little as 27 hours. This is dangerous to the public and is the exact reason why we require such stringent training and oversight of anyone who is legally allowed to practice acupuncture.
Gregory Boyle, L.Ac, Dipl Ac NCCAOM,	Leawood, KS	2015-08-31	I wrote the law for licensing in Missouri, and it is appalling to me that anyone would consider using this highly technical procedure with so little training and supervision. "If you don't know where you're going, don't do it" ?! If you had proper training, you'd know where you were going! SHAME! SHAME! SHAME!
Katherine MacKenzie	South Glens Falls, NY	2015-08-31	It's dangerous to allow this! PTs who want to do dry needling should go to acupuncture school where it is taught extensively.
Lesley Hamilton	Austin, United States Minor Outlying Islands	2015-08-31	Acupuncturists are the most qualified and trained to do dry needling - which is merely acupuncture by another name. Public safety is at risk if dry needling is allowed by untrained, poorly trained, or under-trained physical therapists, chiropractors and others.

Name	Location	Date	Comment
Susan Pundzak	Des Moines, IA	2015-09-04	Only fully trained acupuncturists can safely treat using TCM principles and practices.
Joshua Singer	Montpelier, VT	2015-09-04	The acupuncturists in Vermont have the same concern and action happening.
Twila Rankin	Knoxville, IA	2015-09-04	I think only Graduate Degree Licensed Acupuncturists should do acupuncture. No one but a licensed Acupuncturist will ever touch me, I have the greatest.!
Jenna Anthofer	Carroll, IA	2015-09-04	Acupuncture and dry needling requires extensive extra training. More than can be learned in a weekend seminar. Practitioners need proper training.
John Emanoil	Clive, IA	2015-09-04	I support this petition. Physical Therapists are undertrained to be practicing Dry Needling (Acupuncture). This is a dangerous precedent.
Emily Hurm	Altoona, IA	2015-09-04	Patient safety.
Mari Schultes	Coon Rapids, IA	2015-09-04	It is time to make sure trained and licensed acupuncturists are the only professionals to use acupuncture on clients.
Donna McAdams	Escondido, CA	2015-09-04	Acupuncturists are trained to know how to use needles. 3000 hours!
Sara Pamela Star	Mount Vernon, IA	2015-09-04	I am Licensed Acupuncturist, practicing in Iowa.
heather falkenbury	bellingham, WA	2015-09-04	I am a licensed acupuncturist in WA state, and believe acupuncture should only be performed by licensed acupuncturist with proper training. "Dry needling" is unsafe.
Rayna Stengel	Hollywood, FL	2015-09-04	I'm an acupuncturist, and I want to remain one.
Alan Genitempo	Nutley, NJ	2015-09-05	I am an acupuncture student in Manhattan who will eventually practice in NJ. I want to see an end to this as I believe it threatens the integrity of are practice, at the state and without doubt the federal level.
Jamie Szybala	Tucson, AZ	2015-09-05	Dry Needling is unsafe and untrained acupuncture. It puts the public in danger.
Bree Dellerson	Redmond, WA	2015-09-05	I am an acupuncturist and understand the dangers of those not properly trained needling people. It diminishes our ability to provide proper care when people go to untrained therapists using needles and causing injury. It also circumvents our years and thousands of hours of training to receive a Masters of Science degree, as others co-opt our modality to incorporate it into their treatments without any understanding of what it is they are doing. It is equivalent to us taking a weekend course and being able to do chiropractic adjustments, or treating as if we were medical doctors. This is a public safety issue.
Ginger Nguyen	Redmond, WA	2015-09-05	I want PTs to have proper training before practicing acupuncture
Catherine Zwergel	Evanston, IL	2015-09-05	Dry needling by those who are not trained properly as licensed acupuncturists, poses a threat to patients well-being.
Kimberly Shotz	portland, OR	2015-09-05	I am a state board licensed acupuncturist and nurse practitioner. I have completed 6 years of graduate schooling for this, 4 for acupuncture md herbal medicine. This level of preparation protects my patients. Anyone practicing any form of acupuncture should have this level of prep for patient safety and safety and integrity of my profession .
Jasmine Patel	Lake Oswego, OR	2015-09-05	It is a public health hazard to have PT's doing "dry needling". Patients will be at risk for pneumothorax, internal organs being punctured and severe hematomas. Please keep acupuncture in the scope of properly trained acupuncturists for public safety and for the validity of the Chinese medicine.
Christina Van Norman	Damascus, MD	2015-09-05	I am signing because dry needling is acupuncture done by amateurs who are dangerous to their patients

Name	Location	Date	Comment
Gayla Woodenlegs	Ferndale, WA	2015-09-05	I'm signing because regardless of the abilities of PTs, MDs, DCs, unless they have been fully trained as an Acupuncturist, they should not be doing dry needling. There are a number of ways they can cause harm. For example, there are points that can cause miscarriage in a pregnant woman. Acupuncturists train for several years. Should we be allowed to take a few classes and then do adjustments, prescribe drugs or perform simple surgeries?
Gina chapman	Australia	2015-09-05	im signing this because I believe that dry needling is dangerous. A short course is not long enough to understand the consequences of your actions.
Adolfo Lopez	Riverside, CA	2015-09-05	Dry needle/acupuncture practiced by a practitioner without the proper education is a public health hazard.
Nicole Rieks	Bothell, WA	2015-09-05	Need to protect patients and Acupunture profession.
Maya Kron	New York, NY	2015-09-05	We should all practice within our own scope of practice. Dry needling can be very harmful to the patient. It takes years to become an acupuncturist. Needling should only be done by licensed acupuncturists
Amy Guinther	Madison, WI	2015-09-05	Dry needling is essentially acupuncture into trigger points and to ensure safety to the public, PT's should be required to obtain the equivalent training that acupuncturists receive. Especially when needles are placed in dangerous places such as over the lungs.
Greg Carroll	Denver, CO	2015-09-05	PTs should not be using acupuncture needles.
jeanie mossa	salem, MA	2015-09-05	I am a licensed acupuncturist who knows that it takes more than a few weekends to learn how to properly needle and diagnose patients.
Kathy Yocum	Edison, NJ	2015-09-05	I am a Licensed Acupuncturist in Ny.
rebecca blankenship	Yorktown, VA	2015-09-05	I believe that procedure should be done by a licensed acupuncturist .
Heather Usry	Pompano Beach, FL	2015-09-05	I am an acupuncturist we learn how to properly use the techniques. People's lives are in danger and this needs to stop if you havent had the proper training and experience.
Liz Miller	Fort Madison, IA	2015-09-05	I receive acupuncture regularly and I am horrified that others could do this with so little training.
Janet Holmes	Algona, IA	2015-09-05	This is not right and dangerous.
Mark Nollf	Weddington, NC	2015-09-05	I am a licensed acupuncturist with over 3200 hours of education and training 800 of them being an internship and passed 4 board examinations. I believe needling patients requires this type of rigorous training and testing to provide patients with a safe, effective treatment.
Janet Lee	San Diego, CA	2015-09-05	I believe practitioners who practice dry needling have insufficient training and are endangering the public.
Scott Nause	Newton, NJ	2015-09-05	I am a licensed acupuncturist that went to acupuncture school for 4 years to learn the proper way to do Chinese Medicine and you can't let physical therapists do acupuncture/Dry needling with a few weekend courses and without being licensed. This is not safe. This is detrimental to the patient as well as our acupuncture profession. If they want to do dry needling/acupuncture they should go to Acupuncture school and get licensed just like us. Would you allow us to do physical therapy with a couple weekend courses??
Kerry Kott	Tampa, FL	2015-09-05	I'm signing because properly trained professionals should be performing this type of needling.

