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Dear Board of Registration in Medicine

I support the proposal following language to be added to Section 243 CMR Section 5:01

after section 2.c. Addition of following language:

3. The practice known as "dry needling (DN)”, “intramuscular manual stimulation (IMMS)”, “neurologic dry needling (NDN)”, or any similar wording intended to describe biomedical acupuncture practice be determined to be within the definition, scope and practice of acupuncture.

I believe that dry needling is a style of acupuncture and that anyone who wishes to practice acupuncture should be properly trained, supervised during training, and then tested by a third party BEFORE they work independently on the public. There also needs to be a continuing education requirement. Renaming a technique dry needling and claiming it is different from acupuncture is akin to saying that a cupcake is not a cake, but rather different because it is baked in a paper wrapper and small.

Hopefully this will prevent what has happened in other states where physical therapists have added dry needling to their scope of practice and Acupuncturists are prohibited from using this term.

Respectfully,

Linda Robinson-Hidas