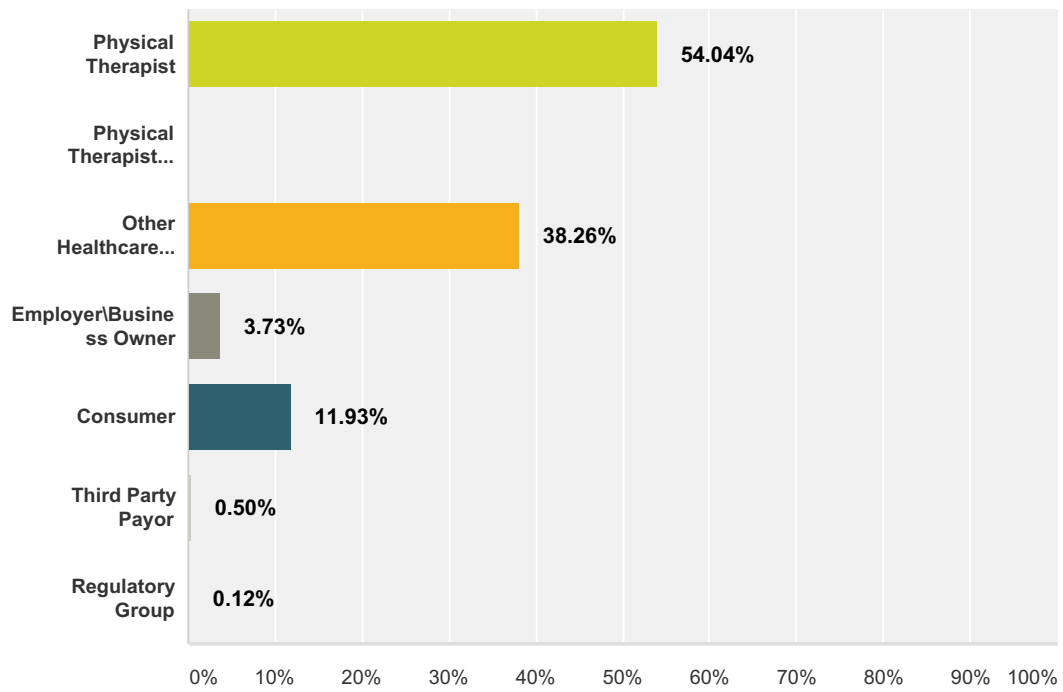


Q1 What is your relationship to the physical therapy profession?

Answered: 805 Skipped: 11



Answer Choices	Responses	Count
Physical Therapist	54.04%	435
Physical Therapist Assistant	0.00%	0
Other Healthcare Provider	38.26%	308
Employer\Business Owner	3.73%	30
Consumer	11.93%	96
Third Party Payor	0.50%	4
Regulatory Group	0.12%	1
Total Respondents: 805		

#	Address 2:	Date
	There are no responses.	
#	City/Town:	Date
	There are no responses.	
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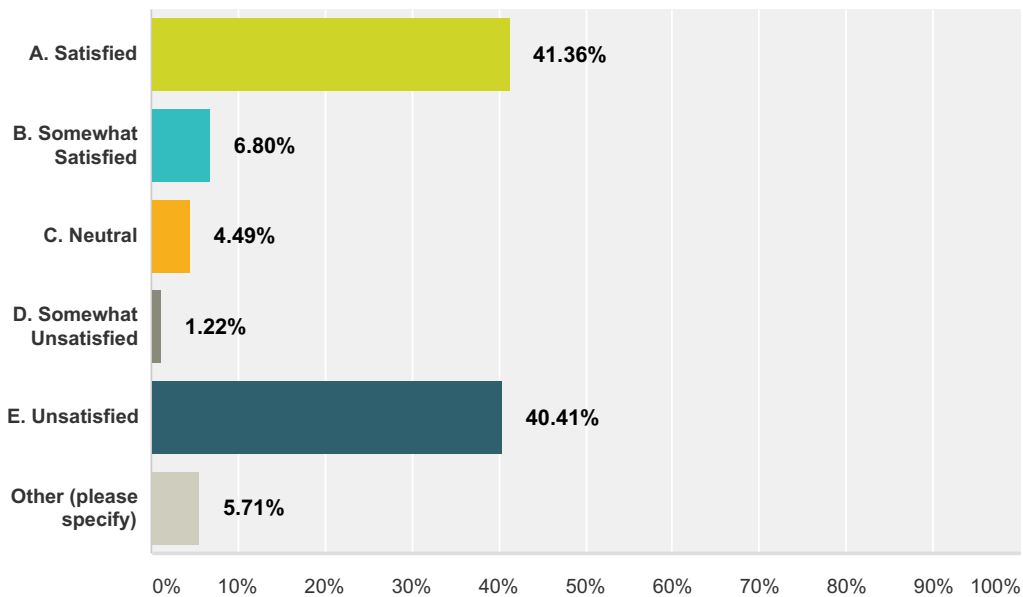
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11	tcook4321@aol.com	5/2/2015 7:57 PM
12	Dlafferty743@yahoo.com	5/2/2015 7:44 PM
13	annmarie@altosmedical.com	5/2/2015 7:28 PM

Q3 Please describe your satisfaction with Section A of the draft rules. Section AA.A.C. R4-24-*: PROFESSIONAL STANDARDS OF CARE AND TRAINING AND EDUCATION QUALIFICATIONS FOR DELIVERY OF DRY NEEDLING SKILLED INTERVENTION. EFFECTIVE JULY 1, 2015 AND IN ACCORDANCE WITH A.R.S. §32-2044(25), A PHYSICAL THERAPIST SHALL MEET THE QUALIFICATIONS ESTABLISHED IN PARAGRAPH (C) BEFORE PROVIDING THE SKILLED INTERVENTION “DRY NEEDLING”, AS DEFINED IN A.R.S. §32-2001(4).**

Answered: 735 Skipped: 81



Answer Choices	Responses	Count
A. Satisfied	41.36%	304
B. Somewhat Satisfied	6.80%	50
C. Neutral	4.49%	33
D. Somewhat Unsatisfied	1.22%	9
E. Unsatisfied	40.41%	297
Other (please specify)	5.71%	42
Total		735

#	Other (please specify)	Date
1	physical therapists should not be able to perform dry needling.	5/2/2015 9:33 PM
2	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:17 PM
3	highly dissatisfied	5/2/2015 8:22 AM
4	Horrified	5/1/2015 9:26 PM
5	Acupuncturist	5/1/2015 9:18 PM
6	insertion of filiform needles is the definition of acupuncture. It doesn't matter if the box is specially labeled as "dry needles"	5/1/2015 9:14 PM
7	24 hours is not sufficient to perform dry needling safely and poses health hazards to the public	5/1/2015 8:20 PM
8	Only a licensed Acupuncturist should be allowed to needle a patient. Twenty four hours of training is totally insufficient training!!	5/1/2015 7:47 PM
9	disgusted	5/1/2015 7:25 PM
10	Horrified	5/1/2015 6:29 PM
11	Outraged	5/1/2015 6:05 PM
12	disgusted	5/1/2015 5:42 PM
13	What are the qualifications they need to meet?	5/1/2015 4:26 PM
14	see comments	5/1/2015 4:23 PM
15	Acupuncturist should be the only one doing this	5/1/2015 1:45 PM
16	More than unsatisfied	4/30/2015 7:08 PM
17	physical therapists do not get enough training	4/30/2015 5:45 PM
18	I think "dry needling" should be called "acupuncture".	4/28/2015 10:29 PM
19	This ruling was an improperly obtained expansion of scope that was not properly vetted through the Sunrise process.	4/28/2015 9:57 PM
20	Simplistic training for a complex subject	4/27/2015 6:31 PM
21	Completely Dissatisfied and Concerned for consumer safety	4/24/2015 5:48 PM
22	Most dry needling courses are woefully inadequate. They are essentially doing acupuncture without proper training.	4/24/2015 3:49 PM
23	PT should not be performing invasive techniques. Acupuncture should be performed only by an Acupuncturist who has had 2 years undergrad and 4 years training in Acupuncture. we have over 3200 hours of training.	4/24/2015 8:14 AM
24	Horrified	4/24/2015 12:01 AM
25	not enough training	4/23/2015 5:24 PM
26	Not an appropriate technique for PTs. Needling is a skill set that is reserved for acupuncturists and PTs are not trained in acupuncture	4/23/2015 2:56 PM
27	Without a degree in Acupuncture and Chinese Medicine nobody should be allowed to perform needling	4/23/2015 12:04 PM
28	Very limited qualifications	4/23/2015 5:48 AM
29	Too many safety issues not considered. Not a diagnostic process involved in treatment. Dry needling IS acupuncture.	4/22/2015 9:38 PM
30	This is,Acupuncture without 3400 hrs of training.	4/22/2015 9:10 PM
31	Dry needling is not safe unless trained in acupuncture. Not a weekend workshop.	4/22/2015 6:24 PM
32	DPT should be adequate	4/13/2015 9:22 PM
33	It doesn't say what we have to do to meet that qualification.	4/10/2015 5:56 PM

34	Irritated, alarmed, concerned beyond words	4/10/2015 3:51 PM
35	Dry needling is acupuncture without adequate training!!!!!!!!!!!!	4/10/2015 1:50 PM
36	need to think about whether it needs to be a Physical Therapist instructor. For example, my instructor was an Asian Doctor with decades of experience and truly a master of his craft.	4/5/2015 8:57 PM
37	I don't think that this is appropriate for our profession	4/5/2015 9:39 AM
38	confused	4/3/2015 11:33 PM
39	kinetacore training is the best for dry needling	4/3/2015 8:19 AM
40	OK but but so not specific at this point	4/2/2015 10:07 PM
41	Too much legalize.	4/2/2015 6:20 PM
42	An therapist who has taken the course prior to Jan 1, 2015, should be Grandfathered in. The courses were approved by the different states and were taken with that understanding.	4/2/2015 5:35 PM

Q4 Please provide any comments regarding Section A.

Answered: 352 Skipped: 464

#	Responses	Date
1	24 hours of training is absolutely insufficient for a person to be fully qualified to perform dry needling.	5/3/2015 12:31 AM
2	This is acupuncture and therefore out of the scope of practice for a PT.	5/2/2015 11:43 PM
3	24hrs of training to do this is a travesty. It gives the public a very wrong idea of what acupuncture truly is	5/2/2015 10:59 PM
4	Unfortunately, dry needlers with little training are producing unfortunate results such as collapsed lungs. Please leave needles to folks better trained in them, such as acupuncturists. We have a four year Master's program to teach us to needle - 24 hours just doesn't cut it.	5/2/2015 10:34 PM
5	24 hours is not nearly enough to have an understanding of indications and contraindications of any modality. Irresponsible	5/2/2015 10:22 PM
6	"Dry needling" actually is doing acupuncture, it will bring to public a huge risk when practicing it by someone only has such a short time training of needling. It is an irresponsible act!	5/2/2015 10:19 PM
7	physical therapists are not trained to perform dry needling as it is a form of acupuncture and they know nothing about this and often times perform it improperly, thus causing pain, and scaring patients away from real acupuncture.	5/2/2015 9:33 PM
8	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:17 PM
9	Safe practice of this technique should require more than "a minimum of 24 hours" of education.	5/2/2015 8:16 PM
10	I have been an Occupational therapist since 1988 a massage therapist since 1991 and earned my Masters of Acupuncture Studies in 2008. I worked in the 7th integrative medicine center in the country and now am the Director of Clinical Education and Services at the Won Institute of Graduate studies in Glenside PA. Acupuncture is at least 3000 years old and to earn a Masters of Acupuncture Studies one must complete 3000 hours or 120 graduated credits including 900 hours of clinical education 300 preclinical and 600 clinical hours. Your law requires 24 hours of training. That is less than inadequate training. Acupuncture theory takes into account that the intricate bioenergy system of a human being must be supported with constitutional needling before the local tight tender points are needled. Just because there is western medical training does not mean that a physical therapist is adequately trained to assess and treat with needles after only 24 hours of training. Our Pennsylvania law requires that one must have a Masters of Acupuncture Studies or be a Medical Acupuncturist in order to perform needling. I recommend that you protect your Arizona citizens from sure injury that an under trained physical therapist will inflict upon them. Require a Master's degree of Acupuncture Studies or a Medical Acupuncture certification. PROTECT YOUR CITIZENS FROM UNDEREDUCATED, INADEQUATELY TRAINED PHYSICAL THERAPISTS!	5/2/2015 8:03 PM
11	It is definitely a skilled intervention that takes many hours of training and supervised practice	5/2/2015 7:59 PM
12	24 hours of training provided by whom?	5/2/2015 6:26 PM
13	It is unacceptable, and unsafe to the public to have any one else except an M.D. or Acupuncturist to use needling of any kind within the skin. 24 hours training is even more outrageous and a major safety hazard. You are making a huge mistake	5/2/2015 5:25 PM
14	Section A reference to Section C that requires only 24 hrs of training. First, I do not feel PT should be doing dry needling when there are better qualified providers with hundreds or thousands of hours of training. As a consumer I object to allowing providers expand their role such inadequate training.	5/2/2015 5:11 PM
15	Please leave any kind of use of needling to professional acupuncturists. This legislation undermines the institution of acupuncture.	5/2/2015 5:03 PM
16	Please note that even an M.D spends 400 hours in a course to perform dry needling. I have twenty plus years as an acupuncturist, and this clearly will misrepresent the effective treatments provided by a truly licensed and trained professional acupuncturist. Please let a physical therapist perform their job and refer to a licensed Acupuncturist.	5/2/2015 4:23 PM

17	Dry needling is just a word for acupuncture. You cannot learn acupuncture in a matter of hrs.	5/2/2015 4:13 PM
18	If there are License for Acupuncturists in the State of Arizona, how can a PT do "Dry Needling" which is putting ACUPUNCTURE NEEDLES into a person's body? Let the PTs go to Acupuncture School.	5/2/2015 3:48 PM
19	More than 24 hrs should be required before sticking needles in people. Even physicians take a minimum of 300 hours- and we already are familiar w anatomy	5/2/2015 3:42 PM
20	25 hours training is unacceptable and a public health hazard.	5/2/2015 3:35 PM
21	Much more training should be required for anyone to use needles on a patient	5/2/2015 3:35 PM
22	As a student of Medicine and Acupuncturist at SCNM and PIHMA in Arizona, I would like to give my input on the proposed regulations to allow physical therapists to perform dry needling or biomedical acupuncture with only 24 hours of training. In Most states, Acupuncturist accumulate over 1200-2000 required hours to graduate and practice along with passing board exams. A 24hr course is a danger to patients and grossly inadequate training to encompass such a large encompassing medicine behind "dry needling". Please Please Please Caution and Re-Evaluate the ideology behind this 24hr lecture.	5/2/2015 3:30 PM
23	These are not enough qualifications and holds a completely different standard from those in the state wanting to perform acupuncture who must go through 3-4 years of schooling and obtain a state license in acupuncture. A physical therapist who wants to perform "dry needling" should become a licensed acupuncturist. This is somewhere around 3,000 hours of clinical and didactic training.	5/2/2015 3:06 PM
24	I think 24 hours to then be able to utilize needles in therapy is hideously insufficient. It is indicative of professional who obviously have no understanding of cause and effect of the energetic systems of the body. In interest in protecting the public first and foremost they should at minimum meet the requirements equal to the MDs and Chiropractors utilizing needles as therapeutic modality in their profession. More people will be injured. More training is paramount and that cannot be obtained in 24 hours. I see no mention either of any clinical practice with observation, correction and implementation which again would be impossible with 24 hours. Its dangerous!	5/2/2015 3:03 PM
25	Not enough training!	5/2/2015 3:02 PM
26	Dry needling is a invasive procedure that requires significant study and practice to perform safely. While I am unclear on the curriculum needed, hundreds of hours performing dry needling under supervised practice would be prudent to use this as a modality.	5/2/2015 2:52 PM
27	24 hours of training is inadequate. The standard of care should require at a minimum professional master's degree or professional master's level certificate or diploma in acupuncture or a professional master's degree or a professional master's level certificate and diploma in Oriental medicine. Why are Medical Doctor's, Naturopathic Doctors, Chiropractors, and Licensed Acupuncturists held to a different standard? It also states that PTs need only attest that they have received such training, and not provide any proof of training. Nor does it require them to inform their patients that they have only 24 hours of training. This is comparable to seeing a doctor and not asking for a degree, or seeing a doctor with only a weekend certification in medicine. In the proposed PT regulations, there is no required supervised clinical training whatsoever. This is deeply disturbing and presents a public danger. Already other states that have allowed dry needling have seen an increase in pneumothorax injuries.	5/2/2015 2:50 PM
28	Dry Needling is Acupuncture. PT's are not adequately trained and are more likely to harm someone. This is not safe to license PT's to insert needles in this manner.	5/2/2015 2:41 PM
29	There is not sufficient training, licensing and continued education. I will not be using these services. I will continue to go to a certified acupuncturist.	5/2/2015 2:39 PM
30	No training in Chinese medicine nor the 4,000 years of expertise Chinese medicine provides in acupuncture. " Dry needling" is a scam and should not be allowed when there is minimal knowledge to what poking subsurface tissues can or cannot do for the body.	5/2/2015 2:38 PM
31	It is appropriate for them to have the same training with acupuncture needles as an acupuncturist and should have to take a state board equivalent. Not doing so is a negligent act and is a public safety issue!!	5/2/2015 2:07 PM
32	They are practicing acupuncture without having the required hours and yearly continued training to do so.	5/2/2015 2:06 PM

33	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:05 PM
34	Physical therapist should not be doing Acupuncture	5/2/2015 1:02 PM
35	This is a professional outrage! Needles should be in the hands of professionals.	5/2/2015 12:32 PM
36	Skilled intervention of any medical technique requires sufficient training and practice. I can't imagine 24 hours of contact education can meet such requirement.	5/2/2015 12:22 PM
37	As an acupuncturist, in addition to core medical training, we also receive 1,000 hours of clinical internship training and supervision as well as 500 hours of observation of skilled practitioners before being allowed to sit for the national boards. It is neither safe nor effective to allow physical therapists to practice without at least some supervised training on actual patients. If the profession is going to stand by dry needling, it's their responsibility to ensure that all practitioners are adequately trained. Otherwise, it hurts both the physical therapy profession as well as the public's perception of both acupuncture and dry needling. I have personally heard many dry needling "horror stories" from patients, and I believe this could be prevented with proper training and supervised internship programs prior to allowing the therapists to practice on the public. I believe it is an irresponsible choice to release under trained therapists into the community to practice.	5/2/2015 11:28 AM
38	24 hours of training is not nearly enough time to cover even the basics of needling. There are programs in place for a reason for LAc's and naturopaths before needling is done.	5/2/2015 11:17 AM
39	Licensed acupuncturists receive intensive collegiate education covering required subject matter. They enter into a spiritual rapport with their clients based on ancient Chinese medicine that transcends needling.	5/2/2015 10:25 AM
40	What is required is minimal considering what is at risk.	5/2/2015 10:20 AM
41	There is no way you will obtain proper safe training of the use of needles in only 24 hours. It is absolutely vital that you learn needle depths and that is not included anywhere in your training! Your course content should not be decided upon by your healthcare association as it is not in your scope of practice. The California State Board of Acupuncture should be determining every aspect about this proposal as they are the only ones with adequate knowledge and licensure to do so.	5/2/2015 10:12 AM
42	See my previous comments.	5/2/2015 10:10 AM
43	I can not believe that 24 hours of training is adequate. A licensed practitioner requires a Masters Degree to practice acupuncture. 24 hours of training is not the standard of care and training and education that I can find reasonable.	5/2/2015 10:01 AM
44	Dry Needling is acupuncture and should require licensure as a Licensed Acupuncturist completing the same education requirements that a licensed Acupuncturist must complete.	5/2/2015 9:59 AM
45	24 hours of training is not an acceptable length of training.	5/2/2015 9:48 AM