Name	Location	Date	Comment
Kerry Morton	Beaverton, OR	2015-09-09	I am signing this petition because I am a Licensed Acupuncturist in Oregon who has had thousands of hours of education for my masters and just completed my doctorate, so 6 years of education total and two trips to study in China. I do not think that the training for dry needling is sufficient and it is very dangerous and unethical to give a green light to such a minimally trained person. If I were to attend a weekend seminar to learn adjustments or even minor surgery, that would be seen as very subpar training to the point of endangering the safety of patients. Isn't this the root of the argument? Patient safety? Thank you.
Brooke Kruger	Ames, IA	2015-09-10	I think all health care professionals should be licensed.
Christey Sharpshair	Marshalltown, IA	2015-09-11	I'm possessive of my profession, and I've had extensive training to avoid unfortunate situations and unsafe practices. Acupuncture should be done by acupuncturists, not PTs. We can work together but should not overstep our bounds.
P Spors	ANKENY, IA	2015-09-12	I believe Dry Needling should not be allowed . Professional Acupuncturist have proper education, training and supervision and Are licensed. Unprofessional use of Dry needling poses certain health risks, one being Hepatitis C if needles are not clean.. Acupuncture must be limited to those that have the proper Education and Licenses.
Teri Petrzalek	Cedar Rapids, IA	2015-09-14	i think all acupuncturists need training, testing, and licensing.
Wayne Mullen	Waukee, IA	2015-09-14	Unsafe practice
Sara Bublitz	Rochester, MN	2015-09-15	The training for PTs to practice dry needling is ridiculous and dangerous for patients. It puts people at risk. If patients need "dry needling" or "acupuncture" they should go to a licensed acupuncturist or medical physician. Dry needling should be made illegal for PTs since it is NOT within their scope of practice.
Carol Whitmire	Alexandria, VA	2015-09-15	I'm a PT and LAc-- not wanting my PT colleagues to practice an ignorant, coarse form of acupuncture. They have ultrasound and the use of their hands etc as modalities. Dry needling just brings more reimbursement and that's out of integrity
Sarah Towers	North Charleston, SC	2015-09-16	Dry needling is ridiculous
Stephanie Emond	Montréal, Canada	2015-09-16	I am an acupuncturist from Canada and I am very concerned about the safety issue in US, therapist cannot acquire the hability to use an acupuncture needle after a weekend training. This is just common sense. The physiotherapists, themselves, should be alerted by this fact. Do they feel confident enough to practice on patients after 1 weekend, I think not!!! They then use, patients as guinea pigs! In our acupuncture training, we start be practising on ourselves, then other colleagues, then supervised training for 1 year, then we treat in our clinics!!!
Roger Berger	Humboldt, IA	2015-09-25	Because I currently receive Acupuncture treatments from a Certified Practitioner and firmly believe that proper training and certification is vital to perform Acupuncture Techniques in a proper , safe, and beneficial manner to achieve patient benefit.
Catherine Ruma	Arlington, MA	2015-09-30	I'm signing because this is out of pts scope of practice. It's very dangerous as well.

Name	Location	Date	Comment
Rita Striegel	Coralville, IA	2015-10-20	<p>My daughter attended a 4 year accredited acupuncture college to obtain her degree and then took state and national boards to become a licensed acupuncturist. She currently has a private practice in a California PT clinic where she works closely with the PT's who acknowledge the benefit of acupuncture and refer patients to her for treatment.</p> <p>In comparison, I recently had surgery (in Iowa) that required followup physical therapy and my PT told me that he was taking "a few weekend classes to get certified in dry needling" and how excited he was to get started right away. He was a wonderful PT and I would go back to him in a heartbeat for any PT needed, but I would never let him dry needle me. I know the difference and "a few weekend hours of needle training" is not only dangerous, but appalling.</p> <p>If a PT feels so strongly that "needling" would be beneficial for their patient, then they should refer them to an acupuncturist, who has the extensive background and training to treat appropriately.</p> <p>Thank you for reviewing this situation so the patient's health and well-being is protected.</p>
Keith Kennedy	Phoenix, AZ	2015-10-20	Emily is my friend
Deborah Skelton	Louisville, CO	2015-10-20	I spent almost 2,000 hours training to be a REAL acupuncturist. This awful practice by poorly trained "professionals" needs to stop. They have no idea what they are doing and are even trying to get it referred to as acupuncture in many states. Patients I have seen after they have received this dry needling treatment have been the true witnesses when they tell me that what I do for them is far better than what they received from their PT.
Emily Tanko	Ankeny, IA	2015-10-20	i believe in patient safety and adequate training.
THOMAS WHEELLOCK	Coralville, IA	2015-10-20	PT's and AT's should be required to take the same training and be licensed the same as LA's.
Kenn Bowen	Winterset, IA	2015-10-21	I believe more than a weekend session of training is necessary. All practitioners of the Chinese Arts and Medicine should be done by highly trained, nationally certified professional Licensed Acupuncturists.
amy richard	Gainesville, FL	2015-10-21	I'm signing this because I have personally experienced a serious staph infection from a dry needling practitioner who was not properly trained in acupuncture. Fortunately, I've also benefited greatly from treatment by fully trained, licensed acupuncturists. This type of alternative medicine has made a major difference in my health and well being.
Eileen Flsher	Coralville, IA	2015-10-21	I am a physician and am totally opposed to someone providing health care treatment without the stipulated amount of training. Individuals receiving dry needling by someone without the appropriate training are subject to an increased rate of side effects such as pain, infection, and bleeding which are exceedingly rare when treatments are done by a licensed, trained professional acupuncturist.
Carol Wick	Tiffin, IA	2015-10-21	Use of acupuncture needles needs appropriate training and oversight. Please protect the public from dry-needling practices that are not well trained.
Rebecca Reumers	Jackson, WY	2015-10-21	I want to help protect the public.
Barbara DeGroot	Iowa City, IA	2015-10-22	Safety
Jill Lomp	Collins, IA	2015-10-22	I think 24 hours is outrageous to be considered a professional at acupuncture and I would be instantly upset if to find out someone is doing this practice with so little training.

