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Dear Members of the Senate Committee on Health Care,

I am writing as a concerned citizen and advocate for safe, effective healthcare practices to express my opposition to any legislation that would permit physical therapists to perform acupuncture or "dry needling" without the comprehensive training and licensure required of licensed acupuncturists.

Acupuncture is a complex and deeply rooted medical modality, grounded in thousands of years of tradition and refined through rigorous academic and clinical training. Licensed acupuncturists undergo extensive education—typically over 3,000 hours—including biomedical sciences, anatomy, pathology, diagnostics, and supervised clinical experience. This depth of training ensures the safe and effective application of needling techniques, as well as the ability to manage complications or identify when needling is inappropriate.

In contrast, physical therapists seeking to perform "dry needling" often receive as little as 20–100 hours of weekend or short-course instruction. This minimal exposure does not provide the level of safety and clinical acumen needed for invasive procedures, especially those involving deep tissue and proximity to nerves, blood vessels, and vital organs. Serious adverse effects—including punctured lungs, infections, and nerve damage—have occurred when dry needling is performed by inadequately trained practitioners.

Furthermore, allowing physical therapists to perform needling blurs professional boundaries and undermines public trust. Patients deserve to know that anyone inserting needles into their bodies has undergone rigorous, standardized education and passed national certification exams to ensure competence and safety.

The argument that dry needling is distinct from acupuncture is misleading. Both involve the insertion of solid filiform needles into specific points on the body to relieve pain and treat dysfunction. Rebranding acupuncture techniques as "dry needling" does not change the risks or required expertise involved.

I urge the committee to protect public health by upholding high standards of care and ensuring that only licensed acupuncturists—those with the appropriate depth of training and experience—are legally authorized to perform acupuncture and any form of therapeutic needling. The integrity of our healthcare system and the safety of our communities depend on it.

Thank you for your time and commitment to patient safety.

Sincerely,

Heather K. Callison