46	24 hours is not nearly enough training for this invasive technique. Other medical organizations require much more training to use acupuncture needles to "dry needle" a patient's tissues. MD's require 300 hours of additional training. Other practitioners require even more. The lowest number of hours in similar needling techniques is 70 hours and that training is limited to 5 specific points in the ear only. This training puts the public safety at risk and is NOT sufficient. Please consider greatly increasing the training before allowing Physical Therapists to practice this technique. See the following for more details on these regulations for other professions: On this issue, safety is our greatest concern. Twenty-four hours is an insufficient level of training to ensure unsuspecting members of the public are not harmed. Local, national, and international organizations and healthcare communities agree: The World Health Organization (WHO), the national Accrediting Commission for Acupuncture (ACAOM), and current Arizona law have set a minimum standard for needling of at least 1,850 hours specifically in didactic and supervised clinical practice in acupuncture (not including bio-medicine education requirements) Arizona law does permit the practice of acupuncture with less training, for the purposes of treating addiction. However, these auricular detox specialists are limited to only 5 points in the ear and must receive 70 hours of training and be supervised by a licensed acupuncturist. Finally, the American Academy of Medical Acupuncture (AAMA) the organization that represents Medical Doctors that practice acupuncture recognizes dry needling as acupuncture and as an invasive procedure. Further, AAMA recommends M.D.'s to have an additional 300 hours of training on top of their four year medical degree and non-physicians (including Physical Therapists) to have 2,000 hours of education and training. Clearly, national and world organizations recognize the need for many more hours of training and supervised experience before allowing practitioners to put acupuncture needles into their patients, no matter what you call it. Please consider raising your standards of training before allowing this practice. Thank you.	5/2/2015 8:58 AM
47	The insertion of the needle is not in the realm of physical therapy training and cross the gap of physical medicine into internal medicine.	5/2/2015 8:28 AM
48	It is my understanding that the responsibility of the board of governing this field is to ensure that the public is treated by qualified members in a safe manner. This bill does not meet any standard of safety that i can imagine. "Dry needling" is acupuncture. Acupuncture requires several thousand hours of training in order to properly and safely diagnose and practice. This bill represents a failure of the board to protect the public.	5/2/2015 8:22 AM
49	PT should spend 4 years and 3300 hours with over 800 supervised intern hours and passing 3 board exams before being allowed to "dry needling" aka acupuncture. Too many injuries result from under trained clinicians performing needling.	5/2/2015 7:54 AM
50	Qualifications established are at least 1,000 short of being acceptable for "dry needling" acupuncture.	5/2/2015 7:43 AM
51	Accupuncture is a medicine, not to be toyed with by amateurs. Would you let anyone proscribe pills?!	5/2/2015 7:41 AM
52	This is not enough training!	5/2/2015 7:39 AM
53	Acupuncturist have 2000 contact hours before they can safely treat patients. The term dry needling is essentially performing acupuncture . 24 contact hours of training is not sufficient. This is very problematic and should be considered out of scope for PTs.	5/2/2015 7:39 AM
54	The training is not enough.	5/2/2015 7:31 AM
55	I would only want a licensed acupuncturist to needle me!! Not someone who has on a day course on this...!!	5/2/2015 7:16 AM
56	Dry needling is acupuncture and it should be performed by a board certified acupuncture physician.	5/2/2015 7:12 AM
57	This is very irresponsible and dangerous. This neglects true patient care to be so undertrained. I honestly hope that the pt board falls under heavy scrutiny and receives many lawsuits regarding this..	5/2/2015 6:15 AM
58	Dry needling is ACUPUNCTURE!! Physical therapists are not trained acupuncturists.	5/2/2015 4:08 AM
59	The required training is not enough hours.	5/2/2015 2:46 AM
60	Not enough training to provide invasive medical procedure	5/2/2015 12:58 AM
61	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's	5/2/2015 12:44 AM
62	Not enough education. Period.	5/2/2015 12:43 AM
63	24 hours of training is unacceptable. You are endangering people lives.	5/2/2015 12:23 AM
64	They do not get the proper training to administer needles into a persons body.	5/2/2015 12:05 AM

65	If any physical therapist can start dry needling on July 1, 2015 without any prior training, they may induce more harm than good. Licensed acupuncturists attend at least a 4 year program to learn the correct way to use acupuncture and how to avoid causing harm to a patient.	5/2/2015 12:00 AM
66	There's no way 24 hrs is adequate. I wouldn't feel safe or comfortable receiving this treatment from a PT.	5/1/2015 11:05 PM
67	Absolutely appalling to allow dry needling by anyone who is not trained as an acupuncturist because they don't know what is safe. But allowing dry needling with so little training is asking for injuries or even deaths. It is obscene to even have this piece of legislature up for a vote.	5/1/2015 10:56 PM
68	PT's should not be performing acupuncture with out a license to practice acupuncture. "Dry Needling" is a technique in acupuncture. Calling it another name doesn't negate the fact that it is acupuncture.	5/1/2015 10:47 PM
69	Dry needling is acupuncture and any person practicing acupuncture should be a licensed acupuncturist. For safety sake, no exceptions.	5/1/2015 10:47 PM
70	This is ridiculous and a danger to the public. A licensed acupuncturist has 3000 hrs/5 year degree & to propose that PTs with 24 hours of training could be competent working with needles is absurd. As an acupuncturist I've seen numerous injuries from dry needling. Please reconsider. Would you feel comfortable with an acupuncturist offering physical therapy after 24 hours?... or even 100 hours of training? Likely not.	5/1/2015 10:35 PM
71	Its a mockery of Traditional Chinese Medicine for the purpose of profit. I'm so tired of these money hungry assholes gobbling up any treatment modality that they can get their greasy hands on. TCM takes years to learn and a lifetime to master, dry needling is a joke.	5/1/2015 10:24 PM
72	24 hours of training is so low compare to 1000s of hours that acupuncturist received. Without proper training, this will post a threat to the public!	5/1/2015 10:22 PM
73	I think 24 hours as a minimum is far too little time. I understand that the dry needling is for trigger points only but 24 contact hours is inadequate. I disapprove.	5/1/2015 10:21 PM
74	It takes countless hours to be skilled with a filiform needle. This proposal is irresponsible, negligent, and puts consumers at risk!!!	5/1/2015 10:19 PM
75	Physical therapists should not be allowed to do dry needling. Dry needling is acupuncture. If you want to do acupuncture then go through a program that requires at least 3000 hours of education as well as go through all the other requirements acupuncturist are required to go through to do acupuncture.	5/1/2015 10:18 PM
76	sounds like acupuncture and should be done by a LAC.	5/1/2015 10:10 PM
77	Inadequate period of training in terms of time and proper education	5/1/2015 10:01 PM
78	Acupuncturists study 4 years to provide a standard of care far exceeding what dry needling can offer. The public does not know the difference. And there is a great deal of difference. It is a travesty to dilute this amazing modality to dry needling. Physical therapy has its gifts and so do acupuncture physicians. Let us not muddy the waters and dilute the two modalities.	5/1/2015 9:52 PM
79	The training requirements seem entirely to brief to teach safe techniques and adequate knowledge.	5/1/2015 9:51 PM
80	Only a license acupuncturist or trained naturopath have hundreds of hours of acupuncture training. This is not enough training. They can do damage if they insert the needles and go the wrong way!	5/1/2015 9:47 PM
81	24 hours is far too little training to qualify even very experienced health care professionals in the the proper use and techniques of needles for healing and diagnostic evaluation. Please seriously reconsider these requirements.	5/1/2015 9:47 PM
82	Inserting a filiform needle is safe with limited side effects when practiced by physicians and licensed acupuncturists. There have been an increasing number of cases of practitioners doing "dry needling" and causing harm including but not limited to pneumothorax. For the safety of the public seeking medical help in Arizona, I ask you to consider raising the education and training requirements to the level of licensed acupuncturists.	5/1/2015 9:46 PM
83	24 hours of training???? Are you kidding???? Dry needling is acupuncture. Acupuncturists need hundreds of hours of supervised training before inserting needles without supervision. This law is a major public safety nightmare.	5/1/2015 9:42 PM
84	This is acupuncture with 24 hours of training, public is not protected!	5/1/2015 9:40 PM
85	As a healthcare provider and a consumer I would not want a physical therapist doing dry needling on me. They will not be correctly trained in that amount of time.	5/1/2015 9:37 PM
86	Dry needling is acupuncture and without adequate training can result in serious injury and death.	5/1/2015 9:35 PM
87	A minimum of 24 hours is not sufficient to provide adequate training for puncture of the skin.	5/1/2015 9:35 PM

88	PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:30 PM
89	Dry needling is Acupuncture. Licensed acupuncturists complete 1500 hours of Acupuncture study along with at least 1500 more didactic hours in addition to 300+ hours supervised clinic hours and have to have seen 300+ supervised patients to get this training which is being offered in a seminar. This is plain dangerous.	5/1/2015 9:26 PM
90	Dry needling is acupuncture with less training. Any other provider (MD) would need to go into further training to become knowledgeable in treating patients in acupuncture.	5/1/2015 9:22 PM
91	Physical therapists offer an invaluable contribution to healthcare; so do Acupuncturists. Allowing Physical Therapists to perform "dry needling" with such little training is dangerous to patients, as well as disrespectful to Chinese Medicine. It is a disservice to everyone. When there are plenty of well-trained Acupuncturists, allowing inadequately trained Physical Therapists to use acupuncture needles to bastardize the medicine is dangerous and irresponsible. If a physical therapist would like to incorporate an ancient medicine into his/her practice, they should be advised to enroll in acupuncture school.	5/1/2015 9:18 PM
92	Many pneumothoraxes and other issues have been the nasty result of a PT or unlicensed professional (one that may only hold a certification) performing dry needling. This is a real issue in the field of acupuncture because the media will portray it as a technique using ACUPUNCTURE needles, but they will fail to mention that a PT was the one performing the technique. This puts patients at a huge risk and they will avoid any acupuncturist because they are not given the proper credit they deserve. The act of dry needling is always argued to be different from acupuncture and yet the media will use that word in the description of a failed treatment. I would never recommend a patient to seek out dry needling when they can visit a professional who put many hours and much of their life into studying the art and technique of healing through needling. The PT is not an expert in that field, but an acupuncturist is, hence receiving a MASTERS degree in that field. Physical Therapy has its place and it isn't in the world of needling.	5/1/2015 9:16 PM
93	As a licensed acupuncturist, I find this sort of thing reprehensible.	5/1/2015 9:14 PM
94	What they are calling dry needling is actually the practice of Acupuncture. To perform Acupuncture, the PT's should be required to fulfill all of the requirements that an L.Ac. is required to fulfill in the State of AZ. Anything less is very troubling and dangerous.	5/1/2015 9:08 PM
95	Education is completely insufficient to provide the PT with enough training to reduce and eliminate the risk of harm to the patient, especially pneumothorax. Similar techniques used by other healthcare professions require significantly more training and documentaion of training. For example, Acupuncturists are required to have over 1,000 hours of clinical training and pass a national board exam in order to practice in the state of Arizona.	5/1/2015 9:05 PM
96	The intervention "dry needling" is simply acupuncture. To allow physical therapists to perform the intervention is an infringement on the acupuncture profession.	5/1/2015 8:41 PM
97	this is inadequate training to become an acupuncturist.	5/1/2015 8:37 PM
98	I do not believe physical therapists have proper training to perform dry needling. There have been many horrifying stories about the misuse of filiform needles by PTs.	5/1/2015 8:34 PM
99	This educational standard is way below any licensed providers. Medical doctors and chiropractors require at least 200 to 300 hours of training before allowing practice by their boards. At a minimum physical therapists should be the same.	5/1/2015 8:26 PM
100	It is absolutely ridiculous that physical therapists can endanger their patients by performing acupuncture (or filiform needling) risking pneumothorax as well as many other conditions with minimal, poorly regulated training with little to no clinical hours. At the very least physical therapists should have the same training as chiropractors and medical doctors (200-300 hours) if not licensed acupuncturist (1500-2100 hours). Twenty hours in what is essentially a surgical procedure (putting a needle in and through the skin) is below any sort of standard any reasonable practitioner would want for their profession to ensure that no harm is created (first do no harm) to their patient base.	5/1/2015 8:26 PM
101	Dry needling is acupuncture, which requires a three year education. A brief course in inadequate and unsafe.	5/1/2015 8:20 PM
102	An Acupuncturist is recognized by the National Certification for Acupuncture and Oriental Medicine after 900 plus hours of clinical experience so that mistakes that could endanger patients lives do not happen. This is beyond irresponsible!	5/1/2015 8:14 PM
103	That is nowhere near enough training for this kind of treatment.	5/1/2015 8:09 PM
104	More training should be required to perform these services. Sounds like a public health risk.	5/1/2015 7:59 PM

105	24 hours of training as a minimum is truly a danger to the patients. As an acupuncturist we spend 4 years learning the proper methods of needling into a with supervision during those 4 years. Including the understanding and indications of each acupuncture point, we also learn the appropriate needle depth for each acupuncture point. 24 hours is not enough time to review even the most dangerous points and to be aware of the proper depth and needle technique so as to not injury the patient. Pneumothorax, hemorrhaging of a vein, brain damage and insertion of needles into vital organs are all possibility if the person administrating "Dry needling" are not qualified and educated.	5/1/2015 7:55 PM
106	Needs to include more training.	5/1/2015 7:47 PM
107	Acupuncture training requires 2,000+ hours of training, including classes on anatomy/physiology like physical therapists' training. A "minimum" of just 24 hours is not enough to properly train a therapist of any type to insert needles into patients safely with the same effectiveness as a fully trained acupuncturist.	5/1/2015 7:37 PM
108	24 hours education is not sufficient to learn how to properly needle a patient. Acupuncturists have 3 years of school to learn proper technique	5/1/2015 7:37 PM
109	NEedling should ONLY be administered by a LICENSED ACUPUNCTURIST! An individual with 4 plus years of education on acupuncture and the administering of it.	5/1/2015 7:35 PM
110	I don't think you can be trained in such a short time to do these procedures	5/1/2015 7:31 PM
111	If you want to needle become an acupuncturist	5/1/2015 7:25 PM
112	Based on the number of organ punctures documented, the education and training for "dry needling" is sub par.	5/1/2015 7:19 PM
113	Dry needling is acupuncture. It is a form of acupuncture and is merely being marketed and hyped in order for PT's to receive abbreviated and inferior training to perform acupuncture. There is nothing new or unique about dry needling except a therapist is allowed to receive a weekend of training to perform a professional service that an acupuncturist receives thousands of hours to perform safely with appropriate understanding of the global physical effect of the technique. Any lay person could attend the same seminar and come away with the ability to perform dry needling. It is a disservice to the public to support this market scheme to expand physical therapist scope of practice without the time and money to fully learn what they are doing with acupuncture needles.	5/1/2015 7:17 PM
114	Physical therapists are not trained for 4 years as licensed acupuncturist are. They're not qualified to needle anyone! Let alone be trained for such little time. You are endangering the public. This is negligence and unbelievable.	5/1/2015 7:14 PM
115	Acupuncturists require far more training than this--please visit ACAOM for standards.	5/1/2015 7:12 PM
116	These practitioners should refer to a license acupuncturist instead expanding into acupuncturist practice.	5/1/2015 7:10 PM
117	This is not enough training. It possess a threat to public safety.	5/1/2015 7:05 PM
118	Dry needling is merely a bastardized form of Acupuncture with far less training and not nearly enough understanding of what the points can do. For example: Several of the "motor point" or "trigger points" used are cautioned against using in pregnancy for fear of causing miscarriage. No on teaches this in "dry needling" seminars.	5/1/2015 6:58 PM
119	24 hour training is insufficient and poses possible risks to patients. Proper needle insertion training is imperative as not only can it cause pain, bending of needle, and stuck needle if therapists are unfamiliar with insertion techniques and risks associated.	5/1/2015 6:53 PM
120	PTs should not be practicing "dry needling."	5/1/2015 6:53 PM
121	Dry needling is acupuncture with out adequate training. It is dangerous the public.	5/1/2015 6:45 PM
122	There is no such intervention as "dry needling"! This manipulations is called ACUPUNCTIRE!!!	5/1/2015 6:44 PM
123	The public is in DANGER!. 24 hours is enough for learning to ride a bicycle, not to stick needles in live human thoraces. How about 2400 hours?	5/1/2015 6:44 PM
124	24 hours is not nearly a sufficient amount of training. These people will be inserting a medical device into patients. It it is irresponsible and reckless to have so little training. the safety of patients is at stake- there have been numerous injuries such as pneumothorax by insufficiently trained PTs. I beg you to reconsider.	5/1/2015 6:43 PM
125	Par C inadequate	5/1/2015 6:43 PM
126	24 hours is not enough time for training to have anyone stick needles in consumers and patients.	5/1/2015 6:35 PM
127	A.4.C. I would not let someone stick a needle in me, nor would I expect improvement, after a 24 hr course.	5/1/2015 6:31 PM

128	Dry Needling is form of acupuncture, and it is unacceptable that a Physical Therapist should be required only 24 hours of training to perform such a complex modality. Please reconsider.	5/1/2015 6:29 PM
129	This is ridiculous training and you are placing unsuspecting patients at risk!	5/1/2015 6:29 PM
130	The training requirements are extremely inadequate to ensure patient safety.	5/1/2015 6:25 PM
131	Too little training required	5/1/2015 6:22 PM
132	Not enough hours training. Should be same as licensed acupuncturists requirements	5/1/2015 6:20 PM
133	24 hours is not an appropriate amount of education to perform this invasive procedure.	5/1/2015 6:19 PM
134	Since a practitioner of Chinese medicine has to study 4 years with extensive testing to be able to safely perform acupuncture, don't you think it isn't highly negligent to think that someone can be qualified with only 24 hours training. It is more than just sticking a needle into a muscle and there are dangers. I would never never trust my life to someone with such little training. I wonder how many pt's know what a pneumothorax is and how to avoid that when performing dry needle.	5/1/2015 6:18 PM
135	I only receive needling from my acupuncturist who has received 2000 hours of training. The risk of pneumothorax is too great with someone other than a highly trained professional. Also, the acupuncture profession should be protected.	5/1/2015 6:17 PM
136	24 hours of training to do dry needling. Shouldn't the profession in Arizona hold itself to a higher standard when public safety is at stake?	5/1/2015 6:17 PM
137	It does not seem professional to allow someone who has never handled a needle to be able to perform this skill with only 24 hours of training.	5/1/2015 6:13 PM
138	Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason.	5/1/2015 6:12 PM
139	Unsatisfied with provisions in section C	5/1/2015 6:11 PM
140	Acupuncture should not be performed by PT's. It is not in their scope of practice. Real acupuncturists have 3000+ hours of training and are state certified for acupuncture.	5/1/2015 6:05 PM
141	Most people who are qualified to needle patients study or are trained more than 24 hours. In fact they are required to treat more than 350 patients during their internship. With the limited amount of training physical therapists are in put in a precarious position of seriously harming patients.	5/1/2015 6:02 PM
142	The amount of knowledge that a person needs to do "Dry Needling" otherwise known as Acupuncture, is far beyond 24 hrs. Acupuncturists have a course load of 1300-2000 hrs and even then are continually learning the vast field of knowledge. It is totally unsafe to have Physical Therapists with such minimal training, treating patients in this manor. Plus, it is a different field of work and they should just direct their clients to a licensed Acupuncturist. I myself, wouldn't want to see a surgeon who had 24 hrs of training.	5/1/2015 6:01 PM
143	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:56 PM
144	I am appalled at the amount of training of a PT for doing Acupuncture which it is what they are doing You may call it by anothere name but That is what they are doing. I was a nurse for 26 years and I received the proper training 3 years took national boards and was by law able to practice I am now a Lic acupuncturist and teacher of acupuncture and herbs I received 4 years of traing took National boards and am qualified to treat patients. I feel if everyone must hold to the law. Why are the PT's exempt. Thank You Pam Wallach Llc Acup. R.N.	5/1/2015 5:54 PM
145	You want to allow physical therapists to perform dry needling with only 24 hours of training (as compared to over 1250-2000+ hours required by most states for acupuncturists)? And they are not required to inform their patients that they have only 24 hours of training? And there is no required supervised clinical training whatsoever? This is deeply disturbing and presents a public danger.	5/1/2015 5:54 PM
146	24 hours is not enough hands on time. As an acupuncturist, we had in just needling over 100 hours classroom training. Then we had another year practicing on people other than classmates. We already knew our anatomy like PT's. 24 hours hands on does not come anywhere close to the practice the PT's need. It is dangerous.	5/1/2015 5:48 PM