Name	Location	Date	Comment
Paula Bruno	Austin, TX	2015-10-24	I am in training--four and a half years of training, mind you--to become a licensed acupuncturist.
Rawls Whittlesey	Tyrone, GA	2015-10-24	The reason Acupuncture is regulated is because advanced training is required to perform it safely. PTs should be held to the same regulations.
Kathleen Behrems	Madison, WI	2015-10-24	It's about safety, yes, but also recognize that acupuncture is meant to be just part of an entire system of medicine. It is not just a technique.
Lois Santi	Des Moines, IA	2015-10-24	We need to be safe.
Mary Rodarte	rockford, IL	2015-10-24	It's wrong , they don't have the correct knowledge and are causing more damage to the patient
Anna Burchers	Seattle, WA	2015-10-24	I am signing because dry needling therapists do not have the training to qualify them to needle safely and effectively. It takes away from the years of training qualified Acupuncturists must go through in order to carry out these techniques!
jane nelson-easterbrook	West Des Moines, IA	2015-10-24	I believe only acupuncture should be performed by a certified trained licensed doctor of acupuncture. No one else.
Tamara Dabney	White River Junction, VT	2015-10-24	Acupuncture — when practiced by actual trained professionals — is a wondrous modality. It should NOT be practiced by individuals who really don't know anything about it, certainly those that don't understand basic sterile/hygenic practices!!
Yoolee Kwon	Austin, TX	2015-10-24	It's is dangerous for someone who had gotten just 24 hours of training to handle needles. Acupuncturist put in thousands of hours of training!
Deena Drewes	maplewood, MN	2015-10-24	I am a fully-trained, LICENSED Acupuncturist and what PT's are doing here is fraudulent medical practice.
leah petts	Austin, TX	2015-10-24	Leave the acupuncture to the students who train for 4 years to learn how to needle people. We should respect one another's professions.
Tricia Beretz	Cambridge, MA	2015-10-24	Dry Needling is acupuncture without the proper training, and people are getting hurt
Sylvia Salcedo Rojas	Denver, CO	2015-10-24	There is not enough training for PT this is acupuncture
Jason Bussell	Chicago, IL	2015-10-24	The US government requires supervised training JUST IN needle practice before a Licensed Acupuncturist is considered safe to insert needles. This is independent of the many hundred hours of theory, hundreds of hours of class instruction in point location, and hundreds of hours in needling technique. We can argue all we want about how necessary the theory is (it makes treatment far more effective), but no other profession is allowed to perform invasive techniques with so little training and supervision required. It is not safe.
Lindsay Long	Falcon Heights, MN	2015-10-24	Dry needlers are hurting my patients.
Tanya Hartz	Airdrie, Canada	2015-10-24	I'm signing because I'm an acupuncturist and Dr of TCM here in Canada and feel physiotherapists, chiropractors, naturopaths, massage therapists, and medical Dr's should not be permitted to practice acupuncture techniques unless they go to College for 3-5 years. This is why mistakes happen and it's a mockery to our profession.
Lisa Cavaliere	Encinitas, CA	2015-10-24	this is so awful to expose people to this inexperience! How can this be legal! I spent 5 years in Chinese medicine school and over 200,000 dollars in financial aid to learn this skill! A weekend course does not even compare!
Phranque Wright	Chicago, IL	2015-10-25	Dry needling is a form of acupuncture which should be used by Licensed practitioners of that medicine, not by online courses or weekend seminars.
Kathy Love	West Des Moines, IA	2015-10-25	Only licensed acupuncturists with appropriate training should be permitted to use needles for healing. There is too much room for damage and misrepresentation if this is not the case.

Name	Location	Date	Comment
Jessica Maynard	Portland, OR	2015-10-26	I am an acupuncturist, and desire to see 'dry needling' stopped.
Stephanie Young	San Diego, CA	2015-10-26	I am an acupuncturist in San Diego, CA and a chiropractor in my area alot killed a patient because he was performing acupuncture on her without proper training or licensing. The patient trusted him, assuming he was a health professional and he was properly trained to treat her, and he was not!
Elaina Ellis	Bellingham, WA	2015-10-26	I believe acupuncturists provide an incredible medical benefit to those who need care, and are able to do so after several years of rigorous schooling studying this branch of medicine. It scares me to know that PTs and trainers are using acupuncture needles with almost no training. It's dangerous and it belittles a medical practice that is thousands of years old and scientifically proven to work when administered by Licensed Acupuncturists.
Ruth Lehmann	Kenosha, WI	2015-10-26	I'm signing because it matters.
Leah Eichmiller	Saint Paul, MN	2015-10-26	This needs to stop! People are getting hurt unnecessarily!
Aaron Schindler	Minneapolis, MN	2015-10-26	I believe Dry Needling is a public safety issue and puts consumers at high risk at the hands of poorly skilled Providers like physical therapists and athletic instructors! This is a public safety issue!
debbie corrente	Alameda, CA	2015-10-26	Help us protect the safety of the public by making sure people using acupuncture needles are properly trained experts in acupuncture. It should only be practiced by highly trained, nationally certified professional Licensed Acupuncturists.
Kimberly Saul	Buford, GA	2015-10-26	Dry needling is acupuncture and requires an acupuncture license to practice it.
Marino Moutafis	West Bloomfield Township, MI	2015-10-26	I am an acupuncturist and herbalist in MI. I have practiced in both hospital and research settings. Training for Dry Needling for PT is inadequate and the risks to injure patients is very high.
Kathi Sowada	Becker, MN	2015-10-26	Acupuncturist
Michelle Kitsmiller	South Saint Paul, MN	2015-10-26	As an acupuncturist I completely agree that dry needling is just a way to get around acupuncture training, which makes it a disservice to the recipient.
Amy Schroeder	Minneapolis, MN	2015-10-26	This has to stop!!
Autum Kirgan L.Ac	Asheville, NC	2015-10-26	This is a NATIONAL Public Safety Issue. We are seeing other professionals, especially PT's using needles unsafely and potentially causing patients great harm. This modality of use of needles is not being regulated for cleanliness, safety and quality education.
Valerie Overby	St Paul, MN	2015-10-26	I'm a licensed ACUPUNCTURIST - I didn't go to grad school for 4 years - take 4 board exams - to have another profession scope creep into our scope of practice - if you want to do acupuncture, get licensed and board approved (period!).
Pat Bowen	Iowa city, IA	2015-10-26	Keep acupuncture done by licensed acupuncturists, not someone that can perform this procedure with a short weekend course! This is crazy! Hair dressers need more training than what you are allowing.
Jordan Mack	Maple Grove, MN	2015-10-27	Acupuncturists must be trained to a high standard to achieve standards required to be a registered acupuncturist.
David Lee	Thousand Oaks, CA	2015-10-27	dry needling is acupuncture invented during the Stone Age. There is no need to rebrand it to circumvent the existing acupuncture law, which applies to dry needling equally.
Leslie Bower	Seattle, WA	2015-10-27	I believe needling is a skill that belongs to acupuncturists.
Obbie Harvieux	North Las Vegas, NV	2015-10-27	Stop these procedures
Frederic Bonnard	Boulder, CO	2015-10-28	I know acupuncture and get great results. I agree with your position

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Recipient: Iowa State Senate, Iowa State House, State Rep. Linda Miller, State Rep. Marti Anderson, and State Rep. Rob Taylor

Letter: Greetings,

Protect the Public - Only Licensed Acupuncturists should be allowed to use Acupuncture needles.

