

Murdo, Patricia

Subject: FW: public safety concern

My name is Sara Marie, I am a doctor of acupuncture and Oriental Medicine and I have been serving patients in Montana for 30 years. I am licensed by the Montana Board of Medical Examiners and nationally certified by the National Certification Commission for Acupuncture and Oriental Medicine. My doctorate is from the Oregon College of Acupuncture and Oriental Medicine which is a fully accredited college.

I have a concern that I was hoping to share with you.

I am contacting you because I believe that the public's safety is at risk. Currently, the Board of Physical Therapy Examiners is trying to pass rules that would enable them to practice Dry Needling. There are members of the board that are already practicing dry needling without rules, regulations or national testing for competency.

Do you know what Dry Needling is? Dry needling is an invasive procedure that consists of penetrating the skin with solid needles, Acupuncture needles. Every professional acupuncture association, the National Certification Commission for Acupuncture and Oriental Medicine and all acupuncture schools recognize that dry needling is the practice of acupuncture.

Concerns for public safety if the rules are established:

1. Physical Therapists will be able to perform this procedure with as little as **ten to thirty hours of training**. It has been determined by the Montana Board of Medical Examiners that over one thousand hours of specialized training is needed for Acupuncturists to penetrate the skin with solid needles.
2. There is currently **NO CREDENTIALING** for instructors of Dry needling courses, anyone may offer a weekend workshop for personal profit.
3. The proposed definition of dry needling in the rule would define dry needling as manual therapy, which we believe is **misleading and deceptive** to the general public.
4. Dry needling is invasive, breaking the skin. Under current law, invasive procedures are NOT allowed in Physical Therapists statutes! (Title 37, Chapter 11)

Here are a few harmful side effects that have **already happened** by **Dry Needling** from Physical Therapists in other states:

- *Pneumothorax (puncture of lung)
- *Cervical Epidural Hematoma
- *Chronic pain, which does not resolve itself and must be managed by medication.

We do not want similar public harm to occur in Montana.

Would you please contact your fellow legislators on the Economic Affairs Interim Committee and ask them to take action to stop the proposed rules from moving forward.

We conclude that a proper legislative process by the Board of Physical Therapists is required to add an invasive procedure to their practice.

Please keep an eye out for an email our association is sending out. It will have more information that will explain how and why this issue has gotten as far as it has.

THANK YOU SO MUCH FOR HELPING US PROTECT THE SAFETY OF MONTANANS! If you need more information feel free to contact our association or you may call me at 406-309-0681.

Respectfully,

Dr. Sara Marie, DAOM, L.Ac., Dipl. OM (NCCAOM)

Montana Association of Acupuncture and Oriental Medicine

Barbara Good, L.Ac. –President – [406-750-3802](tel:406-750-3802)

Bree Manninen, L.Ac. – Vice President – [406-587-6133](tel:406-587-6133)

Murdo, Patricia

Subject: FW: Dry Needling

Hi Pat,

My name is Lauren Oechsli. I am a licensed acupuncturist in Bozeman. I would like to express my concerns regarding the rule allowing physical therapists to practice dry needling in Montana. I am afraid there will be negative side-effects from this practice due to insufficient training. The standard curriculum for physical therapists does not include the concerns and cautions involved when breaking the skin with an acupuncture needle or any other instrument because no other therapy that they employ involves this invasive procedure. Until physical therapy schools and programs incorporate accredited coursework with accredited teachers, we can't be certain that the public safety has been attended to within reasonable limits. A weekend course is not only unlikely to produce a skilled practitioner that knows safe needling depths to avoid internal organ and tissue damage, but also cannot allow sufficient time for the amount of supervised needling on multiple body types that results in safe needling techniques.

The public trusts the state to protect them against unsafe practices. We trust that when we go to a licensed professional we will receive treatment that has acceptable risk. We trust that a physical therapist will not cause us further harm than our current situation. We trust that if we are in fact harmed that malpractice insurance will provide recompense. As it stands, physical therapists are practicing dry needling outside of their practice law, most commonly uncovered by malpractice insurance, and billing medical insurance for a manual therapy that is not yet defined as such. If passed, the rule may help it all become legal, but it does not help it become safe. Yet the public will not know the difference. The public will assume the state has done the legwork to ensure acceptable risk. I don't believe a weekend course is what the public would consider acceptable, and I believe that passing this rule would be at best misguiding.

Please convey my concerns to the Economic Affairs Interim Committee and urge them to stop the rule-making process.

Thank you.

Sincerely,

Lauren Oechsli, L.Ac.
Bozeman, MT

Spring Integrative Health
406-586-2626
springintegrativehealth.com