147	To be quite clear, the act of inserting an acupuncture needle into the body, under any pretense, or for any purpose whatsoever, is the practice of acupuncture. "Dry needling" is far outside both physical therapists' scope of practice and their scope of education and training. In most states, to become a licensed acupuncturist, an applicant must complete a minimum of 1,905 hours of education and supervised clinical training (1,245 hours of education and 660 hours of supervised clinical training). Yet you are wanting physical therapists who are not licensed by law to practice acupuncture to insert acupuncture needles (up to four inches or more in length) into unsuspecting patients with 24 hours of training!!!! "Dry needling" was first described over 2,000 years ago in China's earliest and most comprehensive extant medical treatise, the Yellow Emperor's Inner Classic (Huangdi neijing), where it discusses in detail using tender or painful points, also known as "trigger points" or "motor points," to treat pain and dysfunction, particularly of the neuromusculoskeletal system. Simply described, "dry needling" involves inserting an acupuncture needle into a tender or painful point and then appropriately manipulating (rotating and/or pistoning) it for therapeutic purposes. The Food and Drug Administration (FDA) classified acupuncture needles as Class II medical devices subject to strict regulations under the federal Food, Drug, and Cosmetic Act (FDCA) and FDA's regulations. Individuals purchasing or receiving acupuncture needles who are not licensed by law to practice acupuncture are directly violating both civil and criminal provisions of the FDCA intended to protect public safety. 21 U.S.C. § 331(a)-(c), (g). These include the FDA's requirements that acupuncture needles can only be sold to "qualified practitioners of acupuncture." 61 Fed. Reg. 64616 (December 6, 1996). FDA prescription labeling requirements themselves specifically prohibit the sale of acupuncture needles to anyone who is not a qualified practitioner of acupuncture. The required FDA prescription labeling on the package from which acupuncture needles are to be dispensed states: "Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the States." 21 CFR § 801.109(b)(1) (emphasis added). Any individual who is not licensed by law to practice acupuncture is directly violating the FDCA and FDA's civil and criminal prohibitions when they purchase or receive acupuncture needles for use in "dry needling."	5/1/2015 5:45 PM
148	This is a serious danger to the general public.	5/1/2015 5:45 PM
149	Dry needling is ACUPUNCTURE. Acupuncturists go through thousands of hours of training before sticking needles into people's bodies. This neglectful practice by PTs will very likely result in organ damage (lungs, kidneys) punctured arteries and damaged nerves. It would be malpractice to allow such a procedure in unskilled hands.	5/1/2015 5:44 PM
150	24 hours is absolutely not enough training hours to permit safe insertion of any needle into the body. There is a direct correlation between lack of training and serious injury from dry (ie pneumothorax). Training and supervised hands on experience should be no less than 250 for a profession who has absolutely no previous experience inserting needles into the human body.	5/1/2015 5:42 PM
151	24 hours is absolutely not enough training! This is dangerous and irresponsible.	5/1/2015 5:40 PM
152	Much more training required	5/1/2015 5:39 PM
153	Acupuncturist have to study for up to 4 years, take a clean needle exam and have several hundred hours of supervised needling before they can legally use a filiform needle. Why can PT use them with only 24 hrs class time and no clean needle technique exam?	5/1/2015 5:38 PM
154	I do not agree with the minimal level of training that physical therapists have to acquire in order to perform essentially acupuncture , in which as acupuncturists are trained well over 1200 hours. It is not safe or enough training to perform such practices involving penetrating skin in order to elicit neurological response. It is a much more complicated study than 24 hours.	5/1/2015 5:33 PM
155	Dry Needling is an acupuncture technique, if a physical therapist would like the authority to practice acupuncture then they should be an acupuncturist.	5/1/2015 5:33 PM
156	Acupuncturists need to Go school for a min of 3 years and pass several boards before needling someone. The laws regarding licensure for them should be changed if now it just takes 24 hrs. This is a very dangerous and wreckless proposal	5/1/2015 5:31 PM
157	A physical therapist does not have the qualification, education, or training to perform invasive procedures with the use of an acupuncture needle.	5/1/2015 5:31 PM
158	Acupuncturists in CA receive over 1000 hrs of training for needle insertion. I do not believe this small amount (24 hrs.) of training is sufficient to prevent harm to patients as evidenced by many recent complaints involving pnemothorax with dry needling.	5/1/2015 5:29 PM
159	It is just fightening all around. 24 hours? No clinical supervision??	5/1/2015 5:25 PM
160	24 hours is insufficient training to achieve a level of competence in this technique, and protect patient safety.	5/1/2015 5:25 PM

161	A full four year program should be required of any practitioner.	5/1/2015 5:25 PM
162	There is no way a PT can provide "skilled intervention" after completing only the qualifications listed.	5/1/2015 5:18 PM
163	24 hours of training is absurd and a huge safety concern! Physical Therapists should have to meet the 2,000 hours of training requirement set forth by the American Academy of Medical Acupuncture to be able to perform "dry needling".	5/1/2015 5:17 PM
164	This is not nearly enough training for this very important usage of acupuncture needles.	5/1/2015 5:14 PM
165	You must increase the minimum hours of required study. 24 hours is not nearly sufficient to safely ascertain that the therapist will not cause unnecessary harm to their patients. Increase to minimum 500 hours clinical observation and treatment with supervision.	5/1/2015 5:04 PM
166	Dry needling is acupuncture. Needs far more training than proposed	5/1/2015 5:01 PM
167	Dry needling is acupuncture performed with inadequate training. I have already had several patients who have received this style of treatment and report it to be painful and ineffective compared to acupuncture as performed by an acupuncturist. Most of the injuries and fatalities with needling involves dry needling, as opposed to acupuncture by a properly trained professional. Please take patient safety into account, in addition to the requirements for training for acupuncture program.	5/1/2015 4:56 PM
168	Only a licensed acupuncturist with over 1,500 hours of training is qualified to perform this action.	5/1/2015 4:54 PM
169	this new regulation does not provide enough time and scope of training for dry needling. Dry needling is not in the scope of practice for physical therapy. This is not appropriate.	5/1/2015 4:51 PM
170	They should have more training and take a clean needle test.	5/1/2015 4:42 PM
171	Insanity ! what profession is this? Acupuncture training is 4 years not 24 hours. A giant ego ! to think 24 hours and you can bill insurance I will never have faith in the Western Medical field ever if this goes thru.	5/1/2015 4:40 PM
172	Dry needling is a type of acupuncture and should only be performed by licensed acupuncturists certified by the NCCAOM	5/1/2015 4:37 PM
173	Acupuncture students have point location, indication, contraindication, safe needling and many more. As an acupuncture student I had 720 internship hours. Dry needling practitioners must attend long enough training at the accredited acupuncture school!!!	5/1/2015 4:28 PM
174	How could I have an opinion without knowing the qualifications they need to meet!?	5/1/2015 4:26 PM
175	24 hours is INSUFFICIENT training	5/1/2015 4:23 PM
176	these standards are insane! Dry Needling is acupuncture and PT's are performing a service they know nothing about and it is absolutely a public safety issue!!!	5/1/2015 4:20 PM
177	There is not enough hours to provide clean needle techniques or safety techniques in proposed hours	5/1/2015 4:08 PM
178	acupuncture is a lot more than just taking needle in people	5/1/2015 4:02 PM
179	This is a hazard to public. Dry needling is puncturing the skin with a needle. That stimulates a response in the body. The depth at which the needle is affected causes different things to happen. There is a philosophy that is immensely deep. Not understanding this medicine which takes decades, but at minimum, 4 years to get a degree. Going to a weekend course and practicing "dry needling" is beyond incomprehensible.	5/1/2015 3:47 PM
180	24 hours is NOT a sufficient amount of training for a PT to perform acupuncture (dry needling). As a Licensed Acupuncturist myself, I was required to obtain over 1,000 hours of training. Therefore I feel there is a serious public safety concern due to their lack of education and training in needling. I feel it would be in the best interest of consumers/patients to require more training for PTs who wish to needle.	5/1/2015 3:32 PM
181	If a patient wants acupuncture they need to get it from an Acupuncturist not a physical therapist.	5/1/2015 1:45 PM
182	My greatest concern is safety, as I believe that 24 hours of training is woefully insufficient and puts the public at risk. It also risks great damage to your profession because even on its face, two weekends of training is substantially low. As an student studying acupuncture for 4 years to get trained and licensed I feel it is a disservice to the public to let physical therapist stick an acupuncture needle anywhere they feel it is needed because the patient states it hurts at this point.	5/1/2015 1:09 PM
183	I would not let a person with so little training to touch me	5/1/2015 12:43 PM
184	the words "dry needling" mean "acupuncture".	5/1/2015 11:04 AM

185	The AAMA recognizes dry needling as an invasive procedure using acupuncture needles that has associated medical risks. Therefore, the AAMA maintains that this procedure should be performed only by practitioners with extensive training and familiarity with routine use of needles in their practice and who are duly licensed to perform these procedures, such as licensed medical physicians or licensed acupuncturists.	5/1/2015 10:57 AM
186	24 hours is not sufficient	5/1/2015 6:25 AM
187	An art that requires thousands of hours of education and practice that has powerful results, namely Acupuncture...should not be allowed to be used by individuals with merely a 24 hr education.	5/1/2015 2:07 AM
188	Very little training, not transparent to public about qualifications.	5/1/2015 12:02 AM
189	I do not believe a physical therapist should be able to perform dry needling, unless he or she is also a licensed acupuncturist. 24 hours to insert a need into someone is not enough hours of training nor do I feel it is in the physical therapist's scope of practice. I am a student of both occupations and the extensive training it takes to become an acupuncturist greatly out weighs any 24 hours/weekend course. Dry needling inserts needles, acupuncture insert needles more training and knowledge is needed therefore I am very unsatisfied with this draft rule	4/30/2015 11:04 PM
190	It is my understanding that "dry needling" is doing acupuncture without adequate training. If you are using ACUPUNCTURE needles, you are doing ACUPUNCTURE, and NOT "dry needling"	4/30/2015 10:12 PM
191	I am appalled that the PT board is suggesting only 24 hours of training. This puts the public's health and safety in danger. Inserting needles into someone is an aggressive therapy and requires thousands of hours to develop the kind of proficiency and safety that the public deserves. It is clear that the PT board is more concerned with fraudulently billing insurance companies for Acupuncture or Biomedical Acupuncture under the disguise of "Dry Needling" than it is for ethical practices that both help people heal and keep the public safe.	4/30/2015 9:46 PM
192	Paltry education for the insertion of needles. It is unfortunate that the PT group put ego before public safety.	4/30/2015 8:26 PM
193	The qualifications do not include enough training nor clinical practice to warrant this as skilled intervention.	4/30/2015 8:16 PM
194	24 hours is not enough training for PT's to do "dry needling" You are setting a very dangerous precedent.	4/30/2015 7:41 PM
195	I am a physician licensed in the State of Arizona. I routinely practice acupuncture for multiple conditions in my office. I also routinely use other therapies involving the insertion of needles into the bodies of my patients. I have trained for 4 years in medical school, 2 years of residency, and have done further extensive training through the American Academy of Medical Acupuncture (AAMA) in both the art and the mechanics of acupuncture. The AAMA recognizes dry needling as an invasive procedure using acupuncture needles. This procedure has associated medical risks, including accidental precipitation of pneumothorax (collapsed lung). Therefore, the AAMA maintains that this procedure should be performed only by practitioners with extensive training and familiarity with routine use of needles in their practice, and who are duly licensed to perform these procedures, such as licensed medical physicians or licensed acupuncturists. The practitioners must also be qualified to deal with any complications which they may cause through their use of acupuncture needles. Physical therapists are not routinely trained in the use of needles, nor do they routinely use needles as part of their practice of physical therapy. A 24-hour course of training is certainly insufficient to qualify physical therapists to insert needles into the human body. As much as I respect physical therapists, and as frequently as I use their services for my patients, I would not send a patient to a physical therapist who thought that 24 hours of training was enough to make them qualified to perform this procedure, whether it be called "dry needling" or "acupuncture".	4/30/2015 7:08 PM
196	Deficient training to be called"skilled".	4/30/2015 6:06 PM
197	Would like the required training for dry needling to be more than 24 hours. I believe it should require at least a minimum of 200 hours, if any puncture of the skin for therapeutic reason is performed such as this technique. If MDs and DOs are required at least 200/300 hours of training for similar practices; then, the same should apply for other healthcare practitioners such as physical therapist.	4/30/2015 5:45 PM
198	Acupuncturists go to school for 4 years to learn about the intricacies of acupuncture, physical therapists are doing harm to clients because they only learn the mechanics, and none of the whys	4/30/2015 5:45 PM
199	Quackery	4/30/2015 4:39 PM
200	If you want to perform put needles in people's skin, you need much more training than what you have proposed. Acupuncturists, nurses, doctors, and paramedics put needles in people's skin and have much more training than what you have proposed. Please revise this before you release these people on the public!	4/30/2015 4:17 PM
201	The hours of training is not sufficient.	4/30/2015 3:43 PM
202	Training is inadequate and puts patients at risk	4/30/2015 2:46 PM

203	Not enough training hours. They should be required as many hours as the licensed acupuncturists.	4/30/2015 2:01 PM
204	No needling should be done unless the practitioner is a licensed acupuncturist.	4/30/2015 1:59 PM
205	The education required for PT's to perform acupuncture is a danger to the public!	4/30/2015 1:50 PM
206	PTs should have more training then 24 hours to begin needling clients. You are putting patients at risk!	4/30/2015 1:46 PM
207	Re-naming acupuncture as dry needling doesn't change that it is doing acupuncture. Why is the physical therapy profession wanting this for their businesses? Refer like any good caring compassionate professional health care provider to someone in their scope of practice. Since when is perforating the patient's skin with acupuncture(filament needles) in the scope of physical therapy?	4/30/2015 11:44 AM
208	physical therapists do not have the proper training or understanding of needling	4/30/2015 9:57 AM
209	The training is not adequate in safe needle technique. Also there is some use of Traditional Chinese Medicine acupuncture points used outside the paradigm without understanding the actual function and interaction of the points this includes the contraindications and diagnostic parameters. This can lead to less than effective treatment and unattended negative treatment consequences that may or may not show up during a course of treatment. Also there is no current literature that supports this form of biomedical acupuncture as particularly beneficial in conjunction with PT. My concern is patients will think they're getting special 'acupuncture' and they're getting a hybrid form of needling that is neither acupuncture or trigger point needling (which would be a helpful adjunct for PT's to use in a course of therapy. Also the actual acupuncture needle used is only FDA approved for professionals fully trained and credentialed in Acupuncture/Traditional Chinese Medicine.	4/30/2015 9:22 AM
210	I do not feel 24 hours of training is even close to being adequate training. I have a diabetic friend who developed a serious foot infection from a Physical Therapist who needed her foot. A 3 month training might be more appropriate, if they are to do it at all.	4/30/2015 6:54 AM
211	Public safety is NOT paramount when such a small number of hours is deemed adequate to provide acupuncture treatment, under the guise of "dry needling." Hundreds of hours of academic and clinic experience is needed to even qualify for testing for licensure for acupuncturists. PLEASE PROTECT THE CONSUMER.	4/30/2015 2:04 AM
212	Physical therapist should go to acupuncture school is the want to needle patients. It poses a great danger	4/30/2015 12:19 AM
213	Medical Doctors currently get 300 hours to perform acupuncture, dry needling is a form of acupuncture. What makes the PT Board think that PTs are competent with 24 hours of training? This is just stupid.	4/29/2015 3:02 PM
214	24 hours of education with no supervised clinical time has proven inadequate to protect the public against serious adverse events. Meeting those qualification is not adequate.	4/29/2015 9:28 AM
215	I think "dry needling" should be called "acupuncture".	4/28/2015 10:29 PM
216	24 hours of training for an invasive procedure is terribly inadequate. There also needs to be very specific limitations of what can be treated by dry needling: for example a PT should not attempt to gynecological problems, or alletrgies etc with dry needling. I have heard of PTs attempting to treat conditions out of their jurisdiction by looking up protocols for acupuncture which requires the ability to diagnose with TCM.	4/28/2015 4:08 PM
217	Please refer to the NCCAOM requirements as well as the AZ Acupuncture BOE requirements for doing the same thing. Physical Therapists should follow the same laws and regulations.	4/26/2015 5:44 PM
218	Dry needling is acupuncture and is already licensed in AZ	4/25/2015 12:19 AM
219	Not enough training, dry needling is acupuncture and acupuncturist have app. 1000 hours of classroom and clinical hours...	4/24/2015 8:31 PM
220	As a massage therapist, I am required to complete more than 24 contact hours of continuing education. I am not piercing the skin, muscle, tendon, etc.	4/24/2015 6:34 PM
221	Physical therapists needs more training before engaging in practicea that resemble internal medicine.	4/24/2015 6:03 PM
222	24 Hours of CEU's on how to insert an acupuncture needle is completely unacceptable and unsafe for the consumer. Using the term "dry needles" to describe a bastardized form of acupuncture is 1)deceptive to the public 2)harmful to patients because the PT's performing the dry needling are in NO WAY competent to treat pain/illness with acupuncture needles. 3) Completely dissuades the public from getting legitimate, safe acupuncture therapy from a fully trained & licensed individual. I am an acupuncturist who was required to obtain over 3000 hours of training & clinical practice to practice. A PT performing acupuncture and calling it "dry needling" is akin to me taking a weekend course in Physical Therapy and then adding it to my scope of practice. This would obviously be a huge disservice to the patient and other fully trained Physical Therapist.	4/24/2015 5:48 PM