Name	Location	Date	Comment
Iowa Acupuncture	Clive, IA	2015-02-08	As two of the original Licensed Acupuncturists practicing 18 years in Iowa, we have seen the need for the proper training for acupuncturists. Unfortunately, we often see a person who has almost given up hope on acupuncture because their poorly trained Doctor or Chiropractor has failed to help them. Medicine is a very complicated science and art. Without proper training patients are injured or left with a curable disease. We hope this petition will help Iowa remove the exemption that allows Doctors and Chiropractors to practice acupuncture with little to no training. Our patients deserve competent medical professionals.
dave S	Hugo, MN	2015-02-08	I agree.
Jim Loos	Grimes, IA	2015-02-08	Control of practitioners is the only guarantee they are qualified.
Malina Chin	Lincolnshire, IL	2015-02-08	Public safety depends on well educated practitioners. Don't let someone get hurt by someone with a weekend class.
Patrick Pieczynski	Davenport, IA	2015-02-08	I agree with the petition
Jennifer Williams	Southern Pines, NC	2015-02-08	Too many unformed consumers are being injured or paying premium fees for substandard training. Public safety and ethics
Gretchen Rivas	Wilmington, NC	2015-02-08	I am an acupuncturist with 4 years of acupuncture education and training and I believe everyone should have to have the same to practice.
Maureen Bailey	Iowa City, IA	2015-02-08	It is very important to have the required training and testing before using this incredible technique.
Mona Robbins	Saint Paul, MN	2015-02-08	Acupuncture should only be performed by MAOM and licensed acupuncturists.
Tammy Lehman	Altoona, IA	2015-02-08	Acupuncture needs to be done by licensed people only
Jason Bussell	Chicago, IL	2015-02-08	The WHO standard for acupuncture training is 2000 hours. In the USA, our standard is 3000 hours. MD's and DC's do not have training in this field of medicine and should not be allowed to practice it without reaching the standard of training that all others are required to reach.
Carolyn Walker	Urbandale, IA	2015-02-08	Seems reasonable. A licensed MD/Internist I know spent 300+hours/trips to Berkeley to become certified...included hands on...seems like they required a lot of him at the time.
Dan O'Neill	Portland, OR	2015-02-08	Acupuncture will prove to be a cost effective tool for public health. This bill helps to maintain the safety and standards of those practicing this practical and effective medicine.
Mona Lee Yuan, L.Ac.,OM	Oceanside, NY	2015-02-08	I'm a L.Ac, OM in NYS ANDY a licensed PT. As acupuncturist and a PT I feel PT's are not qualified to do dry needling. They should stay in the realm of their practice.
Mary Catherine Benedetto	Aiken, SC	2015-02-08	it is important to maintain the strengths and integrity of this unique and powerful form of medicine.
Kristi Vanderstock	San Diego, CA	2015-02-08	Please hold all practitioners of acupuncture to the national standards. Practitioners who are properly trained post the greatest benefit to public safety.
Lora Fraracci	Des Moines, IA	2015-02-08	It makes sense!
Jason Stillwell	Davenport, IA	2015-02-08	im a firm believer in the bennifits of acupuncture. It has helped me tremendously.
Marcy L'Hommedieu	Savannah, GA	2015-02-08	I am signing this because I grew up in Hartley, Iowa. I would like the citizens of Iowa to always be treated with the utmost education, which means that weekend acupuncture courses do not provide the education to treat someone with acupuncture. Find an acupuncturist that has been trained at an accredited acupuncture school and has passed NCCAOM exams.

Name	Location	Date	Comment
Adolfo Lopez	Riverside, CA	2015-02-08	I'm signing because allowing practitioners to perform acupuncture without the necessary training and licensing is a public health neglect. For example, in San Diego, California, last month a chiropractor caused a pneumothorax on a patient when he gave her an acupuncture treatment. The chiropractor is not in compliance with state laws and regulations, that require chiropractors to obtain an acupuncture license in order to practice acupuncture. To obtain a license, chiropractors need to fulfill the education and clinical internship required by the California Acupuncture Board to be able to sit for examination. If cases like that take place on a state with clear laws and regulations, what can we expect to happen if health care practitioners are allowed to practice acupuncture without proper training and license?
Daniel Tague	Philadelphia, PA	2015-02-08	I'm an acupuncturist, and this is an important issue. The proper training should still be required, as accidents caused by improperly trained people affect the entire profession. It doesn't matter if you are highly skilled in other areas of the medical arts. Improperly trained doctors are still puncturing patients' lungs, due to a lack of proper needle depth because they did not have adequate training.
Theresa Sampson	Des Moines, IA	2015-02-08	You would not go to a Podiatrist to have a tooth pulled...so why should you go to anyone calling themselves an Acupuncturist if they are not fully licensed as an Acupuncturist?
Shana Grams	Little Falls, MN	2015-02-09	I'm a licensed acupuncturist that strongly agrees you must have a degree and license in acupuncture in order to practice acupuncture.
Kellie Krasovec	Edwards, CO	2015-02-09	I am a Licensed Acupuncturist in Colorado, and strongly oppose the use of acupuncture needles by anyone not fully educated and licensed in Chinese Medical theory.
Jennifer Vangalder	St. Petersburg, FL	2015-02-09	As an acupuncture student, I will always support my profession to withhold a recognition and understanding of our professional education to the public.
Amy Gulling	Urbandale, IA	2015-02-09	I am a teacher. I went to 4 years of school to be a teacher. I would want my children to have a teacher that is educated and has passed all the necessary credentials. Same is true for acupuncture. Chiropractors and Doctors need to have the hours of class work and training before they can perform acupuncture on patients.
Sarah Zanolini	Alhambra, CA	2015-02-09	I am shocked that the current situation in Iowa allows people with minimal (100 hour) training in Acupuncture to practice, as it is precisely these individuals whom are most likely to cause negative side effects of Acupuncture such as pneumothorax. Requiring proper licensure for the practice of acupuncture (through the NCCAOM standard) helps ensure patient safety and professional integrity.
Emily Hurm	Altoona, IA	2015-02-09	It's extremely important to ensure our medical professionals have the appropriate training for their profession.
Georgia Carr	Denver, CO	2015-02-09	Acupuncturists have rights!
honami watanabe	Vancouver, Canada	2015-02-09	I think most of the public don't know about this reality which is very manipulative. Acupuncture is what they do and what TCM Acupuncture is 100% different in effectiveness. Because TCM acupuncture treats with people, not the symptoms.
susan kimpton	Pueblo, CO	2015-02-09	I have been legally practicing Acupuncture in three states for over 20 years and none of the states that I'm licensed in has required a MD. or Chiropractor to either refer or monitor me! Please do not stand in the way of Acupuncturists in Iowa!