223	The training required is substandard and puts the public at risk. At a minium without a medical licence ie L.ac, DC, MD, ND they should have over 3000 hours of training to address cautions with needles ie area where they can puncture organs such as lungs, liver, heart etc.	4/24/2015 4:47 PM
224	Ask yourself, should an acupuncturist be able to take a 24 hour course and be qualified to perform physical therapy?	4/24/2015 4:08 PM
225	No one should be doing "dry needling" who is not a licensed acupuncturist.	4/24/2015 3:23 PM
226	This is not enough training and it is dangerous to their patients.	4/24/2015 2:43 PM
227	24 hours minimum is not enough. Even phlebotomist have more training and in class practice!	4/24/2015 2:28 PM
228	this does not include sufficient education and training	4/24/2015 1:45 PM
229	Dry needling uses a tool that is actually a acupuncture needle. It is confusing to patients that get treatments with an acupuncture needle that they are actually not getting acupuncture. I believe strongly that to serve patients best it is critical for health care practitioners to get full training in an acupuncture degree program to use acupuncture needles in their practice.	4/24/2015 12:56 PM
230	Physiotherapists should not be doing dry needling because they will take money from my family. I have 11 kids.	4/24/2015 12:25 PM
231	This is very little training to be using needles on the public. With little training the risks are higher for injury to occur. This is an issue of public safety and I do not agree with these standards!	4/24/2015 10:44 AM
232	"dry needling" is another term for acupuncture which requires a high level of skill to avoid injury. As a registered nurse, and a current student of Chinese Medicine, I find it completely inappropriate, and a danger to public safety that the requirement is 24 hours of instruction.	4/24/2015 10:42 AM
233	A 24 hr class is about 3,000 hrs short of the proper education needed to insert Acupuncture needles into the body. Dry Needling is Acupuncture and Acupuncture is Dry Needling. The State of Oregon declared this to be fact in a lawsuit recently. A Masters degree in Acupuncture is the required education with supervised hands on clinical supervision along with a strong background in theory is needed. A 24 hr class will place the public at great danger and confuse the public on the efficacy of what Acupuncture can treat.	4/24/2015 8:56 AM
234	24 hours is severely insufficient time to establish safe practice guidelines in a classroom setting. 450 hours provides enough time to cover all the necessary information in class and give learners enough time to practice under direct supervision before working on the public.	4/24/2015 7:14 AM
235	PT's should be required to go through the same hours as a licensed acupuncturist. This is ludacris.	4/24/2015 3:06 AM
236	To be able to understand what one is doing when needling, takes a minimum of 1300 hours of training, practice and supervision. Just placing needles, if not done in a point prescription, will not be efficacious. There are depths, angles and placement techniques that must be carefully done! You could be allowing PTs to potentially harm their patients.	4/24/2015 1:03 AM
237	This is very disturbing that any professional could be allowed to practice in another profession without the same training as that professional. I would not feel it appropriate for me to be able to do minor surgery with 24 hours of training. Acupuncture needles/points requires thousands of hours of training to provide SAFE and EFFECTIVE acupuncture for patients. There is much theory and technique that needs to be learned over years of training to be these things. Even as a patient I do not think that I would feel comfortable having someone with a sharp object puncture my skin with only one day of training. I would love to see the malpractice insurance rate (it should be more like a brand new driver with little experience having a higher rate than a mire experienced driver).	4/24/2015 12:34 AM
238	The standards are too low. A 4 years Masters program offered by an accredited college is the minimum education and training required to perform "dry needling" which is acupuncture in a disguised spin on syntax.	4/24/2015 12:01 AM
239	You have essentially decided to provide the same service as acupuncturists under the alias of "dry-needling".	4/23/2015 10:22 PM
240	Dry needling is ACUPUNCTURE. It is a skill that requires more training than the weekend course that the Physical Therapist is required to do.	4/23/2015 8:53 PM
241	a degree in acupuncture and Chinese medicine is a must to practice "dry needling", which is a way around licensing. To do acupuncture properly one must understand it.	4/23/2015 8:31 PM
242	This is acupuncture. Lack of education is harmful to the public. If you want to do acupuncture/dry needling then please get the proper education and go to acupuncture school. I am not an acupuncturist but an MD and will not refer any of my patients to a physical therapist that does "dry needling."	4/23/2015 8:31 PM

243	How can a physical therapist be allowed to dry needled or essentially perform acupuncture with rules set by physical therapists. Based on this logic an acupuncturist can perform physical therapy with a weekend course.	4/23/2015 7:45 PM
244	Should have the same qualifications as an acupuncturist since you want to practice acupuncture	4/23/2015 5:24 PM
245	There is a vast body of knowledge and potential effects of needling and PTs are not trained in this knowledge, its potential effects, its relation to the whole person (i.e.more than a specific body part) - in 24, 48, or even 100 hours. Just as it is inappropriate to counsel patients in psychological issues, it is in appropriate to do a form of acupuncture to patients without the appropriate background and training.	4/23/2015 2:56 PM
246	I know my comment does not specifically pertain to Section A, but in my opinion, 24 hours of education is not enough to safely and effectively perform dry needling.	4/23/2015 12:12 PM
247	without the proper training in Chinese Medical theory nobody should be allowed to preform any type of needling especially dry needling	4/23/2015 12:04 PM
248	there should be some language to separate "dry needling" from Acupuncture, in training and use.	4/23/2015 9:10 AM
249	24 contact hours is not enough. Several states including California require anyone inserting a filiform aka acupuncture needle have the sama amount of clinical training as acupuncturists. This should be across all 50 states as there have been multiple cases of collapsed lung & damaged nerves. This is no small thing. 2,400 clinical hours and passing the National exam please.	4/23/2015 8:27 AM
250	I agree with the rules.	4/23/2015 7:59 AM
251	Physical Therapist should NOT perform "Dry Needling". Would you allow massage therapist to perform Physical Therapists job???	4/23/2015 6:41 AM
252	A licensed acupuncturist has over 6000 hours of training. These qualifications are ridiculously small.	4/23/2015 5:48 AM
253	Dry needling is acupuncture and should only be administered by someone with adequate training such as an acupuncturist	4/22/2015 11:43 PM
254	The standards outlined in paragraph C are insufficient.	4/22/2015 10:14 PM
255	The required amount of hour training is insufficient. It should be 309 hours.	4/22/2015 10:01 PM
256	Insufficient training hours to protect public safety.	4/22/2015 9:50 PM
257	Dry needling needs to be defined to encompass all philosophies treating with filiform needles. This is no different than acupuncture and has little training to be considered a form of "medicine".	4/22/2015 9:38 PM
258	I think it's not safe for a physical therapist to do dry needling only based on 24 hours class. We should prohibit physical therapist to do that. They should need more training hour as acupuncturists do.	4/22/2015 9:37 PM
259	Not enough training to perform invasive procedure. 24 hrs does not ensure competency for practitioner or safety for the public. The risks associated with the invasive nature of the dry needling procedure extend beyond those listed in Section A	4/22/2015 9:22 PM
260	First and foremost, I don't believe that physical therapists should be allowed to perform dry needling at all. If they are going to use "filiform needles" which is the technical name for an acupuncture needle, they should have to go through proper acupuncture training.	4/22/2015 9:18 PM
261	Its,a danger to allow non qualified practitioners to do an Acupuncturist ptocol.	4/22/2015 9:10 PM
262	What is considered "qualified" in PT is not safe for patients.	4/22/2015 9:03 PM
263	24 hours of classroom instruction that includes clean needle technique, blood borne pathogens, and the indications and contraindications for dry needling is not sufficient to insure public safety. Comparison of the dry needling points and acupuncture points has demonstrated that the majority of targets of the dry needling method correspond to the points used by license acupuncturists. More than 50 years of research into acupuncture has shown that there are a wide range of actions of the points, ranging from inducing uterine contractions to raising and lowering blood pressure. Without adequate training--which, according to the experts on the subject, the Chinese, involves years of intensive college level instruction--a variety of adverse effects are possible. It is naive to assume that administering a treatment that is, in fact, very similar to acupuncture without an adequate practical and didactic background is likely to result in tragic adverse effects and compromise public safety.	4/22/2015 7:44 PM

264	"Dear PT Board, The thought that my PT. (I am receiving PT now) would think to do acupuncture, which you have named 'Dry Needling,' with the few hours you suggest is frightening. If a nurse had that little education time I would be very concerned. PT's do not have the background for insertion of needles. Nurses, Doctors, and Acupuncturists have hundreds of hours of training and clinicals that include the safety and affective use of the insertion of needles. With this little amount of training (basically a weekend workshop with no clinicals) the PT cannot know what happens physically or energetically when needles are inserted under the skin. We already have had two, maybe more, of our Olympic athletes harmed because PTs did not know what they were doing. Think carefully before you make a grab for one more modality for the sake of money. It may come back to bite the public very badly, and then the reputation of the PTs. Sincerely, a concerned Patient	4/22/2015 6:28 PM
265	Dry needling should be illegal.	4/22/2015 6:24 PM
266	They are not governed or licensed for internal procedures. This is a dangerous tool in the wrong and under trained and under supervised hands. As a registered nurse I find that this is a frightening course PT are undertaking.	4/22/2015 6:21 PM
267	the training is far too slight to provide for safety for patients	4/22/2015 5:21 PM
268	When needle penetrate the skin, this is called Acupuncture. That is the reason for me to go to school for 3 1/2 years to be licensed by the state to perform the needling.	4/22/2015 5:14 PM
269	They should not be allowed to practice Acupuncture without the many years of training required to be safe and effective	4/22/2015 4:49 PM
270	What you are actually suggesting here is acupuncture. As a consumer of both PT and acupuncture I'm wondering why the two can't work collaboratively instead of competitively. I think acupuncture should be left to acupuncturists.	4/22/2015 4:42 PM
271	totally unsatisfactory! the minimum number of hours is only 24...this is simply not enough to ensure the safety of the public! there are many, many things that can go wrong, both physically and energetically when putting needles in the body. you're barely skimming the tip of the iceberg of the potential things that can go wrong in a 24 hour course!	4/21/2015 10:51 AM
272	Recommend a specific number of course work hours (250hrs) and passing an exam prior to allowing a PT to practice dry needling. A weekend course is not sufficient training to perform dry needling	4/19/2015 11:32 AM
273	sorry no section A comment. I do feel that it is even more paramount that Physical Therapists become proficient at mobilization/manipulation of Spine and all related understanding and applied knowledge of Spine to be truly effective in this profession and, as well, to expand our horizons.	4/18/2015 9:02 PM
274	Qualifications to meet standards are clearly stated	4/14/2015 9:09 AM
275	Well, as the PT "Federation" and it's downward pyramid knows in the same way the Acupuncture Profession knows..... the so called skilled intervention dry needling /AKA ACUPUNCTURE, and the use of fine filiform needles /AKA ACUPUNCTURE NEEDLES undeniably equals the practice of "ACUPUNCTURE", and that all the propaganda that's repeatedly (so clever) used to mislead the public /including legislators, is nothing more than self serving deceitful and quite fraudulent to say the least. Trigger points are acupuncture points, and since anyone having acupuncture needles inserted into their skin to help with pain, etc, regardless of where on the body, that body experiences chemical, neuro chemical etc. changes. So called dry needling is undeniably nothing more than an aggressive acupuncture technique.... and anyone inserting acupuncture needles into living bodies regardless of what deceitful propaganda is used for untrained people's claims and rationalizations and business profit, should have professional integrity and regard for following national standards for the practice of acupuncture regardless of pretend labels such as IDN, DN, etc. etc. and including the term BioMedical acupuncture... after all that is the absolute and proper description of acupuncture. So no, as a consumer and as a health care professional, no way on earth are 24 ridiculous hours of training? adequate.	4/13/2015 7:48 PM
276	Appears adequate	4/13/2015 4:13 PM
277	Anyone who inserts filiform needles should be a licensed acupuncturist. Dry needling is a subset of skills within the scope of Acupuncture and can only be used safely and effectively by those who are adequately trained.	4/11/2015 2:25 PM
278	It is ridiculous to think that studying acupuncture points, location, actions etc can be done in 24 hours! And even more ridiculous to think that it can be practiced safely. Why not do a survey of the adverse events of LAc/LicAc vs PTs. I hope the results will open your eyes about the need for proper training and certification. Untrained PTs and Chiros cause many more pneumothorax injuries than LAc/LicAc	4/11/2015 10:17 AM

279	Dry Needling is acupuncture. Three years of training and education at a Masters level required to become a licensed acupuncturist. Safe guard the public. Stop the pneumothorax abuse. Get a degree in acupuncture if you want to do it.	4/11/2015 6:29 AM
280	very adequate	4/10/2015 6:25 PM
281	Do I have to take another DN course to meet the qualifications?	4/10/2015 5:56 PM
282	The total minimum contact hours of 24 hours is ludicrously inadequate to ensure PT does no harm and actually achieves benefits and health gains for consumer. Consumer better off seeing acupuncturist and PT should refer this out rather than presume they can adopt this modality with any efficacy or sane level of safety with just 24 hours of training. Acupuncturist training entails 1800 supervised clinical hours before completing their degree program and then they take a national board exam to further demonstrate their knowledge of how to safely and properly administer acupuncture. Dry Needling is acupuncture. Typical continuing education training is 15-24 hours so rather than being skillfully educated to properly perform and understand the nuanced and sophisticated effects of inserting needles and puncturing the skin, this ruling allows PTs to perform dry needling (using the very same needles used in acupuncture) with inadequate preparation and knowledge. Why? Simply being able to bill for the service is not justification to offer it. This ridiculously low training standard is sure to discredit the profession of physical therapists and put people at risk for severe and unnecessary injuries by unskilled PTs. A training minimum greater than that for MDs would take into account their anatomy and physiology training, but anything less than 1,000 hours of supervised clinical training makes a mockery of the elegant systems thinking associated with acupuncture for centuries and tells the public that their safety, comfort, and health outcomes mean less than the profit motive.	4/10/2015 3:51 PM
283	24 contact hours of education is a woefully inadequate number of hours to practice the art of Dry Needling! To learn the energetics underlying the trigger point being needled takes many many hours of study and practice. Shame on you!	4/10/2015 2:47 PM
284	24 hours vs 2400+ hours to become a licensed acupuncturist---preposterous!!!!	4/10/2015 2:11 PM
285	Dry needling is not a skilled intervention. It is a way for PT's to do acupuncture with out going to school and getting properly trained. I am an acupuncturist; I bet you don't want me doing PT techniques with just a weekend of training!	4/10/2015 1:50 PM
286	Persinal experience with dry needling in Corado was negative.	4/10/2015 11:36 AM
287	Who is going to monitor compliance?	4/9/2015 9:49 PM
288	seems comprehensive, will need o be update as time passes	4/8/2015 4:48 PM
289	I am satisfied with the timeline but will have issues with the specifics of the qualifications.	4/8/2015 12:40 PM
290	Courses taken before this ruling that meet the requirements set should count as well.	4/8/2015 10:53 AM
291	I think it's appropriate	4/7/2015 8:35 AM
292	Thorough	4/7/2015 6:43 AM
293	No specific comments	4/6/2015 10:07 PM
294	There are no provisions regarding those therapists who have successfully completed course work and have been practicing dry needling already. There is no information or research data references as to how these guidelines were determined.	4/6/2015 9:15 PM
295	The training and supervision requirement appears to be very minimal. I have studied several other states' laws, and some seem much more stringent (ex. Utah).	4/6/2015 7:31 PM
296	No clarity on foreign trained Physical therapists	4/6/2015 11:12 AM
297	I look forward to having more colleagues being able to practice dry needling and feel the stated requirements are appropriate for the use of this treatment intervention. I am also pleased to have so many great practitioners that helped to accurately define dry needling and the scope of conditions it can prove beneficial for.	4/5/2015 11:09 PM
298	sorry, I'm not real familiar with this issue	4/5/2015 7:34 PM

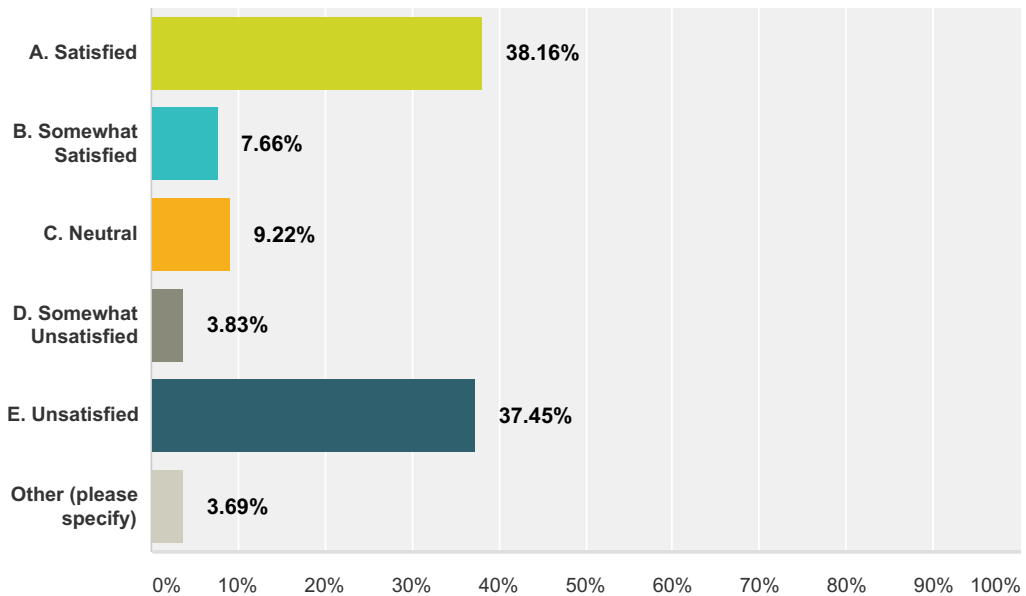
299	Here's my issue: It is my opinion that dry needling was already in the scope of practice of PT (it is a physical agent) and adding statutory language specifically for dry needling makes me, well "uncomfortable". I just think it is a slippery slope when we write statutory language for specific practice areas of physical therapy. Nonetheless, here we are and now the board must write rules. I think requiring a passing score on a written and practical examination is too strict, and I think 24 hours of course time is too much. The rules should be lightened up and made less restrictive. We need to believe in the professionalism of the individual PT to make his/her own determination of when they are ready to perform dry needling on patients.	4/5/2015 10:24 AM
300	I don't think that our profession should be performing this service.	4/5/2015 9:39 AM
301	if therapists are going to use this as a common modality it needs to be regulated.	4/4/2015 8:01 PM
302	I feel it is an acceptable requirement to be able to practice dry needling.	4/4/2015 10:53 AM
303	Will PT's already using dry needling require a written and practical exam to show the board?	4/4/2015 9:20 AM
304	it is not clearly stated that a test must be completed for all to demonstrate understanding of material and demonstrate techniques safely and effectively (this has not been developed , right? is it possible?) I do not know enough concerning this matter	4/3/2015 11:33 PM
305	It would be better if someone was a more experienced PT or had to take 2 classes for certification.	4/3/2015 11:19 PM
306	Since I am not involved with clients that may not be using this and I would not be training in it, I don't feel adequate to respond to all of this.	4/3/2015 11:04 PM
307	There should be a provision for people that were already practicing dry Needling prior to the rules taking effect in July 2014. All those courses can be grand fathered in and from that date all courses meet the full qualifications established in Paragraph (c).	4/3/2015 10:16 PM
308	Feel a more complete accupressure ed. would be necessary, not a canned system	4/3/2015 8:58 PM
309	I feel the multiple sticking of the skin with the same needle is asking for infection and law suits.	4/3/2015 8:31 PM
310	I think there should be a minimum years of practice as a therapist requirement prior to taking dry needling courses. 1-2 years would be ideal.	4/3/2015 7:53 PM
311	I am glad dry needling is being considered. I think there are a variety of programs that offer education in dry needling and that are already established. These programs should be accepted by the state board as qualified and completion of the courses should allow a therapist to begin the use of dry needling in the clinical setting. Like many skill sets, dry needling expertise requires time to develop, and therefore I do not agree with the need to complete a written and practical exam given by the state board before being allowed to utilize this skill in the clinical setting. Completion of an established program should be sufficient to allow use. The current standards of care, as written, are too stringent.	4/3/2015 6:08 PM
312	do you really think a PT is as qualified as an experienced acupuncturist to do dry needling after a weekend or weeklong course.	4/3/2015 5:36 PM
313	Will the standards be nationally accepted	4/3/2015 5:31 PM
314	I have a therapist who was certified in dry needling after Jan 1, 2014 who's competency was evaluated practically but not written. At the time, we did not know that a written test would be part of the certification criteria. We would hate to have to completely re-take the coursework just for that component and would love to see a clause in the rules to allow him to take the written portion separately. Otherwise, the rules look reasonable and well-thought out.	4/3/2015 4:47 PM
315	We as Physical Therapists understand the anatomical structures of the body better than most health care professions. The training with dry needling is safe and effective when provided by a therapist, regardless of the scare tactics that accupuncturists and chiropractors employ to convince the public on the contrary. They will sit on their high horse and criticize us publicly for doing what we are better equipped to do than they are. As Physical Therapists we can no longer sit back a passively take this line of BS from these professionals. We are trained properly. We are able to treat the public safely. We are able to do good for the public. Look at the research behind the dry needling before believing some lying remarks made by these other so called professionals. We as PTs are more effective in helping our patients and the dry needling skill enhances our abilities even further.	4/3/2015 1:56 PM
316	Earlier effective date?	4/3/2015 1:52 PM
317	Standards as defined is important to safety of pt and confidence from the public for FDN	4/3/2015 12:14 PM
318	Grandfather clause in draft	4/3/2015 12:05 PM

319	Will this allow enough time for Therapist to make sure their previous training meets the standards set in the document. If this is not released soon therapist may or may not have to get into further course work to meet the standards. Does this apply to therapist who completed training prior to Jan 1 2014 or are they grandfathered in? In either way there needs to be ample time for a therapist to be able to meet the guidelines by July 1, 2015 so that care of patients is not interrupted.	4/3/2015 11:17 AM
320	The duration of time to which this has been put off, July 1 2015, has had a negative effect on patient care in the state of AZ.	4/3/2015 10:22 AM
321	I don't feel 24 hours of contact education is required. Maybe half of that would suffice.	4/3/2015 9:22 AM
322	Trying to teach acupuncture and regulate it.	4/3/2015 9:11 AM
323	no comment	4/3/2015 8:48 AM
324	Kinetacore training is the best for dry needling	4/3/2015 8:19 AM
325	Why so much involvement of the APTA. Not all PTs belong to the association or agree with their practices.	4/3/2015 8:14 AM
326	As a profession, we want to ensure all Physical Therapist are appropriately educated and demonstrate competency in order to secure the most effective treatment for our patients and to safeguard the public	4/3/2015 7:33 AM
327	New courses will obviously ensure that all the stipulations of paragraph C are met. For those that took a course that may have not contained all of these stipulations, where are the accommodation or mandates described?	4/3/2015 6:45 AM
328	I do not know enough about dry needling to respond.	4/2/2015 10:50 PM
329	Board has been lame in the handling of this issue. Several PTs have been prevented from using this training due to the arbitrary nature of setting a cut off date for practicing this skill Consistent with how the board operates	4/2/2015 10:10 PM
330	vague	4/2/2015 10:07 PM
331	I believe properly trained physical therapists are capable to provide safe and effective treatment through dry needling	4/2/2015 9:45 PM
332	It looks exactly from Kinectacore course FDN1.	4/2/2015 9:44 PM
333	If courses taken before July 1, 2015 do not meet the criteria for dry needling, courses must be retaken	4/2/2015 9:22 PM
334	24 hours is not something that can typically be done in one CE course even if it's 2-3 days long. Is 24 hours a specific time requirement or could that number be reduced in order to allow a therapist to become certified without having to spend multiple weekends/weekdays at the course?	4/2/2015 8:45 PM
335	Fully agree but want to ensure those therapists already performing this technique who have had proper training should be grandfathered in.	4/2/2015 8:31 PM
336	PTs should not provide dry needling services	4/2/2015 8:24 PM
337	No comment	4/2/2015 7:27 PM
338	While the contact hours required seem appropriate I wonder about the practicality of the written and practical exam. Who would be deemed qualified to give the exam? What about other treatments that PTs provide after course work that don't require that type of exam?	4/2/2015 7:16 PM
339	This seems reasonable enough to me	4/2/2015 7:12 PM
340	I am extremely satisfied that this is occurring. However, I am frustrated that our profession was forced to jump through additional hoops to obtain this. Thank you for your hard work.	4/2/2015 7:06 PM
341	If effective July 1st, what are the implications for those currently practicing dry needling who have completed level 1 courses, but not yet level 2?	4/2/2015 6:51 PM
342	I am curious as to therapists who have completed courses prior to July 2014 which met all of the above requirements with the exception of the examination process.	4/2/2015 6:40 PM
343	written exam should not be required.	4/2/2015 6:14 PM
344	Based on the definition anyone that took a course that includes all the criteria but took the course between January 1, 2014 and July 1, 2014 would not be covered under the statute.	4/2/2015 6:08 PM
345	Please specify when you can take the coursework- can you take it now or do you have to wait after July 1, 2015 for it to count?	4/2/2015 6:05 PM

346	As written, I think the regs are adequate. Given my experience in Maryland with the Accupuncture society, AZ must resist any association of dry needling to Accupuncture. Continue to describe it as a western technique that is based upon a knowledge of anatomy and physiology for proper placement of needles to ensure the saftey of the patient.	4/2/2015 5:44 PM
347	A) unnecessary and onerous for protection of the public or for ensuring competence of physical therapists in performing this procedure. Guidelines ensuring that physical therapists perform in an competent and ethical manner are explicitly required elsewhere in the regulations.	4/2/2015 5:38 PM
348	It all seems fair	4/2/2015 5:38 PM
349	I think education should have minimum number of hours and more specific information about education on the needling itself. Most PTs have a great knowledge of anatomy already and of blood born pathogens. It should also include theoretical/physiological underpinnings of the techniques	4/2/2015 5:37 PM
350	24 hours of training seems a bit much considering the amount of education we have as DPTs.	4/2/2015 5:29 PM
351	It is special skill which requires extra education and understanding of skill	4/2/2015 5:29 PM
352	I believe a therapist should have training for dry needling but I am concerned about the need for such a requirement for all the interventions that we provide.	4/2/2015 5:23 PM

Q5 Please describe your satisfaction with Section B of the draft rules. Section B. B. A PHYSICAL THERAPIST OFFERING TO PROVIDE OR PROVIDING “DRY NEEDLING” INTERVENTION SHALL PROVIDE DOCUMENTED PROOF OF COMPLIANCE WITH THE QUALIFICATIONS LISTED IN PARAGRAPH (C) TO THE BOARD WITHIN 30 DAYS OF COMPLETION OF THE COURSE CONTENT IN PARAGRAPH (C) OR WITHIN 30 DAYS OF INITIAL LICENSURE AS A PHYSICAL THERAPIST IN ARIZONA.

Answered: 705 Skipped: 111



Answer Choices	Responses	Count
A. Satisfied	38.16%	269
B. Somewhat Satisfied	7.66%	54
C. Neutral	9.22%	65
D. Somewhat Unsatisfied	3.83%	27
E. Unsatisfied	37.45%	264
Other (please specify)	3.69%	26
Total		705

#	Other (please specify)	Date
1	physical therapists should not be able to do dry needling.	5/2/2015 9:33 PM
2	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:18 PM
3	They need far more training than the program will provide.	5/2/2015 4:24 PM
4	It should never get to this point	5/2/2015 7:41 AM
5	Horrified	5/1/2015 9:27 PM
6	horrified	5/1/2015 7:27 PM
7	Too little training	5/1/2015 6:25 PM
8	irrelevant	5/1/2015 5:44 PM
9	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:25 PM
10	PTs need to follow acupuncturist guidelines and hours of training	5/1/2015 3:48 PM
11	they are not qualified	4/30/2015 4:42 PM
12	Again, horrified!	4/24/2015 12:03 AM
13	inadequate training	4/23/2015 9:00 PM
14	proposed qualifications are not enough	4/23/2015 5:27 PM
15	does one go to a Dentist for shoulder surgery?	4/22/2015 9:13 PM
16	Dry needling is acupuncture without proper training.	4/22/2015 6:25 PM
17	If a course was taken during Jan 2014 and current timeframe, the Therapist is unable to perform dry needling based on legislature. Therefore, it should be stated that the dry needling compliance qualification should be submitted at this time of ruling AND/OR (section B from above).	4/21/2015 10:46 PM
18	lol	4/13/2015 7:51 PM
19	Why should the PT have to send this in ?	4/4/2015 7:20 PM
20	See number 6	4/3/2015 10:01 AM
21	it should just happen before we perform dry needling techniques	4/3/2015 8:20 AM
22	why within 30 days of the course content? just be compliant & current	4/2/2015 10:12 PM
23	Creates a new burden of reporting and recording for the Board of PT. The Board does not require this in any other area of advanced clinical practice.	4/2/2015 8:28 PM
24	Satisfied unless it does not grandfather in those who took classes after January 1 2014	4/2/2015 6:24 PM
25	Again, proceed with the present rules and Grandfather in those who took the courses prior to the deadline.	4/2/2015 5:37 PM
26	not sure	4/2/2015 5:31 PM

Q6 Please provide any comments regarding Section B.

Answered: 246 Skipped: 570

#	Responses	Date
1	They have not done the years of training it takes to do proper acupuncture. The public will think ineffective dry needling us acupuncture	5/2/2015 11:01 PM
2	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:18 PM
3	The education requirement is inadequate and a Masters of Acupuncture Studies should be the educational requirement	5/2/2015 8:05 PM
4	Only MD's and Acupuncturists with required thousands of hours training should be the only ones using needles within the skin. You are putting the publics saftey at risk.	5/2/2015 5:26 PM
5	Inadequate training length & depth.	5/2/2015 5:12 PM
6	This is nowhere near the amount of eastern education needed to understand the intricacies of Chinese medicine.	5/2/2015 5:05 PM
7	stop this bill now.	5/2/2015 4:24 PM
8	If there are License for Acupuncturists in the State of Arizona, how can a PT do "Dry Needling" which is putting ACUPUNCTURE NEEDLES into a person's body? Let the PTs go to Acupuncture School.	5/2/2015 3:48 PM
9	The course content and training is not enough to allow PTs to practice so called dry needling.	5/2/2015 3:36 PM
10	More education needs to be required.	5/2/2015 3:35 PM
11	Better than nothing, but please see my comments from Section A.	5/2/2015 3:07 PM
12	Even worse. See the previous pages comments. This is even scarier.	5/2/2015 3:04 PM
13	Regardless of documentation, this is not enough training for performing this procedue	5/2/2015 3:03 PM
14	The 24 hours of training is insufficient, so compliance with it would not be helpful to the public's safety.	5/2/2015 2:53 PM
15	Again, the so called "qualification" requirements currently listed by the draft rules are lacking.	5/2/2015 2:40 PM
16	This is not sufficient training	5/2/2015 2:39 PM
17	They lack the proper acupuncture training to conduct this form of therapy.	5/2/2015 2:07 PM
18	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:06 PM
19	Where is your clean needle technique course	5/2/2015 1:03 PM
20	Same as above, inadequate qualifications.	5/2/2015 11:29 AM
21	Proof is important but I don't believe this is enough education to receive any qualifications.	5/2/2015 11:18 AM
22	What you should be providing is proof that you attended a rigorous program where you completed clinical hours under a licensed acupuncturist.	5/2/2015 10:12 AM
23	Amount of training not sufficient for safety or proficiency.	5/2/2015 10:10 AM

24	Physical Therapist training is not anywhere near the same training as "dry needling". ACAOM - The Accreditation Commission for Acupuncture and Oriental Medicine is a Commission is an independent body that evaluates first professional master's degree and professional master's level certificate and diploma programs in acupuncture, first professional master's degree and professional master's level certificate and diploma programs in Oriental medicine. 24 hours of training is not sufficient and is dangerous to the patient.	5/2/2015 10:06 AM
25	There are risks to performing "dry needling" this should not be allowed without necessary hours of training which most acupuncture programs are 2000-3000 hours including supervised internship. It is not advisable to allow someone to practice a medicine they know very little about. In most situations one cannot practice even one day without a license.	5/2/2015 10:04 AM
26	Proof of compliance should be provided and vetted before such qualification is added to the license.	5/2/2015 9:49 AM
27	Providing proof of training is satisfactory, but again, the level of training shown is insufficient for public safety.	5/2/2015 8:59 AM
28	Needling should be done by licensed acupuncturists?? Can an acupuncturist take a 24 course and be a physical therapist?	5/2/2015 8:46 AM
29	Again, There is no continuing education course that can safely teach a profession with no skill set in the insertion of needles into the body to suddenly obtain this skill set.	5/2/2015 8:29 AM
30	Does nothing to protect the public.	5/2/2015 8:23 AM
31	Please refer to question a	5/2/2015 7:55 AM
32	The course content is at least 1,000 hours short of being acceptable to preform "dry needling" acupuncture.	5/2/2015 7:45 AM
33	Dry needling is especially performing acupuncture and should be labeled and treated as such . It is like allowing PTs to do "bone adjustment" when they are doing what is in scope for chiropractic with a mere 24 hrs of training.	5/2/2015 7:42 AM
34	I do not think that PT's should be certified with such little training.	5/2/2015 7:41 AM
35	This is not enough training!	5/2/2015 7:40 AM
36	Should only be licensed acupuncturist ..!!	5/2/2015 7:17 AM
37	Very little training	5/2/2015 7:09 AM
38	Acupuncture requires a MS or Doctorate level degree	5/2/2015 4:09 AM
39	Again, not enough education (hours & content for clinical experience). Period.	5/2/2015 12:44 AM
40	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's	5/2/2015 12:44 AM
41	24 hours is unacceptable.	5/2/2015 12:23 AM
42	Course requirements are not adequate.	5/1/2015 11:06 PM
43	So dangerous	5/1/2015 10:56 PM
44	The training course for dry needling is far far too basic, and puts patients at great risk of injury. No PT should practice acupuncture unless he or she is also a LAc.	5/1/2015 10:49 PM
45	PT's should not be performing acupuncture with out a license to practice acupuncture. "Dry Needling" is a technique in acupuncture. Calling it another name doesn't negate the fact that it is acupuncture.	5/1/2015 10:48 PM
46	Again, Section C is the problem. Section B is referring to C. As per the 30 days notification - I do not approve of C to begin with.	5/1/2015 10:27 PM
47	24 hours of training is so low compare to 1000s of hours that acupuncturist received. Without proper training, this will post a threat to the public!	5/1/2015 10:22 PM
48	This entire idea falls woefully short. Why do you want to put innocent people at risk?	5/1/2015 10:20 PM
49	Physical therapy is physical therapy. Acupuncture is much different and has much more to offer. Dry needling should be left to acupuncture physicians for the highest good of patients. There is much more involved than putting needles in painful areas. Do not dilute this powerful medicine.	5/1/2015 9:57 PM
50	I believe the documentation should be required, yet it is still for inadequate level of safe training.	5/1/2015 9:53 PM
51	This is a terrible, terrible idea.	5/1/2015 9:48 PM

52	See comments on section a	5/1/2015 9:43 PM
53	PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:30 PM
54	Acupuncturists have state and national license exams and thousands of hours of study and contact time.	5/1/2015 9:27 PM
55	If the Arizona PT Board is to allow Physical Therapists to use "dry needling", the board should receive proof of this (inadequate) training prior to a Physical Therapist's using this modality. Most importantly, it should be clearly communicated to patients that not only is "dry needling" not acupuncture but also that the hours required by the Physical Therapy board do not meet even the lowest standards for an Acupuncturist.	5/1/2015 9:22 PM
56	What is being called Dry Needling is actually the practice of Acupuncture. Anyone who wishes to perform these services should be held to the same standards as a Licensed Acupuncturist in the State of AZ. Anything less is dangerous and unsatisfactory.	5/1/2015 9:10 PM
57	Education is completely insufficient to provide the PT with enough training to reduce and eliminate the risk of harm to the patient, especially pneumothorax. Similar techniques used by other healthcare professions require significantly more training and documentaion of training. For example, Acupuncturists are required to have over 1,000 hours of clinical training and pass a national board exam in order to practice in the state of Arizona.	5/1/2015 9:06 PM
58	Dry needling is not within the scope of the physical therapy profession. Acupuncturists are already qualified and certified to safely perform the procedure. All patients that require the intervention should be referred to an acupuncturist.	5/1/2015 8:43 PM
59	It seems a given they should have to have proof, but it means very little without adequate training behind the use of needling. Some PTs and some of the protocols I've seen are very risky, rigorous and intense and al too often performed improperly.	5/1/2015 8:36 PM
60	Please do not risk patient's health and safety, and undermine the profession of those trained adequately.	5/1/2015 8:22 PM
61	Not enough training required.	5/1/2015 7:59 PM
62	"Dry needling" with the minimal amount of training should be avoided in the first place.	5/1/2015 7:38 PM
63	N/A	5/1/2015 7:36 PM
64	30 days...seriously? You would let someone 'dry' needle you after they have had 30 DAYS of training?	5/1/2015 7:27 PM
65	Physical therapists should perform PT and refer to qualified professionals for needle work. The patient should be allowed to receive treatment from the best qualified practitioner. 24 hours is pathetic.	5/1/2015 7:21 PM
66	You have not received appropriate training.	5/1/2015 7:13 PM
67	The therapist should be "obligated by law" to provide proof of training vs "offering"	5/1/2015 6:34 PM
68	Please see comments in Section A.	5/1/2015 6:30 PM
69	Too little training	5/1/2015 6:25 PM
70	Dry needling is the same as acupuncture under another name and lobbying effort	5/1/2015 6:20 PM
71	They shouldn't be allowed to needle someone.	5/1/2015 6:18 PM
72	Why are physical therapy associations suddenly experts in how to insert needles into a patient? What is their expertise that allows them to approve or disapprove course content?	5/1/2015 6:15 PM
73	Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason.	5/1/2015 6:12 PM
74	Unsatisfied with section c	5/1/2015 6:12 PM
75	Proving inadequate training does not make 'dry needling,' acceptable.	5/1/2015 6:06 PM
76	They should provide documented proof that they have a masters in Acupuncture & East Asian Medicine. That is the only time it should be allowed that a Physical Therapist be able to do Dry Needling/Acupuncture (yes, they are the same thing.)	5/1/2015 6:03 PM
77	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:57 PM

78	To be quite clear, the act of inserting an acupuncture needle into the body, under any pretense, or for any purpose whatsoever, is the practice of acupuncture. "Dry needling" is far outside both physical therapists' scope of practice and their scope of education and training. In most states, to become a licensed acupuncturist, an applicant must complete a minimum of 1,905 hours of education and supervised clinical training (1,245 hours of education and 660 hours of supervised clinical training). Yet you are wanting physical therapists who are not licensed by law to practice acupuncture are inserting acupuncture needles (up to four inches or more in length) into unsuspecting patients with 24 hours of training!!!!?? "Dry needling" was first described over 2,000 years ago in China's earliest and most comprehensive extant medical treatise, the Yellow Emperor's Inner Classic (Huangdi neijing), where it discusses in detail using tender or painful points, also known as "trigger points" or "motor points," to treat pain and dysfunction, particularly of the neuromusculoskeletal system. Simply described, "dry needling" involves inserting an acupuncture needle into a tender or painful point and then appropriately manipulating (rotating and/or pistoning) it for therapeutic purposes. The Food and Drug Administration (FDA) classified acupuncture needles as Class II medical devices subject to strict regulations under the federal Food, Drug, and Cosmetic Act (FDCA) and FDA's regulations. Individuals purchasing or receiving acupuncture needles who are not licensed by law to practice acupuncture are directly violating both civil and criminal provisions of the FDCA intended to protect public safety. 21 U.S.C. § 331(a)-(c), (g). These include the FDA's requirements that acupuncture needles can only be sold to "qualified practitioners of acupuncture." 61 Fed. Reg. 64616 (December 6, 1996). FDA prescription labeling requirements themselves specifically prohibit the sale of acupuncture needles to anyone who is not a qualified practitioner of acupuncture. The required FDA prescription labeling on the package from which acupuncture needles are to be dispensed states: "Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the States." 21 CFR § 801.109(b)(1) (emphasis added). Any individual who is not licensed by law to practice acupuncture is directly violating the FDCA and FDA's civil and criminal prohibitions when they purchase or receive acupuncture needles for use in "dry needling."	5/1/2015 5:45 PM
79	Irrelevant if section A remains as currently proposed	5/1/2015 5:44 PM
80	Require over 1,000 hours of training	5/1/2015 5:40 PM
81	If physical therapist are going to be trained in doing acupuncture with minimal hours they should have to state that distinction to their patients. In the case there wasn't enough practice or training and an accidents or incidence occurred and someone was injured or not helped ,their work should not be compared to an acupuncturist.	5/1/2015 5:37 PM
82	The qualifications listed in paragraph (c) are inadequate.	5/1/2015 5:34 PM
83	Please see previous response.	5/1/2015 5:32 PM
84	Acupuncturist in CA receive over 1000 hrs of training for needle insertion. I do not believe this small amount of training is sufficient to prevent harm to patients as evidenced my many recent complaints involving pnemothorax with dry needling.	5/1/2015 5:29 PM
85	Documentation of training in a technique should always be on record with any licensing board.	5/1/2015 5:26 PM
86	A full four year degree should be required of any practitioner.	5/1/2015 5:26 PM
87	Same comment as for previous question.	5/1/2015 5:14 PM
88	I don't think the "qualifications" are stringent enough.	5/1/2015 4:55 PM
89	should not provide service until the state has been made aware that they have completed the training	5/1/2015 4:53 PM
90	dry needling is not in the scope of physical therapy and should not be permitted to offer this service.	5/1/2015 4:52 PM
91	No Acupuncture training is 4 years of education not 24 hours. Who do you think you are?	5/1/2015 4:41 PM
92	In order for a PT to provide dry needling, they need to be licensed and board certified by the NCCAOM.	5/1/2015 4:40 PM
93	disagree w/everything! not enough training!!!	5/1/2015 4:32 PM
94	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:25 PM
95	Dry needling is acupuncture!! And by no means should a PT offer acupuncture!	5/1/2015 4:21 PM
96	how can you compare 24 hour training versus 2000 hours of acupuncturist you cannot	5/1/2015 4:03 PM
97	I do not believe PT's should preform dry needling with less than 2000 hrs. of education.	5/1/2015 3:48 PM