Name	Location	Date	Comment
Bridget Puchalsky	Santa Cruz, CA	2015-02-09	I believe that those practicing acupuncture should be fully trained in 3-4 year educational programs that both support the patients and support the medicine. I believe that all states should have regulations on the practice as in California.
Alexander Kremer	Makawao, HI	2015-02-09	It's the right thing to do. Please pass this bill
Camille Pascoe	Minneapolis, MN	2015-02-09	I will be graduating with well over 2,000 hours of training. Let's raise the standard. Patient safety comes first.
Elizabeth Williams	San Dimas, CA	2015-02-09	As an acupuncturist and native Iowan, I wholeheartedly support this important amendment. Nothing should ever compromise patient safety and quality of care.
Emma Broderick	Saint Paul, MN	2015-02-09	I want the best for patients experience and I think that can only be accomplished with the proper TCM training.
Ker Chang	Minneapolis, MN	2015-02-09	I support acupuncture and safety for everyone.
Jodi Peltier	Inver Grove Heights, MN	2015-02-09	With a minimum of 6 years of formal higher education (many have 8 years), acupuncturists are taught and are completely capable of diagnosing a condition (in TCM) and treating it with an array of cost-effective methods that far outweigh any other professional attempting to practice this medicine. Many are also taught a balanced [integrative/western] curriculum to be able to refer patients out to the appropriate medical provider outside their scope of practice. Bottom line: As a mid-level medical provider, acupuncturists should be the only ones performing acupuncture.
Wendy Middleton	Slade, KY	2015-02-09	I am an acupuncturist and I care about the integrity of the profession and the well being of the public.
Chelsea Badders	Denver, CO	2015-02-09	I am an acupuncturist practicing in colorado
Eloise Albrecht	Tujunga, CA	2015-02-09	I respect education, and these are the people specifically educated to do this.
Cassandra Hyatt	Ankeny, IA	2015-02-09	I want my Acupuncturist to have maximum training, as now required by state law.
Cassie Krause	Andover, MN	2015-02-09	im currently getting my Masters in Acupuncture & oriental herbal medicine. A Chiro or MD with an acupuncture "license" is ridiculous & they can't Possibly understand the detail and purpose in the same way as a traditional Chinese Medical practitioner does. Not possible.
Patrick Yoerger	Iowa City, IA	2015-02-09	I believe that only practitioners who have had extensive training and adequate clinical supervision with acupuncture can safely and effectively use acupuncture needles.
Leewai Chang	Minneapolis, MN	2015-02-09	I SUPPORT!!!
Darlene Zwolinski	Greenwood Village, CO	2015-02-09	I'm signing because I am about to graduate with a degree in Acupuncture. With all we've learned, I cannot imagine doing this practice with only 100 hours of training. Having PT's, MD's and chiropractors needling takes down the power of what acupuncture can truly do. Without the knowledge of the theory of why and where you needle degrades the whole profession. Please pass this bill.
Andrea Beth Damsky	La Mesa, CA	2015-02-09	I am an acupuncturist and this affects public safety, as well as my profession and livelihood.
ngoc nguyen	Sioux City, IA	2015-02-09	Let the devoted and trained professional do their job ethically. I am supporting this amendment.
Cindi Poppe	Bellevue, NE	2015-02-09	I am an acupuncture student & wouldnt dream it'd be possible to claim to do Chiropractic treatments or Physical Therapy with 100 hrs of training.

Name	Location	Date	Comment
John Weeks	Rushden, United Kingdom	2015-02-09	Acupuncturists are expertly trained and experienced and therefore should be acknowledged and allowed to legitimately practice as Acupuncturists. All other practitioners should obtain the same qualification and training to practice Acupuncture.
Patrick Boltinghouse	Des Moines, IA	2015-02-09	<p>First off you need 360 hours of training to become a tattoo artists ... There is 0 hours in acupuncture training needed to add this practice to any menu of alternative health services ...</p> <p>Alternative medicine that can severely alter one's physical health should have a National Standard. These standards when met should also give more privileges to those willing to adhere to such quality standards.</p> <p>It is Odd that someone is able to puncture the skin with a sharp object to leave a lasting picture on the body and needs over 300 hours in understanding that particular art form ... BUT ... One doesn't need any detailed training hours to stick a needle in you to effect your personal health ...</p> <p>Like all forms of Health Care there is a National standard, and if Acupuncturists are claiming to help with personal health, Like Physical Therapists, Doctors, even Yoga instructors there is a level that should standard ... 100 hours is nothing compared to what Tattoo artists already have to do ...</p> <p>Who knows with national standard recognition acupuncturists may have more options to include more insurers leading to more clients ...</p>
Maranda Whirry	River Falls, WI	2015-02-09	I am signing because I am currently an acupuncture student and am spending a lot of time and money to master the art of acupuncture. In the healthcare profession we have many of us who specialize in different areas and require appropriate education and training to give the patient the best care that we can offer. Let the acupuncturists do what they know best and are trained to do!
Julia Wolfe	Panora, IA	2015-02-09	<p>I've gone to acupuncturists trained in traditional Oriental Medicine. My mother went to a chiropractor who had a class in acupuncture twice. There is no comparison between the education. In fact, my Mother had a pacemaker and she came home from her sessions very tired and feeling ill. The chiropractor placed electronic devices on the needles and was sending electricity through her body that interfered with the pacemaker's working. This was dangerous.</p> <p>There must be another designation for these practitioners. To be quality acupuncturists, people need to master the 5 Elements and Chinese Herbs.</p>
Megan Hietala	Excelsior, MN	2015-02-09	I believe extensive training in acupuncture is necessary to provide the most beneficial biological response to treatment with acupuncture. A thorough understanding of TCM is necessary to avoid future complications with the patient and to be able to give a viable response to questions that may arise. Acupuncture is much more than just inserting a needle in to someone.
ROSE HOSEK	ROCKWELL CITY, IA	2015-02-09	I believe that anyone performing any kind of medicine should be well trained in that medicine. After all, one would not let a school nurse perform a knee surgery, nor should we let professionals with very little training perform acupuncture.
vishal verma	Seattle, WA	2015-02-09	There should be laws against untrained people practicing acupuncture. This should only be allowed for fully trained licensed professionals
Noel Jensen	Fort Collins, CO	2015-02-09	Americans deserve to receive acupuncture from thoroughly trained individuals.

Name	Location	Date	Comment
Donna Julseth	Woodward, IA	2015-02-10	I believe in only allowing qualified people to practice acupuncture
Suzanne Heber	Dubuque, IA	2015-02-10	I support our legislation and the amendments that eliminate the exemption for Doctors and Chiropractors.
Anne Stein	Des Moines, IA	2015-02-10	I have spoken to clients who tried acupuncture for the first time by going to a chiropractor who took "weekend courses". Not only did they not experience professional procedures with healing results but they were actually in more pain afterward and decided acupuncture is not for them. This is terrible for the REAL professional acupuncturists who have had graduate level training for years and provide real relief and healing for patients. The law in Iowa needs to change in order to protect clients from harm and so professional acupuncturists can represent the practice safely and ethically to the public for optimum health and fair business practices.
Margaret Howe	Pleasant Hill, IA	2015-02-10	I only want to receive acupuncture from someone that has a license. If my doctor is required to be licensed so should my acupuncturist.
Andrea Haag	Des Moines, IA	2015-02-10	I agree!
Carolyn Naayem	Bartlesville, OK	2015-02-10	I have friends and relatives in Iowa who use acupuncture to relieve pain and illness. they deserve the best care possible. I have had acupuncture treatment myself from a fully licensed person. I would trust no other! Iowa's fully trained and licensed acupuncturists know what is best for their patients. Trust themd and pass the bill! .
Jenny Johnston	Santa Cruz, CA	2015-02-10	I am an acupuncturist and wish to protect my profession and the public from harm done by undertrained acupuncture.
Teresa Story	Reynoldsburg, OH	2015-02-10	As an acupuncturist I find it an insult to the profession & a threat to public safety that other professions are allowed to practice with little, or minimal, training. This is not merely pushing a needle into the skin where it hurts, there is valid science & methodology that takes time and practice to learn. Yes, we both learn anatomy & physiology but from there or practices take us down different paths of study. They should be required to take any coursework that they haven't had, just as I would be required to if I were to practice in their fields.
Teresa Story	Reynoldsburg, OH	2015-02-10	As an acupuncturist I find it an insult to the profession & a threat to public safety that other professions are allowed to practice with little, or minimal, training. This is not merely pushing a needle into the skin where it hurts, there is valid science & methodology that takes time and practice to learn. Yes, we both learn anatomy & physiology but from there or practices take us down different paths of study. They should be required to take any coursework that they haven't had, just as I would be required to if I were to practice in their fields.
Chester Dickerson-Kanary	Houston, TX	2015-02-10	MD's and DC's should require more training to use acupuncture needles. I am both an MD and a licensed DOM, and I would never have attempted acupuncture without knowing the proper angles and depths. Without this knowledge, along with the theory behind it, may lead to complications (ie: pneumothorax).
Benjaamin Lockett	Minneapolis, MN	2015-02-10	Needling should be left to those who are licensed to do so.