98	24 hours is NOT a sufficient amount of training for a PT to perform acupuncture (dry needling). As a Licensed Acupuncturist myself, I was required to obtain over 1,000 hours of training. Therefore I feel there is a serious public safety concern due to their lack of education and training in needling. I feel it would be in the best interest of consumers/patients to require more training for PTs who wish to needle.	5/1/2015 3:32 PM
99	Again "dry needling" or acupuncture should be done by a trained acupuncturist. Not a PT. A person must know the medicine before doing this or it can hurt the patient. Have a referral program.	5/1/2015 1:47 PM
100	not enough training - even an MD is required to have 200 hours of training	5/1/2015 1:10 PM
101	Not allow	5/1/2015 12:44 PM
102	Again, the amount of hrs of education is dramatically insufficient for proficiency and could be damaging	5/1/2015 2:09 AM
103	A physical therapist using acupuncture needles and doing "dry needling" is in fact performing acupuncture without adequate licensure and training.	4/30/2015 10:13 PM
104	The documented proof is a joke since the requirements are dangerously inadequate.	4/30/2015 9:47 PM
105	Unfortunate that PT's and their Board do not understand the reality of this untenable situation.	4/30/2015 8:27 PM
106	Not very specific about what the documentation is nor the actual course content.	4/30/2015 8:18 PM
107	24 hours is not enough training and you are endangering the public by allowing PT's to do this with less than 800 hours of training.	4/30/2015 7:42 PM
108	See my response to Section A	4/30/2015 7:09 PM
109	You are delusional if you think this qualifies anyone to do "dryneedling".	4/30/2015 4:42 PM
110	as stated before, training is inadequate and puts patients at risk	4/30/2015 2:47 PM
111	Allowing a Physical Therapist to needle is like allowing an acupuncturist to perform a surgery. The Physical Therapist should not be needling unless they are a licensed acupuncturist.	4/30/2015 2:03 PM
112	Why is the AZ State Board of Physical Therapy doing this/ When acupuncture being performed by masters of this medicine all around the entire state. Referring their patient's to a qualified practitioner and avoiding malpractice in their business- would be so much more logical. Then I would guess it must be an income generator- not to benefit the healing of their patients!	4/30/2015 11:44 AM
113	I do not feel comfortable with the truncated acupuncture training that a physical therapist can have to needle an individual	4/30/2015 9:20 AM
114	This is not adequate training, so this should not even be discussed.	4/30/2015 2:04 AM
115	This education is grossly negligent and harmful to patients	4/30/2015 12:20 AM
116	No comment	4/28/2015 10:30 PM
117	This is a worthless document if the physical therapist has not undergone sufficient training as is outlined in the AZ Acupuncture BOE and the NCCAOM.	4/26/2015 5:45 PM
118	not enough training	4/24/2015 8:32 PM
119	I think they should be required to intern and be observed.	4/24/2015 6:36 PM
120	The point of a governing board is to establish scope, safety and answer questions the consumer does not know to ask. Most people do not know how much training a licensed acupuncturist has prior to obtaining a license. 24 hours vs. 3000hours is something the board needs to be aware of and vigilantly honor so that the consumers are protected and get the care they need and deserve.	4/24/2015 5:50 PM
121	The medical board should oversee this and AMAA required courses	4/24/2015 4:48 PM
122	Without the proper 3,000 hour training in acupuncture, a PT should not be able to utilize it.	4/24/2015 4:10 PM
123	Unless they have completed the full training of a licensed acupuncturist they should not be doing this.	4/24/2015 3:23 PM
124	The training is insufficient.	4/24/2015 2:45 PM
125	the qualifications are not enough education. arizona's laws are insufficient as well....it's a fail to use them as a role model	4/24/2015 1:46 PM

126	The qualification standards quoted are not sufficient to safely and successfully practice acupuncture (which is defined by using an acupuncture needle, which dry needling does).	4/24/2015 12:58 PM
127	Physiotherapists are not trained well enough and they don't deserve to take food away from my children. I have 11 kids	4/24/2015 12:25 PM
128	Standards and competency should have been developed before practicing. I do not agree with these current standards being discussed. 24 hours is not enough training to be competent enough to practice on the public.	4/24/2015 10:49 AM
129	see prior comment	4/24/2015 10:42 AM
130	No comment	4/24/2015 1:04 AM
131	Providing proof of subpar instruction time does not need official validation because it is subpar!	4/24/2015 12:36 AM
132	A 24 hour course is totally inadequate to train anyone for Acupuncture.	4/24/2015 12:03 AM
133	Physical therapists should not be allowed to perform "dry-needling".	4/23/2015 10:24 PM
134	Where is the clean needle training. Where is the safety? Where is the understanding of what they are doing? It takes longer than a weekend to learn Acupuncture (dry needling)	4/23/2015 9:00 PM
135	a physical therapists should have as much training as an acupuncturist, and pass the boards to be qualified to do acupuncture. In any way shape or form, dry needling is acupuncture with little to no training.	4/23/2015 8:33 PM
136	Go to acupuncture school	4/23/2015 8:32 PM
137	Acupuncture is not in P.T. scope of practice. Dry needling is acupuncture. You are breaking the skin.	4/23/2015 5:27 PM
138	I am opposed to PTs practicing needling of any kind without training in the field of acupuncture	4/23/2015 2:57 PM
139	this will mean zero to the public, who will not know better	4/23/2015 9:10 AM
140	Physical therapists who do not have 2,400 contact hours, not 24 should not be needling patients. Do what you are trained appropriately to do.	4/23/2015 8:29 AM
141	For all other certifications nothing is turned into the boards. I think it should remain as an audit item.	4/23/2015 8:00 AM
142	These educational requirements are a joke and will lead to patients being hurt.	4/23/2015 7:47 AM
143	Same as my previous comment PTs should not perform Dry Needling (unless you allow massage therapist to perform physical therapy?)!!!	4/23/2015 6:42 AM
144	Again, ridiculously small qualifications for "dry needling"	4/23/2015 5:49 AM
145	No theory?	4/22/2015 10:44 PM
146	The course content is insufficient. It's like saying that you have to take a weekend course to do surgery, but you also have to submit proof of that weekend course within 30 days.	4/22/2015 10:14 PM
147	What CEU's are required. The statistics on the efficacy of PT's performing acupuncture should be compared to those performing acupuncture and their safety outcomes (in the U.S.).	4/22/2015 9:40 PM
148	Compliance with listed qualifications do not ensure public safety or practitioner competency	4/22/2015 9:23 PM
149	They should be required to show the documentation BEFORE providing any needling services.	4/22/2015 9:20 PM
150	The "Dry Needling is another smoke and mirrors name for Acupuncture.	4/22/2015 9:13 PM
151	Again, not enough training to be safe.	4/22/2015 9:05 PM
152	The training (usually a weekend workshops) in Dry Needling is very deficient. Dry Needling should be taught in the Masters Programs that are given in the PT Curriculum at the Universities, not some weekend add-on training. If a PT wants to become a Dry Needling professional they should take this training only at or given by a Master's program. (Does a program that includes Dry Needling even exist at our PT Program in Flagstaff at this time? Are they even willing to teach it? If not, why not?) Also, where in this draft does it indicate that the PT has to have x many hours in trigger point identification? My understanding from my PT is that the needling points are at and into the trigger points.	4/22/2015 6:44 PM
153	Acupuncture requires an understanding of organs and channel theory. This will be ineffective use of this tool and allowing people to practice well outside their scope.	4/22/2015 6:23 PM

154	Physical therapist should go to school to receive the formal education to perform acupuncture (so called dry needling) , so they will not endanger the public health.	4/22/2015 5:15 PM
155	Same as my previous comment--leave acupuncture to the acupuncturists and PT to the PTs.	4/22/2015 4:43 PM
156	shouldn't it be immediately? or at the very least, before putting needles in patients and putting them at risk?!?!	4/21/2015 10:52 AM
157	I do not feel that dry needling is an exception to the rule of meeting a standard of care in regards to using any modality, etc. PT's are professionals that are required to understand and comply with the rules and practice set in the profession and by the state board. I do understand however that dry needling has yet to become a modality regular tight in PT programs in the US and this is an effort to regulate it, as forced by other providers in the state of AZ.	4/19/2015 9:45 PM
158	Or within 30 days of legislature allowing performance of dry needling if trained between January 2014 and July 2014.	4/17/2015 8:13 AM
159	Along with the documented proof, there should be a registration fee associated with the application. This costs the state to process this so a fee should be administered.	4/14/2015 9:10 AM
160	Section B is comical. As if this item means anything or changes anything. Just another pretend formality.	4/13/2015 7:51 PM
161	Dry needling is acupuncture. It should not be allowed in the scope of practice of PTs	4/11/2015 10:18 AM
162	Do I have to send in my course information if I have been practicing DN before jan 1, 2014?	4/10/2015 5:57 PM
163	24 contact hours of education is a woefully inadequate number of hours to practice the art of Dry Needling! To learn the energetics underlying the trigger point being needled takes many many hours of study and practice. Shame on you!	4/10/2015 2:47 PM
164	What about those PTs who were trained before January 2014 and have been able to continue Dry Needling throughout this process?	4/10/2015 2:23 PM
165	Does this mean that those PTs that are doing "dry needling" need to re-take the course or provide documentation of completing a course before the rule was in place? What would be the prior qualifications needed?	4/10/2015 2:18 PM
166	a professional acupuncture license should be required	4/10/2015 2:12 PM
167	I don't think PTs have enough experience.	4/10/2015 11:37 AM
168	how does this cover foreign-trained who may have been doing dn for 20 years prior? no foreign-trained therapists allowed to practice?	4/10/2015 9:44 AM
169	Why do we have to keep going forward to Paragraph C in order to answer these questions?	4/9/2015 9:52 PM
170	prior to providing the intervention?	4/9/2015 11:40 AM
171	Courses taken before this ruling in 2014 that meet the requirements set should count as well.	4/8/2015 10:54 AM
172	Does this mean that when a course is completed, support documentation of completion needs to be sent to governing board or available if asked for?	4/8/2015 12:42 AM
173	Appropriate	4/7/2015 8:36 AM
174	No specific comments	4/6/2015 10:07 PM
175	Again, no reference to those therapists already practicing dry needling.	4/6/2015 9:16 PM
176	What about foreign trained therapists?	4/6/2015 11:12 AM
177	With respect, I do not agree with the requirement of sending documented 'proof' of compliance with qualifications listed in paragraph C. As a professional and licensed Physical Therapist, I strongly feel that we can monitor our CEU's at every level. We are not requested/required to submit documentation for HVLA spinal manipulations or Graston/IASTM type techniques or any other certifications that we may have unless we are audited.	4/6/2015 10:42 AM
178	30 days is a relatively short period of time - may consider 60 days	4/6/2015 10:06 AM
179	To my knowledge it is not the standard to provide proof of competency to the Board prior to completing an intervention. Will the Board be providing in return additional designation to the PT as evidence to patients, employers and 3rd party payors this has been completed?	4/6/2015 9:33 AM
180	30 days would not applied to those certified in 2014. Would those people just mail proof of course content?	4/6/2015 9:26 AM

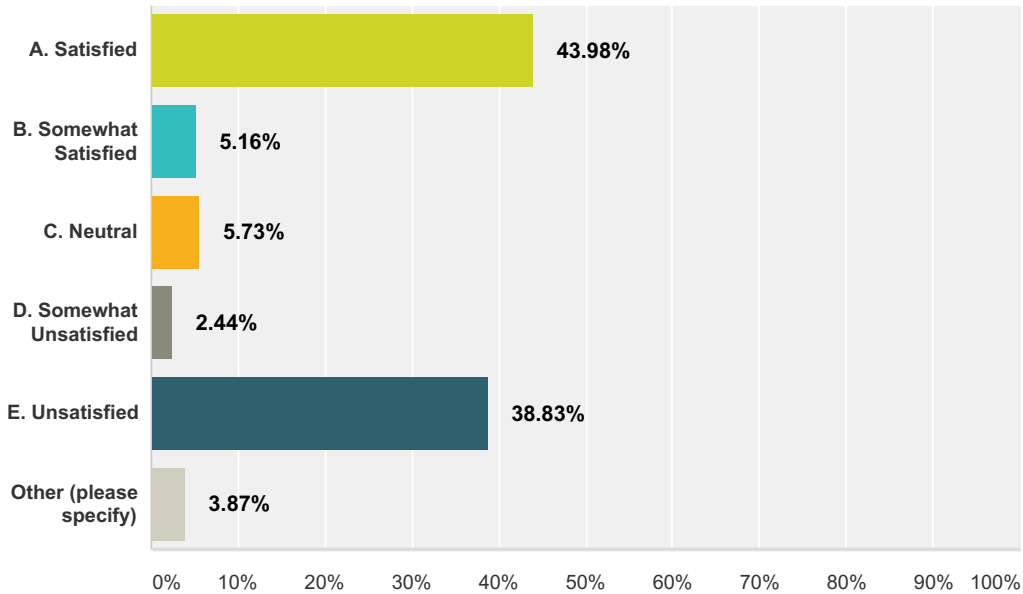
181	Ditto section A	4/5/2015 9:40 AM
182	would a course completion certificate be sufficient enough, or would there need to be a copy of the course content outline or something more formal from the instructor?	4/5/2015 7:54 AM
183	This feedback is coming from someone who was certified in Dry Needling after Jan 2014. As I take this survey, I am applying it to myself and situation. 30 days seems adequate although is not beneficial for those in this unique circumstance.	4/5/2015 7:50 AM
184	this modality is more invasive than electrical stimulation and ultrasound and should require documentation of qualification	4/4/2015 8:02 PM
185	What about for those who received the training a few years ago? Is it OK to send this info in July 2015?	4/4/2015 7:29 PM
186	Why not have it when ordered by the board.	4/4/2015 7:20 PM
187	Will taking a class 2 years prior to July 2015 count as long as it has met the standardized requirements?	4/4/2015 5:20 PM
188	Agreed	4/4/2015 10:54 AM
189	If licensed in the state for years, will the therapist still require this documented proof?	4/4/2015 9:22 AM
190	Having the Physical Therapist post their Dry Needling certificate similar to posting their Licensure may be beneficial at their practice site	4/4/2015 9:22 AM
191	why does there need to be such a short amount of time needed to document compliance once course is completed? This might not allow time for some to complete testing successfully after course is completed.	4/3/2015 11:37 PM
192	Does the Board approve of this certification in written prior to the practitioner practicing?	4/3/2015 10:20 PM
193	What happens to the people who took a course and began dry needling between January 2014 and the time the board had people stop? Will they need to re-take the class and show competency?	4/3/2015 9:40 PM
194	What guidelines are there for those of us that have been practicing prior to January of 2014? I took my training in 2011.	4/3/2015 7:54 PM
195	Does this mean that the Board will issue some sort of addendum to the therapist's licensure once that proof is submitted? This is an unprecedented step in modifying our scope of practice and I feel it sets the stage for other professions to pressure the Board to add similar conditional statements to the practice act.	4/3/2015 4:30 PM
196	It is confusing to me with the 30 day rule, is it 30 days within completion of the course or of the rule being made? That is one part of the document that I would clear up.	4/3/2015 2:46 PM
197	I agree that there needs to be a standard as far as education for TDN. As professionals it is our duty to then follow the rules, I don't think it's necessary for the government to then collect the proof. Perhaps intermittent audits could be used.	4/3/2015 2:34 PM
198	Why does the board need this? This sounds like caving in to pressure from lawyers. In no other techniques or CEU certifications that we receive are we required to submit to the board our qualifications.	4/3/2015 1:58 PM
199	We do not do this for any other treatment modality. I realize dry needling is more invasive but this may set a bad precedent in my opinion. From a legal standpoint, I can see the need for this language. Hence why i checked neutral.	4/3/2015 1:22 PM
200	I am previously certified. Do I need to submit proof of compliance w/ qualifications? It was through kineticcore.	4/3/2015 12:15 PM
201	why are we requiring Dry Needling courses to submit proof of compliance when we do not require other courses to submit compliance. Shouldn't an "Approved" course be sufficient to practice?	4/3/2015 11:19 AM
202	A DPT does not need to provide any other type of post doctoral certification to the board. Why this one?	4/3/2015 10:23 AM
203	I believe completion of class and testing should be adequate. The therapist should keep appropriate documentation of course completion and dry needling exam results but I do not think they should have to notify the board of proof.	4/3/2015 10:20 AM
204	My question is whether there will be a response from the board (i.e. certification etc) verifying a clinician is allowed to practice.	4/3/2015 10:09 AM

205	This language does not identify the action that should be taken by those who have already been practicing dry needling in the state of Arizona or those who took a course after the initial January 2014 guideline but have been waiting to practice officially until these rules were established. Obviously the course date was greater than one months time. What is the timeline in which they need to submit there proof of competency?	4/3/2015 10:01 AM
206	I am assuming this allows those that have taken courses over 30 days ago time to submit their certificates of completion to the board. We will need to send in syllabus or just a cert of completion for the courses?	4/3/2015 9:47 AM
207	Time limit should be increased to 60 days	4/3/2015 9:44 AM
208	You do not have to notify the board of other areas of expertise. Why do we have to have extra steps with this one?	4/3/2015 9:23 AM
209	no comment	4/3/2015 8:49 AM
210	Board should offer a standardized form along with allowing PT to attach certificate of completion from said DN course completion. This should help avoid confusion and misinterpretation of DN protocol per state.	4/3/2015 8:22 AM
211	qualifications need to be in place before they can legally treat the public if you are requiring qualifications to be documented. We can't practice PT unless approved by the State.	4/3/2015 8:15 AM
212	For those who got certified in a course that has met all the criteria listed in paragraph c prior to July 2014, will they have to retake the course or will a copy of the certification received satisfy this criteria? In other words, proof of certification will fall outside of the 30 day limit if certification was received prior.	4/3/2015 5:48 AM
213	Would proof of training in thrust manipulation, tool-assisted soft tissue manipulation, or other skilled intervention also then be required?	4/2/2015 11:32 PM
214	This could be difficult/restrictive if course work was completed many years prior, or for PTs who are already qualified by other criteria in a different state	4/2/2015 11:08 PM
215	Would agree if allows students to complete required amount of practice clients to get certification	4/2/2015 11:00 PM
216	completion matters, not 30 days after a class, this is burdensome regulation	4/2/2015 10:12 PM
217	What about those who have certified several years ago?	4/2/2015 10:09 PM
218	It sounds great.	4/2/2015 9:44 PM
219	Board should follow up with the course providers and receive a verbal report of participants competency	4/2/2015 9:25 PM
220	Clinicians who have already completed 24 hours of courses?	4/2/2015 9:00 PM
221	If course was completed greater than 30 days. There should be a grand father clause	4/2/2015 8:58 PM
222	Do we need to clarify for therapists that have previously met the qualifications, whose coursework would have been greater than 30 days prior to July 1, 2015?	4/2/2015 8:54 PM
223	If the therapist has completed training previously and has been performing this for some time, is proof required and when?	4/2/2015 8:21 PM
224	Maybe 60 days?	4/2/2015 8:01 PM
225	Na	4/2/2015 7:28 PM
226	Will this be a course completion certification?	4/2/2015 7:16 PM
227	I think this is also reasonable. would 60 days or 90 days be too long?	4/2/2015 7:13 PM
228	How will this impact those of us who took the course several years ago? I took the Kinetacore course which does meet these requirements but was 3 yrs ago?	4/2/2015 7:09 PM
229	List certified dry needlers on state website	4/2/2015 7:03 PM
230	Reasonable to require proof to the board of qualifications.	4/2/2015 6:52 PM
231	30 days seems arbitrary and non-specific to whether someone wants to use dry needling in the marketplace. I think if the person intends to use dry needling, only then should they be required to have sent documentation of their training and it's receipt should be documented with the board prior to the use of that skill.	4/2/2015 6:50 PM

232	not sure I understand how this is written. As a licsend PT in AZ for 17years I took two 27hours courses in dry needling in 2014, but have not been able to practice yet (on real patients) because of your previous letter saying all must cease and desist if education was done after Jan 2014....until the ruling is made by July 2015. Will I be able to practice dry needling based the way Section B is written? If NO then I completely disagree with it. I should not have to take the education again because you were so slow to make a decision while letting others who had training prior to 2014 continue to practice while the rules were ironed out.	4/2/2015 6:38 PM
233	Will previous courses before these rules were set count towards this requirement even if it is past 30 days?	4/2/2015 6:24 PM
234	I don't mind informing the state board, but 30 days is quite short and the process should be as simple as possible, preferably a web based procedure.	4/2/2015 6:22 PM
235	Based on the definition anyone that took a course that includes all the criteria but took the course between January 1, 2014 and July 1, 2014 would not be covered under the statute. Otherwise the actual process of submitting to the Board is fine.	4/2/2015 6:09 PM
236	Suggest 60 days	4/2/2015 6:06 PM
237	I dont think that PTs should be required to send in proof of course completion. They need to retain proof of course completion. Maybe even display it, but I dont think that it is necessary to have to send it in.	4/2/2015 5:51 PM
238	Throughout the 2014 year, many physical therapists took the requirements and did not provide documentation of completion. How will this be regulated?	4/2/2015 5:50 PM
239	There is no good reason for the physical therapist to have to provide documentation to the Board prior to providing dry needling. This is insulting to the profession and a waste of time for the PT and the Board. The PT should only have to provide such documentation if a bona Fide complaint, citing substandard care, has been filed with the Board.	4/2/2015 5:43 PM
240	Again, A) unnecessary and onerous for protection of the public or for ensuring competence of physical therapists in performing this procedure. Guidelines ensuring that physical therapists perform in an competent and ethical manner are explicitly required elsewhere in the regulations. Other, potentially dangerous, treatments (ie spinal mobilisation, aquatic therapy, other modalities) require competence of the physical therapist. Dry needling technique would also be equally contemplated by the language in the regulations requiring physical therapist competence.	4/2/2015 5:41 PM
241	The only question is if we have completed a course in the year 2014 and have not submitted proof of compliance in that 30 day window.	4/2/2015 5:41 PM
242	Seems reasonable	4/2/2015 5:38 PM
243	I am not sure the reason behind needing to inform the board regarding any course training before employing its techniques. It's not required for anything else in our scope of practice.	4/2/2015 5:32 PM
244	What about therapist who took course which satisfies requirements greater than 30 days prior to this going into effect? Will they need to take course over?	4/2/2015 5:31 PM
245	Unsure how this will affect those currently trained. Will be need to provide documented proof if we have been grand fathered in currently.	4/2/2015 5:20 PM
246	What is the consequence if not provided?	4/2/2015 5:17 PM

Q7 Please describe your satisfaction with Section C 1 of the draft rules. Section C 1.C. COURSE CONTENT THAT MEETS THE TRAINING AND EDUCATION QUALIFICATIONS FOR “DRY NEEDLING” SHALL CONTAIN ALL OF THE FOLLOWING:1. THE COURSE CONTENT SHALL BE APPROVED BY ONE OR MORE OF THE FOLLOWING ENTITIES PRIOR TO THE COURSE(S) BEING COMPLETED BY THE PHYSICAL THERAPIST.a. COMMISSION ON ACCREDITATION IN PHYSICAL THERAPY EDUCATION, b. AMERICAN PHYSICAL THERAPY ASSOCIATION, c. STATE CHAPTERS OF THE AMERICAN PHYSICAL THERAPY ASSOCIATION, d. SPECIALTY GROUPS OF THE AMERICAN PHYSICAL THERAPY ASSOCIATION, ORe. THE FEDERATION OF STATE BOARDS OF PHYSICAL THERAPY.

Answered: 698 Skipped: 118



Answer Choices	Responses
A. Satisfied	43.98% 307
B. Somewhat Satisfied	5.16% 36
C. Neutral	5.73% 40

D. Somewhat Unsatisfied	2.44%	17
E. Unsatisfied	38.83%	271
Other (please specify)	3.87%	27
Total		698

#	Other (please specify)	Date
1	physical therapists should not be able to perform dry needling	5/2/2015 9:34 PM
2	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:18 PM
3	No, wrong way to fit the patients. This would not give them the professional care needed.	5/2/2015 4:29 PM
4	Very dissatisfied.	5/2/2015 8:26 AM
5	vehemently opposed	5/2/2015 8:20 AM
6	deeply unsatisfied	5/2/2015 7:42 AM
7	They will be undertrained and dangerous... Lawsuits will ensue.	5/2/2015 6:17 AM
8	No Needling Commission	5/1/2015 8:15 PM
9	The physical therapy board are not trained in acupuncture, this is ridiculous !!	5/1/2015 7:50 PM
10	confused	5/1/2015 7:28 PM
11	disgusted	5/1/2015 7:26 PM
12	disappointed	5/1/2015 5:45 PM
13	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:25 PM
14	Needs to complete a L.Ac program.	5/1/2015 3:49 PM
15	PTs need to follow acupuncturist guidelines and hours of training	5/1/2015 3:48 PM
16	See my response to section A	4/30/2015 7:09 PM
17	NCCAOM	4/30/2015 6:12 PM
18	foxes guarding the hen house. The pubics safety is at stack here!	4/30/2015 4:43 PM
19	shall include the acupuncture and medical board of spec. states	4/30/2015 1:55 PM
20	I think the standard of care would be accreditation of an acupuncture accredited institution, not choices "a thru e."	4/28/2015 10:33 PM
21	Horrified	4/24/2015 12:04 AM
22	acupuncture should be learned from a qualified instructor in the field	4/23/2015 5:30 PM
23	The training and education of needling is insufficient	4/23/2015 2:59 PM
24	Please review the credentials required for acupuncturists. Their training is extensive and is nearly doubled in length and coursework to perform a diagnosable condition with specific treatment.	4/22/2015 9:43 PM
25	They are not trained in the study of Acupuncture	4/22/2015 9:15 PM
26	LOL	4/13/2015 7:55 PM
27	see comment for section A	4/5/2015 8:59 PM

Q8 Please provide any comments regarding Section C 1.

Answered: 229 Skipped: 587

#	Responses	Date
1	I don't think these entities are qualified to provide approval for dry needling.	5/3/2015 12:32 AM
2	These are not proper accreditation channels.	5/2/2015 11:44 PM
3	Again, this a way to get them more revenue without the training and sacrifice it takes to be an acupuncturist	5/2/2015 11:02 PM
4	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:18 PM
5	The education requirements is inadequate and Arizona should require a Master's of Acupuncture Studies	5/2/2015 8:06 PM
6	Why is there no acupuncture professional involved?	5/2/2015 7:21 PM
7	Only MD's and Acupuncturists with required thousands of hours training should be the only ones using needles within the skin. You are putting the publics saftey at risk.	5/2/2015 5:26 PM
8	How would physical therapists feel if acupuncturists began using physical therapy in their sessions.	5/2/2015 5:08 PM
9	If there are License for Acupuncturists in the State of Arizona, how can a PT do "Dry Needling" which is putting ACUPUNCTURE NEEDLES into a person's body? Let the PTs go to Acupuncture School.	5/2/2015 3:48 PM
10	Unacceptable training	5/2/2015 3:36 PM
11	These departments are not versed or educated in this type of use of needles on patients.	5/2/2015 3:36 PM
12	See my comments from Section A. This is not proper education. PTs wanting to perform needling should receive an appropriate acupuncture education and be licensed as such, just like every other acupuncturist must. Dry needling is not an appropriate modality for PT to claim. PT should refer a patient out to a licensed acupuncturist for needling (which, to a licensed acupuncturist, involves far more than just needling trigger points and is thus far more safe and effective in an LAc's hands.)	5/2/2015 3:10 PM
13	Physical therapists should recruit members of other professionals who have always used needles in their practice and are highly trained ie. Acupuncturists if they are looking for any kind of standards but not within their own profession who can not sufficiently learn how to use needles especially with only 24 hours.	5/2/2015 3:07 PM
14	Since this is an acupuncture technique, shouldn't one of those bodies be the acupuncture board?	5/2/2015 3:03 PM
15	Again the training is ill-fit for the invasiveness of the procedure.	5/2/2015 2:54 PM
16	There is no reference to Chinese medicine and that the applicant will have any knowledge regarding physiology, and systemic nerve to organ functionality.	5/2/2015 2:53 PM
17	Acupuncture is not and should not be in a PT's scope of practice, unless licensed by the Acupuncture Board.	5/2/2015 2:43 PM
18	The course content is only approved by physical therapist-related groups. It should have be approved with representation by licensed acupuncturists to ensure all dangers and potential liabilities are fully realized and the PT is adequately trained for.	5/2/2015 2:40 PM
19	If they are practicing "dry needling" then they should not be allowed to conduct this practice with acupuncture needles. Only qualified Acupuncturists are legally allowed to use acupuncture needles.	5/2/2015 2:10 PM
20	If they want the patient to have dry needling technique done they need to refer him/her to a trained acupuncturist.... period.	5/2/2015 2:09 PM

21	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:06 PM
22	How can any physical therapy association approve an acupuncture technique if they have not been trained in doing it properly?	5/2/2015 12:24 PM
23	The courses should have more minimum requirements than listed in the bill.	5/2/2015 11:29 AM
24	Physical therapists are not the specialists of acupuncture or 'dry needling'. I do not trust in the education being provided.	5/2/2015 11:19 AM
25	Your course content should not be decided upon by your healthcare association as it is not in your scope of practice. The California State Board of Acupuncture should be determining every aspect about this proposal as they are the only ones with adequate knowledge and licensure to do so.	5/2/2015 10:12 AM
26	Because PTs offering dry needling will in effect be offering acupuncture services, the course content needs to be approved by an entity outside of the Physical Therapy community. At the very least, this should be American Board of Medical Acupuncture or any of the accreditation bodies that oversee acupuncture licensing.	5/2/2015 10:12 AM
27	the regulations should required at a minimum professional master's degree and professional master's level certificate and diploma programs in acupuncture, or a professional master's degree and professional master's level certificate and diploma programs in Oriental medicine,	5/2/2015 10:08 AM
28	The Physical Therapy boards know nothing about Chinese Medicine and should not be the source that oversees proper education.	5/2/2015 10:06 AM
29	The course content should be approved my other healthcare professionals that are familiar with and educated in the practice of using acupuncture needles for "dry needling", including MD's, Chiropractors, Acupuncturists, etc. Because this is an entirely new practice for Physical Therapists, they should not be the only ones determining the course content and hours.	5/2/2015 9:01 AM
30	The governing state acupuncture board should determine who gets to needle	5/2/2015 8:47 AM
31	A profession with no knowledge of inserting needles in the body should not regulate said knowledge. If such a course does exist it should be regulated by professions with such knowledge (acupuncture for example since this particular skill set is taken from that system of medicine)	5/2/2015 8:31 AM
32	See comments for section A. Course content should be approved by qualified a board of Acupuncture	5/2/2015 8:26 AM
33	NCCAOM needs a say in this too.	5/2/2015 7:55 AM
34	Seeing as "dry needling" is a type of acupuncture, the NCCAOM should should be the approval body.	5/2/2015 7:46 AM
35	Insufficient training and out of scope. See first 2 comments	5/2/2015 7:43 AM
36	Shouldn't come acupuncturists sign off on this?	5/2/2015 7:42 AM
37	This is not enough training!	5/2/2015 7:41 AM
38	Only by licensed acupuncturist	5/2/2015 7:17 AM
39	Physical therapists don't fully understand the scope of acupuncture and therefore shouldn't be training others to practice this medicine. Regardless of what label they use to call the practice.	5/2/2015 7:14 AM
40	Training should be more hours.	5/2/2015 2:47 AM
41	No offense, but physical therapists are no expert in using needles in clinical setting by any means.	5/2/2015 12:45 AM
42	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's	5/2/2015 12:45 AM
43	PT should train for a minimum of 2,500 as acupuncturists do.	5/2/2015 12:24 AM

44	All of the listed associations are physical therapy associations which have a biased opinion because they desire the ability to needle. However, dry needling is not proper acupuncture procedure and as stated earlier, can do more harm to the patient than good. Every physician takes an oath to "first do no harm". Course content should at least be approved by oriental medicine board associations.	5/2/2015 12:03 AM
45	I don't feel these entities are qualified to approve course content.	5/1/2015 11:07 PM
46	Physical therapists are not trained to be acupuncturists. Why would you even consider this?	5/1/2015 10:57 PM
47	Practicing dry needling as a PT is actually practicing acupuncture without a license. Proper education for dry needling is a masters degree in acupuncture.	5/1/2015 10:51 PM
48	Giving substandard guidelines and education is a serious safety concern! Of course PT related organizations will approve them because they care ultimately about money and not patient care.	5/1/2015 10:48 PM
49	One or more? Have all of these organizations approved training or only some of them? Is this only partially accepted practice?	5/1/2015 10:29 PM
50	The board really needs to set acceptable standards, and these are not it.	5/1/2015 10:21 PM
51	Sounds like acupuncture and should be done by a LAC.	5/1/2015 10:11 PM
52	And what is the point of having acupuncture as a separate modality? This dilutes an entire tradition of a powerful medicine.	5/1/2015 10:00 PM
53	24 hours is not enough training!	5/1/2015 9:48 PM
54	Coursework should be approved by an acupuncture licensing board, not the physical therapy board.	5/1/2015 9:44 PM
55	PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:30 PM
56	The idea that the governing body is one that is going to benefit by putting consumers in harms way is highly suspicious. If this goes through I will actively support reviewing the physical therapy associations ability to govern itself.	5/1/2015 9:29 PM
57	Even though "dry needling" is a minute aspect of acupuncture, it is still acupuncture. Therefore, it should be regulated by the National Certification Commission for Acupuncture and Oriental Medicine. The reason this organization is not listed as an option is because the required training for "dry needling" does not meet ANY standard for an Acupuncturists. First year acupuncture students have received more supervision and experience than this legislation proposes.	5/1/2015 9:28 PM
58	INSUFFICIENT SCHOOLING	5/1/2015 9:17 PM
59	What is being called Dry Needling is actually the practice of Acupuncture. It should be regulated by the Acupuncture community and the NCCAOM having PT's regulate acupuncture is foolish, inappropriate and dangerous.	5/1/2015 9:11 PM
60	24 hours is totally unacceptable. A minimum of 300 hours as well as continuing education is mildly acceptable.	5/1/2015 8:48 PM
61	The NCCAOM (national certification commission for acupuncture and oriental medicine) is very experienced in certifying individuals for performing acupuncture. Dry needling is another name for acupuncture. The NCCAOM should oversee dry needling.	5/1/2015 8:46 PM
62	Course content should be reviewed and approved by acupuncture experts.	5/1/2015 8:29 PM
63	All needling activities should be regulated by an actual medical agency or by the NCCAOM	5/1/2015 8:27 PM
64	There is no approved clean needle technique in the above mentioned qualifications!	5/1/2015 8:15 PM
65	The fox is in the henhouse.	5/1/2015 8:10 PM
66	If Physical Therapists want to insert acupuncture needles into patients then they should have to attend a three year Masters Degree program to become an Acupuncturist!!	5/1/2015 7:50 PM
67	None of these groups are competent to regulate needling.	5/1/2015 7:39 PM
68	PHysical Therapist should have to take ALL necessary Acupuncture courses required by the state.	5/1/2015 7:37 PM
69	This is entering the domain of an accupuncturist and none of the choices in 1 a-e have the training of an accupuncturist.	5/1/2015 7:33 PM
70	What do any of these groups understand about needling?	5/1/2015 7:28 PM

71	As a licensed Acupuncturist it disgusts me that PT'S are more willing to put their patient's in harms way and provide substandard treatment rather than refer to highly qualified,licensed and nationally certified Acupuncturists. How pathetic. Patients should be guaranteed the right to receive care from the best qualified practitioners and PT'S and this made up thing called "dry needling" isn't it.	5/1/2015 7:26 PM
72	You are not qualified to practice acupuncture. If you want to practice acupuncture, go to acupuncture school.	5/1/2015 7:13 PM
73	This is not enough training. It is a public safety risk.	5/1/2015 7:07 PM
74	Since acupuncture needles are used, training should be conducted by an acupuncturist accredited by the NCCAOM. They have received proper training in handling and insertion of needles.	5/1/2015 6:54 PM
75	24 hours is not nearly a sufficient amount of training. These people will be inserting a medical device into patients. It is irresponsible and reckless to have so little training. the safety of patients is at stake- there have been numerous injuries such as pneumothorax by insufficiently trained PTs. I beg you to reconsider.	5/1/2015 6:45 PM
76	Since when is sticking needles in people a Physical Therapy? Stick to what you are good at!	5/1/2015 6:45 PM
77	The course content should be approved by a proper commission specializing in dry needling such as the www.nccaom.org	5/1/2015 6:35 PM
78	It does not explain the course. Is it 24 hour training or 2,000 hours of training? Dry Needling is acupuncture and should be approved by the National Certification Commission of Acupuncture and Oriental Medicine (NCCAOM) or some type of Acupuncture Board.The fact that an increase in pneumothorax since dry needling has been added into medical scopes of practice should suggest some re-evaluation of the safety of this technique without adequate training.	5/1/2015 6:34 PM
79	Dry Needling should not be within the scope of Physical Therapists. Referral to an acupuncturist is necessary to ensure safety and appropriate treatment.	5/1/2015 6:31 PM
80	Should be by an Acupuncture Society	5/1/2015 6:26 PM
81	Dry needling is an unsafe practice when done with this few hours of training. I fear for the safety of consumers of AZ subject to dry needling.	5/1/2015 6:22 PM
82	Only acupuncturist should be allowed to dry needle and are therefore trained enough to teach others.	5/1/2015 6:19 PM
83	Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason. None of these agencies are overseen by the same entities as licensed acupuncturists, and therefore are not qualified to make pronouncements about what training and education should entail.	5/1/2015 6:15 PM
84	see previous comment	5/1/2015 6:15 PM
85	Any of the PT associations should NOT be involved with creating and evaluating course content. They don't have the knowledge of the field. To think that they teach 1300-2000 hrs worth of material within a 24 hr class is absurd. The Physical Therapy Associations are abusing the system and trying to use other fields of medicine as if it was their own. This needs to be stopped before more patients are hurt at the hands of a unlicensed/untrained practitioner.	5/1/2015 6:10 PM
86	Should be approved by NCCAOM since this is the national board of acupuncture. Physical therapy bodies should not be approving or regulating acupuncture	5/1/2015 6:07 PM
87	Acupuncture should be certified by an accredited Acupuncture college program. The appropriate amount of hours needed should be that of what is required for Lic Acupuncturists Western medical classes should be tested out of since they do have the right amount of training required, as Doctors Naturopaths /chiropractors who enter an accredited program	5/1/2015 5:57 PM
88	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:57 PM
89	Why not inquire with the acupuncture board about qualifications since they are the experts. PT boards and groups are not experts	5/1/2015 5:51 PM