Name	Location	Date	Comment
Mary Armstrong	Dubuque, IA	2015-02-10	I want to know that the person treating me is an acupuncture professional. This is a very specialized field requiring invasive techniques, not one that should be used without full certification.
Sandy Kohn	Dubuque, IA	2015-02-10	I went to a professional acupuncture who had over 1000 hrs of training etc. not covered by my insurance. He was a specialist and very thorough
Joan Swander	State Center, IA	2015-02-10	I'm signing because I have seen how much benefit a fully trained acupuncture specialist can provide. I would want everyone seeking help to have the level of care my mother has received.
Adele Knop	Ames, IA	2015-02-10	I want all acupuncturists to be properly educated in this part of the medical field. Acupuncture isn't an easy thing and we need qualified people doing this.
Tracy Warner	Ames, IA	2015-02-10	I have received great health improvement through acupuncture. This is a career where knowing the interconnections of symptoms and the body mean something that doctors overlook (being a cause not just treating a symptom). Doctors tend to treat symptoms instead of understanding the cause. I have had a lot of doctors tell me that stress could not cause my symptoms (and just to keep plugging my body with medicine) yet acupuncture has gotten to the bottom of releasing the reaction of stress which healed the symptoms. Acupuncture is an ancient means so it should be respected and worth the need for study time to perform. Thank you for consideration.
Jane Craiger	Des Moines, IA	2015-02-11	I believe in truly trained acupuncturists and don't want others to be fooled by those who do not really know what they are doing.
Shannon Esser	Melrose, IA	2015-02-11	I believe the practitioners I visit are knowledgeable and have had a wonderful effect on my life. I would not feel comfortable going for treatments from MDs, DOs, or chiropractors. They don't have the training necessary to do their best.
Susan Welu	Dubuque, IA	2015-02-11	I believe acupuncturists should be adequately trained and certified to practice safely and effectively as NCCAOM practitioners are certified.

Name	Location	Date	Comment
Irene Bassler	Moyock, NC	2015-02-11	Acupuncture has helped me a great deal. My acupuncturist has had approximately 2000 hours in acupuncture curriculum whereas most chiropractors or MDs have had 300 hours or less. Please make a distinction between the two types of acupuncture education. You have that distinction with all nurses (LPN, RN, ARNP, etc) and physicians (MD, DO, etc) -- why do you not have that distinction among "acupuncturists" (Not all are educated the same and there is a huge difference.) The general public deserves to know there is a difference when seeking help. Also the majority of Licensed Acupuncturists from an ACAOM accredited college have passed a national certification exam administered by the NCCAOM -- are chiropractors examined in the same manner? I think not. Please -- do not take this lightly and please do the right thing -- make a distinguished title for the different "levels" of acupuncture education. Thank you.
kayonaah kimberlin	Norwalk, IA	2015-02-11	I have used acupuncture and believe in increasing it's safety.
Dorothy Zierke	Carroll, IA	2015-02-11	I care
Tabitha Olsen-Bermgna	Minneapolis, MN	2015-02-11	This issue needs to be addressed. For the safety of the patients who receive Acupuncture, care it should only given by a Licensed Acupuncturist.
Erin Pederson	Ames, IA	2015-02-11	Acupuncture requires a high degree of training in order to be safe and effective for patients!
Michael Catalona	Davenport, IA	2015-02-11	I am a Licensed Acupuncturist and diplomate of the NCCAOM, and concerned about the quality of health care.
Susan Carlson	Rockwell City, IA	2015-02-11	I am signing because I believe that acupuncturists should all have graduate level training and national certification
Vicki Stutzman	Ames, IA	2015-02-11	If someone is administering acupuncture procedures the criteria should be universal. Medical doctors should not be given special exemptions.
Kim McCurry	Des Moines, IA	2015-02-12	I'm signing this petition to increase public safety by guaranteeing that all Iowa acupuncturists have Graduate level training and national certification.
Angie Sorrell	Dyersville, IA	2015-02-12	It's dangerous to allow people to practice acupuncture without the proper training and licensing.
Toni Lenning	Nevada, IA	2015-02-12	I am a firm believer of the necessity for J. Q. Public to know and understand the difference ibetween a Medical Doctors/Doctor Chiropractic and Acupuncturist with a Graduate level of training and national certification.
Carolyn Bleile	Peosta, IA	2015-02-12	Acupuncture is a serious profession and must be considered as such. We take other professions such as real estate and appraisals more serious than one that has to do with the health of a human being.
Sarah Fox-Jones	Ames, IA	2015-02-12	Performing acupuncture takes a significant amount of training. I want to make sure that those that do administer treatments have the proper training.
Don Schiffer	Dubuque, IA	2015-02-12	my treatment should have been covered
Kimberly Burnett-Hackbarth	Dubuque, IA	2015-02-12	Because I believe that proper medical training should be required for certified acupuncturists in the state of Iowa.
Rauchelle Meschke	Algona, IA	2015-02-12	I hold a Master's in Oriental Medicine and I am a practicing Licensed Acupuncturist
Marcie Larson	Britt, IA	2015-02-12	Irecieve acupuncture for pain in neck and shoulders which than gives me severe headaches. She is licencedand I cant imagine going through this pain without her. I do need neck and back surgery but I truely cant get by avoiding surgery. Aman to all acurpunturists.
Beth Johnson	Algona, IA	2015-02-12	Acupuncture helped with my migraines. I couldn't imagine not going.

Name	Location	Date	Comment
meghan thies	Dubuque, IA	2015-02-13	Allowing doctors and chiropractors to do acupuncture with 100 hours of training can be compared to hiring a personal trainer that paid \$50.00 for a certification to teach you to lift. If your trainer isn't well educated on lifts and the best exercise for the individual YOU WILL GET INJURED!
Amy Mager	Springfield, MA	2015-02-13	I am an acupuncturist who had over 950 clinical hours and over 1,255 didactic hours before being able to sit for my boards. Please require everyone who practices acupuncture to meet the same standard of care & be a licensed acupuncturist in the best interest of public health. Thank you! Amy Mager MS, LicAc, Dipl. OM (NCCAOM).
Tobias Moriset	Grimes, IA	2015-02-13	I believe in Acupuncture.
Michele Hall	Clive, IA	2015-02-13	Need safe and secure standards for acupuncturists.
Carol Frank	Panora, IA	2015-02-13	Acupuncture is a specialty and should be practiced by trained and registered acupuncturists only, and not by those that dabble in acupuncture as an add-on to their own profession.
Marilynn Wadden	Des Moines, IA	2015-02-13	Acupuncturists are critical to our health care, and every person who practices acupuncture must be trusted to have specific education. If you allow chiropractors and others to practice without the hours of proper training, then you put patients' lives in danger and open yourselves to lots of hassle. Just require the training and ensure safety of patients. While you're at it, require insurance to cover acupuncture. Patients will be healthier, and you'll save insurance companies money in the long run.
Dawn Thornton	Clive, IA	2015-02-13	I am signing as I have benefited from acupuncture with my chronic pain. It is better to try natural relief than meds.
twila Rankin	Knoxville, IA	2015-02-13	I wouldn't go to any one who isn't a licensed Acupuncture person any more than a non licensed Dr. of any kind.
Kim Ward	Norwalk, IA	2015-02-13	I suffer from scatica. Through acupuncture and chiropratic treatments I have been able to return to fulltime employment and am avoiding back surgery.
Sarah sievers	Ranchos de Taos, NM	2015-02-13	I am in school for acupuncture and those who don't put in the work are dangerous.
Kelly Johnson	Nevada, IA	2015-02-13	I'm signing this because when I go to an acupuncturist, I want to ensure that their knowledge and training are top notch. 2,000 hours compared to 100 hours is a huge discrepancy! Please hold acupuncturists to a high standard.
Daphne Tefft	Ankeny, IA	2015-02-13	good
marsha Bannister	Clive, IA	2015-02-13	There is much education needed to get the results needed. General Doctors are not trained specifically.
Bonny Hendricksmeier	Pleasant Hill, IA	2015-02-13	I believe restricting the practice of acupuncture to practitioners with proper certification and extensive training, rather than those who take a "weekend course" is in the best interests of the public. This is the same difference between seeking first aid from a co-worker and going to the emergency room for treatment of an injury from qualified medical professionals.
angela corio	Des Moines, IA	2015-02-13	I belive that all professional health care practices should be adequately trained in the area of specialty practice.
Brenda sherman	Milwaukee, WI	2015-02-13	As an acupuncturist concerned about the safety of patients receiving acupuncture therapy, especially in light of the increase in injury done by inadequately trained individuals.
Roxanne McCarren	Rockford, IL	2015-02-13	I use acupuncture.

Name	Location	Date	Comment
Jonathan Olcott	Venice, CA	2015-02-14	I'm signing this petition because I'm a licensed acupuncturist and I believe in the safe practice of acupuncture by individuals trained specifically in this highly effective form of medicine. A degree in chiropractic or allopathic medicine does not equal the safe or effective practice of acupuncture. A chiropractor cannot practice allopathic medicine because they lack the training, and an allopathic dr. cannot practice chiropractics without proper training. Acupuncture is no different and in fact much more difficult to learn than one might think. I believe it to be more difficult than either of the two Western practices listed above. The reason for this is because it does not fit into a western paradigm of medicine and requires a great deal of time and care in learning new and very foreign concept.
Thomas Phillips	Waukee, IA	2015-02-14	I strongly believe in the highest quality acupuncture service available and support the most strenuous standards possible.
Linda Mc Farlane	West Des Moines, IA	2015-02-14	I believe strongly that an acupuncturist needs to have completed specific course work, received careful training in the art of acupuncture treatment, and has performed safe needle technique under the supervision of a master acupuncturist for a time period of 2000 hours. National certification should be a requirement. Public safety is at stake.
Dianne Prichard	DeWitt, IA	2015-02-14	Seems like a good idea for my personal safety.
Victoria Fredenburg	West Des Moines, IA	2015-02-14	I do not believe it is right for a chiropractor or medical doctor to be able to call themselves an acupuncturist and practice the ancient art of acupuncture with limited or no training at all. Also, they should not be able to practice this art without required clinical training, annual continuing education classes and passing the same national exams that a licensed acupuncturist must take. I also believe that MD/Chiropractors must be REQUIRED to post their hours of training and clinical practice certificate next to their Medical Doctor degree.
MARIA CHUAPOCO	BOULDER, CO	2015-02-14	As a consumer, I have a right to expect a professional standard of care that only a properly educated and trained acupuncturist can deliver. To allow other "professions" to apply techniques without through knowledge of proper application, unfairly diminishes the professionalism practiced by Tradition Chinese Medicine practitioners.
rodger routh	Ankeny Ia, AL	2015-02-14	I support safe acupuncture as a healing aid for lowans.
Phyllis Hosek	Elberon, IA	2015-02-14	Acupuncture is an invasive medical procedure, the public and I needs to have graduate level trained and certified acupuncture professionals.
raul cambridge	Chicago, IL	2015-02-14	As an acupuncturist practicing for over 25 years there is no reason why Acupuncture should not be fully recognized and respected
Kay Acheson	West Des Moines, IA	2015-02-14	Doctors and chiropractors need more training to practice acupuncture than what this bill requires.
Lynda Goplerud	Waukee, IA	2015-02-15	I agree national credentialing and graduate level training should be required to practice acupuncture.

Name	Location	Date	Comment
cynthia prodzinski	Kendallville, IN	2015-02-16	I'm signing because I have been a patient of fully trained acupuncturists and value their care deeply. They have dedicated their professional lives to the education and training required to be nationally certified acupuncturists.
Logan Jenkins	Cedar Rapids, IA	2015-02-16	It's false advertising to say you are an acupuncturist if you are really an MD or DC. I am a Chiropractor and I support this.
Margaret Olmsted	Los Angeles, CA	2015-02-16	Doing acupuncture without extensive training is dangerous.
gina olson	Osceola, IA	2015-02-16	All professionals need to have the proper training and exam testing to be qualified to perform a service for patients!
Kay Sifert	Algona, IA	2015-02-16	I support acupuncturist
Linda Smith	Houston, TX	2015-02-16	It is common sense.
LISA LOUSCHER	Algona, IA	2015-02-16	I have acupuncture done once a week and would not want anyone but a licensed acupuncturist to do it.
Kathleen Stuart	West Des Moines, IA	2015-02-16	Signing because I believe in acupuncture and think Iowa needs to get with it!
Lon Olsen	West Des Moines, IA	2015-02-17	Those who practice acupuncture should have completed graduate level training, have national certification, and be required to obtain continuing professional education to remain current in their profession and to protect patient safety. A 100-hour course without testing, credentialing, or continuing education is hazardous to public safety and health.
Mia Hegarty-Roach	Algona, IA	2015-02-17	this just makes sense. If a physician can show that they have had equivalent graduate level training, great. But there should be training, and testing to ensure proper knowledge!
Rachel Garst	Coon Rapids, IA	2015-02-17	I want to make sure my acupuncturist has sufficient training.
Heidi Valdez	Des Moines, IA	2015-02-19	I have received Acupuncture treatments over the last 3 years and support the professionalization of the practice.
Karen Craft	Ames, IA	2015-02-19	I'm shocked that MDs and chiropractors are allowed to practice acupuncture with so little training compared with licensed acupuncturists.
Alexander Leanne	Ames, IA	2015-02-19	I feel safety in acupuncture should be a number one priority and having doctors and chiropractors doing acupuncture without the proper education is unacceptable.
Leo Gallego	St. petersburg, FL	2015-02-19	Because it is right
Cristi Pfantz	Rhodes, IA	2015-02-20	I believe that adequate training is important for all practitioners & it would be unsafe to practice acupuncture with just minimal training.
Janean Schaefer Denhart	Des Moines, IA	2015-02-20	I am a firm believer in acupuncture and strongly believe that it should only be practiced by educated, licensed professionals with extensive expertise and experience and education in Oriental medicine.
olivia hurm	Altoona, IA	2015-02-20	Its common sense... I wouldn't want someone with such LITTLE experience to perform acupuncture on me!
Penny Perkins	Wyoming, IL	2015-02-20	Acupuncture has played an important role in my health care and I want the best care that can be provided. I believe this is possible if practitioners stick with a specialty interest service.
Jill Watrous	Des Moines, IA	2015-02-20	Highly trained professionals in acupuncture care are the ones I want available for me, friends, and family to continue having safe health care through this form of important health support.
Liz Kurt	Ames, IA	2015-02-20	I support passage of HSB 101. I live in Ames, Iowa and that you support our legislation and the amendments that eliminate the exemption for doctors and chiropractors.

Name	Location	Date	Comment
Anne Kinzel	Ames, IA	2015-02-22	I believe this is a good bill with respect to the licensing of acupuncturists in Iowa. All proposed licensure statutes need to be carefully examined to understand if they truly involve the protection of the public versus simply protecting a profession from the involvement of professionals in other disciplines. I believe this bill comes down squarely on the side of protecting the public. This is why I support it as a former health care law specialist.
Jacqueline Van Ahn	Panora, IA	2015-02-22	This bill will insure that untrained people are not working in a field where the education requirements are immense.
Oulda Trahan	Papaikou, HI	2015-02-23	Being a Doctor or Chiropractors does not qualify them to practice acupuncture.
Lori Neufeld	Des Moines, IA	2015-02-23	I believe that regulated training to receive Iowa Licensing is imperative for the safety to the providers and patients.
megan Bielinski	Milwaukee, WI	2015-02-23	I'm an acupuncturist I'm Wisconsin, and supporting other nearby state acupuncture rights is of utmost importance
Heather Eldridge	Milwaukee, WI	2015-02-23	I am an acupuncturist and I agree that those that practice acupuncture should have equal levels of training. Acupuncture is an ancient form of healing and there is a lot of information that needs to be mastered in order to use it safely and successfully to help others heal.
Timothy Schimick	Madison, WI	2015-02-23	i am an acupuncturist.
Jerry Dickinson	Ames, IA	2015-02-24	I am signing because I want to ensure acupuncture is done in accordance with the procedures that have been developed over thousands of years.
Heather Hansen	Des Moines, IA	2015-02-24	Acupuncture has improved the lives of many I know, myself included.
Penny Schempp	Johnston, IA	2015-02-24	I want and need quality acupuncture and expect to be protected by the licensure law!
Ruth Kneile	Des Moines, IA	2015-02-24	I want safe acupuncture and fair practices for certification.
J Hendrickson Larson	Urbandale, IA	2015-02-24	This treatment is one cancer patients use in conjunction with chemo/radiation, etc. It needs to be performed by trained, peer juried experts.
Cathie Law	Johnston, IA	2015-02-24	I;m signing this because I believe there needs to be certification that ALL acupuncturists should have Graduate level training and national certification. ALL acupuncturists should have the same level of training. I believe anyone who is practicing acupuncture should have extensive training, CEU's and exams, to be certified in this area.
Kate McCoy	Urbandale, IA	2015-02-24	Acupuncture works! I felt better three days after my first acupuncture treatment than I did after four doses of different antibiotics.
Valerie Stallbaumer	Ames, IA	2015-02-25	I know the difference between well-trained practitioners using the techniques of acupuncture and Oriental medicine and others not getting the full training that just want to add a tool to their other techniques. I have received dozens of treatments from licensed acupuncturists for various areas of pain, for immune support and digestion problems. All with great results. Please uphold the quality of "real" acupuncture and the integrative methods of Oriental medicine as it is intended to be used by fully trained practitioners.
Zoya STAROSELSKY	West Des Moines, IA	2015-02-25	I am concern about the quality of practitioner's training.
Cindy McGuire	Des Moines, IA	2015-02-25	I believe that in order for practitioners to provide acupuncture they need to have very specific education, not enough to just have a weekend workshop. The human body is effected by even the smallest changes, practitioners need to have a very deep understanding of what that big picture looks like. I see this as part of the healthy state initiative. It's a must for Iowa to be leaders in this area of wellness.

Name	Location	Date	Comment
Cynthia Kobusch	Dubuque, IA	2015-03-26	I am a Doctor of Chiropractic and I believe just as this organization does, in that chiropractors just do not have enough training to be licensed to do this. I wouldn't want an acupuncturist adjusting his patients with only 100 hrs and very little continuing ed.
Donni Alley	Des Moines, IA	2015-03-29	I was restored to excellent health by a licensed acupuncturist here in Iowa during my multi-year battle with mercury poisoning.
Amber Kelley	Chaska, MN	2015-04-03	I'm an acupuncturist who has seen first hand the dangers of an under qualified acupuncturist. The public isn't aware of the training discrepancies, as MDs and DCs aren't required to inform their patients of the difference. I believe it is dangerous to allow doctors who have little to no supervised training in acupuncture and no board certification to be practicing this medicine on patients. If they wish to sit for the boards I am happy to welcome them into our community, but without any testing or continuing ed, I believe allowing them to legally practice is detrimental to both patients and our medicine, as many acupuncture horror stories I have heard involve either a chiropractor or MD.
Glenda Loving	Des Moines, IA	2015-04-05	I subscribe to the philosophy of being legally licensed in the field that a person has chosen and spent the time, trouble, money and effort to train themselves and conscientiously treat people effectively and professionally.
cind graff	scottsville, VA	2015-04-22	I'm pro alternative treatment as the AMA states we cannot help you in our western ways
Mary Simon	New York, NY	2015-04-26	Acupuncture only works if practiced by a trained Acupuncture Doctor who has been trained in China!
Sherri Jones	Ames, IA	2015-05-20	I believe in acupuncture done correctly. I have been going to acupuncturist for over 25 years and those with lots of training are superior to those that aren't.
Crystal Kelley	Eden Prairie, MN	2015-05-21	I am a relative of a professionally trained, graduate level, board certified Acupuncturist. I believe everything in the petition to be absolutely true.
Sheila Domantay	Vista, CA	2015-05-30	I'm an acupuncturist and proper training needs to happen before injuring the public by others not properly trained.
Nann Lang	Addison, IL	2015-07-18	Acupuncture is not simply putting needles into the skin. Sufficient knowledge is required for patients safety and to obtain effective results. Doctors and Chiropractors should not be exempt from passing licensure exams if they want to practice acupuncture.
Marie Ongaro	San Anselmo, CA	2015-07-27	It takes 3 1/2 years to learn TCM theory and how to practice it competently. It is not possible to accurately and safely use this medicine with a weekend or two week class. To have the title Acupuncturist it is required to pass the National or State Board license test which requires 2000 hour of Chinese Medical Training. Should Acupuncturists be allowed to perform chiropractic manipulations if we take a "mini" course? Anyone who would like to practice Acupuncture or Chinese Medicine should be held to the same standards of educational, licensure and continuing educational requirements.
Mike Morgan	Berkeley, CA	2015-07-27	I am an acupuncturist, a faculty member of an Acupuncture College and I firmly stress that the proper and safe practice of this medicine must be restricted to those persons who have studied the theory of acupuncture and the safe application of needles. I strongly support this amendment in order to protect the residents of Iowa!
Marlene Baczek	Arlington Heights, IL	2015-07-28	Anyone who wants to practice Acupuncture, should be board certified by NCCAOM.
Peggy Murrin	Novato, CA	2015-09-25	I have used it and it works!