90	To be quite clear, the act of inserting an acupuncture needle into the body, under any pretense, or for any purpose whatsoever, is the practice of acupuncture. "Dry needling" is far outside both physical therapists' scope of practice and their scope of education and training. In most states, to become a licensed acupuncturist, an applicant must complete a minimum of 1,905 hours of education and supervised clinical training (1,245 hours of education and 660 hours of supervised clinical training). Yet you are wanting physical therapists who are not licensed by law to practice acupuncture are inserting acupuncture needles (up to four inches or more in length) into unsuspecting patients with 24 hours of training!!!! "Dry needling" was first described over 2,000 years ago in China's earliest and most comprehensive extant medical treatise, the Yellow Emperor's Inner Classic (Huangdi neijing), where it discusses in detail using tender or painful points, also known as "trigger points" or "motor points," to treat pain and dysfunction, particularly of the neuromusculoskeletal system. Simply described, "dry needling" involves inserting an acupuncture needle into a tender or painful point and then appropriately manipulating (rotating and/or pistoning) it for therapeutic purposes. The Food and Drug Administration (FDA) classified acupuncture needles as Class II medical devices subject to strict regulations under the federal Food, Drug, and Cosmetic Act (FDCA) and FDA's regulations. Individuals purchasing or receiving acupuncture needles who are not licensed by law to practice acupuncture are directly violating both civil and criminal provisions of the FDCA intended to protect public safety. 21 U.S.C. § 331(a)-(c), (g). These include the FDA's requirements that acupuncture needles can only be sold to "qualified practitioners of acupuncture." 61 Fed. Reg. 64616 (December 6, 1996). FDA prescription labeling requirements themselves specifically prohibit the sale of acupuncture needles to anyone who is not a qualified practitioner of acupuncture. The required FDA prescription labeling on the package from which acupuncture needles are to be dispensed states: "Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the States." 21 CFR § 801.109(b)(1) (emphasis added). Any individual who is not licensed by law to practice acupuncture is directly violating the FDCA and FDA's civil and criminal prohibitions when they purchase or receive acupuncture needles for use in "dry needling."	5/1/2015 5:46 PM
91	These boards should recognize such safety issues and concerns and never approve this as proposed	5/1/2015 5:45 PM
92	Dry Needling is an acupuncture technique, the course content should be approved by the state acupuncture board and the NCCAOM.	5/1/2015 5:35 PM
93	Physical therapists do not have adequate understanding or training to perform or regulate techniques using acupuncture needles.	5/1/2015 5:33 PM
94	Acupuncturist in CA receive over 1000 hrs of training for needle insertion. I do not believe this small amount of training is sufficient to prevent harm to patients as evidenced my many recent complaints involving pneumothorax with dry needling.	5/1/2015 5:30 PM
95	These people are unqualified to judge safety standards if they want to send undertrained therapists into the general population with needles.	5/1/2015 5:26 PM
96	A full four year degree should be required of any practitioner.	5/1/2015 5:26 PM
97	It should be required that a non-PT entity also must approve the course content - ideally, a licensed acupuncturist.	5/1/2015 5:20 PM
98	A certified acupuncture board should approve the course	5/1/2015 5:07 PM
99	Not enough.	5/1/2015 5:05 PM
100	Dry needling comes under scope of practice for acupuncture/oriental medicine	5/1/2015 5:03 PM
101	I don't feel these entities are qualified to accredit their training.	5/1/2015 4:56 PM
102	Dry needling is acupuncture. It is called thrusting and therefore, should be approved by the acupuncture board, not the PT boards.	5/1/2015 4:54 PM
103	None of the entities are trained in the science and ancient practice of dry needling and acupuncture, therefore they are not sufficient providers of training in this area at all, EVER.	5/1/2015 4:53 PM
104	Unbelievable that dry needling is something that is understod in a 24 hour course when it all acupuncture schools are 4 years long. I call Bull Shit to PT dry needling and how many lungs will be punctured???	5/1/2015 4:43 PM
105	PTs and their boards are crossing the line with licensed acupuncturist. We go to school for 4 years and pass a 4 part board exam in order to practice. Anything less is dangerous to the public.	5/1/2015 4:42 PM
106	Physical therapists must have a proper acupuncture training & must be recognized by State of Arizona Acupuncture Board of Examiners!!!	5/1/2015 4:36 PM

107	As you are trying to practice an invasive procedure with significant risk of pneumothorax, this falls under the guidance of courses geared more to physicians or acupuncturists that have additional training in risk management for this procedure. I would require any training to meet those standards.	5/1/2015 4:36 PM
108	Physical Therapist training is not the same as that of an Acupuncturist	5/1/2015 4:25 PM
109	Dry needling is acupuncture!! And by no means should a PT offer acupuncture!	5/1/2015 4:21 PM
110	I do not believe PT's should preform dry needling with less than 2000 hrs. of education.	5/1/2015 3:49 PM
111	24 hours is NOT a sufficient amount of training for a PT to perform acupuncture (dry needling). As a Licensed Acupuncturist myself, I was required to obtain over 1,000 hours of training. Therefore I feel there is a serious public safety concern due to their lack of education and training in needling. I feel it would be in the best interest of consumers/patients to require more training for PTs who wish to needle.	5/1/2015 3:33 PM
112	Leave it to the professionals and not a PT	5/1/2015 1:47 PM
113	No no no	5/1/2015 12:44 PM
114	Dry Needling is acupuncture and wondering why you do not have people from that profession overseeing what is going on since they have specific training in the area	5/1/2015 8:35 AM
115	These entities are not experts in the area of Acupuncture	5/1/2015 2:10 AM
116	Physical Therapy boards are not trained acupuncturist or doctors. Not qualified!	5/1/2015 12:04 AM
117	This is inadequate training. Acupuncturists have thousands of hours of training. "Dry needling" is acupuncture, but without the training. An increase of pneumothorax is already being seen with this very unfortunate breach in scope of practice.	4/30/2015 10:14 PM
118	This is dangerous to public health and safety. Consumers deserve to know that PTs only have a mere 24 hours of training with no supervised clinical experience. Approving a 24 hour course is simply criminal and dangerous.	4/30/2015 9:49 PM
119	What about a more experienced, unbiased medical body that has the public interest rather than an in-house association?	4/30/2015 8:21 PM
120	None of these entities have enough training or comprehension of this type of needling technique and therefor are not qualified to approve any course material on the subject.	4/30/2015 7:44 PM
121	See my response to Section A	4/30/2015 7:09 PM
122	Dry needling is acupuncture and Ought to be regulated as other professions that regulate it ad such:L Ac.,MD s as examples.	4/30/2015 6:12 PM
123	Course content should be approved by the NCCAOM and the State Acupuncture Board, as "dry needling" is acupuncture	4/30/2015 2:48 PM
124	Acupuncture, like Western Medicine is a complex subject. It cannot be mastered in a weekend or in a month. All AAMA members in addition to four (4) years of medical school (MD or DO), must have 300 hours of didactic and clinical acupuncture education and training. A non-physician must have in excess of 2,000 hours of clinical and didactic education and training before they can become certified to treat patients in most states.	4/30/2015 2:06 PM
125	Not enough	4/30/2015 2:02 PM
126	this is not physical therapy this is a treatment using acupuncture under the guise of a new name.	4/30/2015 11:44 AM
127	how does that affect acupuncturists who ARE trained in needling?	4/30/2015 9:58 AM
128	If the training is for trigger point therapy this is well within the scope of PT if the training is for biomedical reframing of using Traditional Chinese Medicine acupuncture points it is woefully inadequate and there will be liability issue in the future.	4/30/2015 9:27 AM
129	I feel it would be more appropriate and professional to have just one of these entities in charge of establishing criteria and giving approval, so that it is more consistent.	4/30/2015 7:01 AM
130	Acupuncture is already regulated by the State. Dry needling is simply a covert attempt to keep PT's from being regulated by acupuncture requirements.	4/30/2015 2:06 AM
131	Dry needling is acupuncture	4/30/2015 12:20 AM
132	No educational standards for dry needling have been set by any of these groups	4/29/2015 9:29 AM

133	Currently years of coursework are needed to become an acupuncturist. I would be careful to provide acupuncture service under 40 hours of coursework.	4/28/2015 10:33 PM
134	None of these entities have sufficient training or authorization to oversee acupuncture. These agencies do not rely nor have they fully researched the field and implications of performing acupuncture with only 24 hours of training in light of national and international standards requiring over 1000 hours for safe practice by a non-MD.	4/28/2015 9:59 PM
135	Dry needling is a form of acupuncture and the course content should have input from a licensed acupuncturist. Indications and contraindications could be more fully understood with someone who has a higher level of education in needling.	4/28/2015 4:12 PM
136	What do the above boards know about dry needling, also know as acupuncture therapy, to give out an accreditation?	4/27/2015 6:33 PM
137	If the physical therapist is using needles to penetrate the skin as is defined as "DRY NEEDLING" and "ACUPUNCTURE" then the act should be regulated by the AZ Acupuncture Board of Examiners.	4/26/2015 5:48 PM
138	How can physical therapist boards know what is involved in acupuncture and what is safe?	4/25/2015 12:21 AM
139	Not enough training it is acupuncture and is not safe for their patients.	4/24/2015 8:35 PM
140	All training should be in person, hands on and meet the same requirements as chiropractors and doctors.	4/24/2015 6:37 PM
141	One or a few courses in dry needling is not enough.	4/24/2015 6:04 PM
142	Training is lacking and should be held to acupuncture standard. The needle no matter what you call the technique is an acupuncture needle. They should be regulated by the Acupuncture Board.	4/24/2015 4:50 PM
143	Please add the National Certification Commission for Acupuncture and Oriental Medicine to this list.	4/24/2015 4:14 PM
144	I hear many cases of how dry needling is performed, and it is like very poor acupuncture needling. I am shocked at the cases I have seen. Even if these associations approve their training, they aren't aware of proper needling technique either.	4/24/2015 3:51 PM
145	Course training should be accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM)	4/24/2015 3:25 PM
146	Dry needling is acupuncture. Certification should be done according to the standards of the NCCAOM. This is not even close to enough training to be safe for anyone.	4/24/2015 2:46 PM
147	each body needs to clarify what it's standards are	4/24/2015 1:47 PM
148	If you are using an acupuncture needle to treat in acupuncture points, the courses and standards should be regulated by the acupuncture board.	4/24/2015 12:59 PM
149	Physiotherapists are not trained well enough and they don't deserve to take food away from my children. I have 11 kids	4/24/2015 12:26 PM
150	There is already a well-established national acupuncture board that should be the monitoring agency in order to ensure public safety.	4/24/2015 10:43 AM
151	The course content can not be evaluated by PT's unless there are PT's on the group who can demonstrate that they have completed a more rigorous program.	4/24/2015 7:17 AM
152	No comment	4/24/2015 1:04 AM
153	The education is designed by physical therapists, not acupuncturists...this is disturbing.	4/24/2015 12:37 AM
154	None of these bodies are qualified to make such approvals!	4/24/2015 12:04 AM
155	Physical Therapy Boards should not be allowed to train P.T.s in this technique, unless they become qualified and licensed Acupuncturists with the proper amount of training.	4/23/2015 10:26 PM
156	Is this all made up by physical therapist who don't know what they are doing and making laws to hurt people legally? This C1 is unacceptable	4/23/2015 9:02 PM
157	Training being done by entities that have no knowledge of acupuncture. Another false representation perpetrated on the American public.	4/23/2015 8:35 PM
158	It should be approved by the nccaom	4/23/2015 8:32 PM
159	A heart surgeon does train under a phlebotomist	4/23/2015 5:30 PM

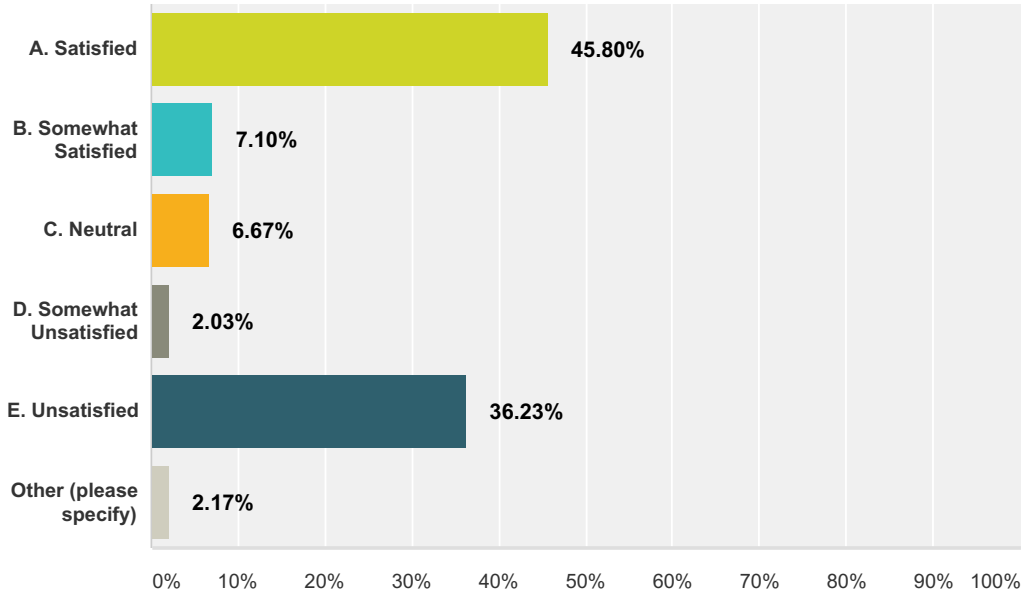
160	Students should be approved by a state or national Board of Acupuncture before needling.	4/23/2015 2:59 PM
161	There is no chinese medical theory.	4/23/2015 12:05 PM
162	Since this is performing acupuncture, the AZ Board of Acupuncturists should be included.	4/23/2015 8:32 AM
163	Needling should only be assessed by licensed professionals who go through rigorous training & exams. Not physical therapists.	4/23/2015 8:30 AM
164	None of these entities know anything about how to safely do acupuncture, which dry needling really is.	4/23/2015 7:48 AM
165	PTs should not perform Dry Needling (unless you allow massage therapist to perform physical therapy?)!!!	4/23/2015 6:42 AM
166	PT are not acupuncturists. "dry needling" is acupuncture.	4/23/2015 5:49 AM
167	These groups are not trained or knowledgeable in acupuncture.	4/22/2015 10:15 PM
168	Dry needling is acupuncture; it is a procedure using acupuncture needles. Why not train at an accredited acupuncture college?	4/22/2015 9:52 PM
169	Insertion of needles (of any kind) should be regulated to those highly trained in BBP's (blood borne pathogens), infection control, testing of information, extensive anatomy, and a solidification in their scope of practices. Physical Therapists are necessary for movement, however are unskilled in performing a diagnostic treatment with needles.	4/22/2015 9:43 PM
170	Out side approval would offer more comprehensive oversight	4/22/2015 9:25 PM
171	See previous comment about dry needling.	4/22/2015 9:20 PM
172	Would you go to a surgeon with a few hours of training to operate on your child that had a problem?	4/22/2015 9:15 PM
173	Dry Needling is Acupuncture as it is being performed by PTs, minus the 2000 hours of training.	4/22/2015 9:14 PM
174	The APTA, State Chapters, and Specialty Groups are not qualified to gauge if a course of study is adequate for a new technique usually given as Continuing Ed. They are institutions that do not regulate the profession and not interested in pushing for the highest standards to serve and protect the public. They are basically self-serving organizations looking to make as much money for their constituents as possible.	4/22/2015 6:58 PM
175	There is no oversight from a trained acupuncturist or medical.	4/22/2015 6:24 PM
176	Only the trained acupuncturist shall perform penetrating the skin with any kind of needles to protect the public health and interest .	4/22/2015 5:17 PM
177	Leave acupuncture to the acupuncturists and PT to the PTs. Also, does the research support adding this modality (really a discipline)?	4/22/2015 4:44 PM
178	I don't believe any of these entities are knowledgeable enough about puncturing the skin with needles to dictate the information necessary to do it safely.	4/21/2015 10:58 AM
179	will the courses also count toward AZ's con-ed units for PT license application? I believe that needs to be stated within the rules.	4/14/2015 9:12 AM
180	Even if you listed an additional ten PT groups, it wouldn't change the fact that you all follow what your Federation programs you all to do and say.... and we all know how that game works. Nope, it's unsatisfactory.... you do not have listed on there the NCCAOM or the AZ Acupuncture State Board.	4/13/2015 7:55 PM
181	Physical therapist organizations have no business approving course content for acupuncture - related skills.	4/11/2015 2:27 PM
182	The blind leading the blind	4/11/2015 10:19 AM
183	Since dry needling is acupuncture, why is there no review of training and training approval from acupuncture board--those who know this best?	4/10/2015 3:53 PM
184	Physical therapists are not qualified to judge training requirements for dry needling!	4/10/2015 2:49 PM
185	Where is the acupuncturist recommendations? Where is public opinion? Where is the board of professions rep?	4/10/2015 2:13 PM
186	It should be approved by acupuncture accreditation organizations. Because that is exactly what you are trying to do. Acupuncture without out proper training.	4/10/2015 1:53 PM
187	I don't think PTs have enough training for this technique	4/10/2015 11:37 AM
188	Add: f. Equivalent ranking entity outside the US may be considered.	4/10/2015 9:45 AM

189	What is the difference in requirements for each group?	4/9/2015 9:57 PM
190	Item c. of #1. State Chapters approval comes from a non-regulated group of individuals that may or may not have any experience or qualifications to determine the appropriateness of a provider of "dry needling" techniques. Course approval, in this instance, can be given without any minimal standards of care or requirements and certainly no accountability to any regulating body.	4/8/2015 12:41 PM
191	No specific comments	4/6/2015 10:07 PM
192	No reference to those therapists who taken the initiative to completed coursework available and are currently practicing dry needling.	4/6/2015 9:18 PM
193	The APTA does not approve courses, so adding them to this list is meaningless.	4/6/2015 7:32 PM
194	Many foreign trained physios have been practicing what their country calls "acupuncture" for years. What do we do with them? Some sort of proficiency exam?	4/6/2015 11:12 AM
195	Ditto A and B	4/5/2015 9:40 AM
196	I mostly agree with this section with the exception of my situation and others in the situation. There are a couple established and well known institutions that have been offering and providing certifications for dry needling therefore I believe these organizations should be taken into consideration when determining practice regulations. Many of the PTs certified prior to Jan 2014 took these exact courses and have learned the same thing as those who took it after and will take it in the future. I feel there should be a clause defining those who became certified prior to July 2015.	4/5/2015 8:36 AM
197	There should be a consensus to establish valid and consistent treatment methods	4/4/2015 8:03 PM
198	all these groups appear capable of approving this information	4/3/2015 11:38 PM
199	documented under previous section	4/3/2015 6:10 PM
200	Who will develop the standards	4/3/2015 5:32 PM
201	Assuming you are including CAPTE as dry needling may become a criterion for entry level practice.	4/3/2015 2:45 PM
202	Grandfather clause in draft	4/3/2015 12:06 PM
203	This does not allow for a foreign trained individual to be approved for DN. I'm taking a course in the UK, but it would not be accepted here, even though it is a 125 hour advanced course. Of course for the majority of PTs this is not an issue, just a select few.	4/3/2015 9:49 AM
204	CAPTE does not approve courses. CAPTE accredits DPT programs based upon a multitude of criteria. Therefore item "a" should read "A CAPTE accredited Doctor of Physical Therapy educational program".	4/3/2015 9:22 AM
205	no comment	4/3/2015 8:49 AM
206	Kinetacore training is the best	4/3/2015 8:21 AM
207	If the standard of practice for state licensure for Acupuncturists is included by these entities, I can be satisfied. I would hope that our professional standards are no less and be detrimental to the professionalism of PT	4/3/2015 8:16 AM
208	May be somewhat limiting.	4/3/2015 7:36 AM
209	Why not just the APTA?	4/3/2015 4:19 AM
210	The "certification institutes" " are self appointed profiteers with no justifiable rationale for holding the keys to "certification"	4/2/2015 10:16 PM
211	How do we know which courses are accredited? How do I know if my certification is on the approved list?	4/2/2015 10:10 PM
212	Having these organizations spelled out like this could make the rules obsolete in the future if names/organization change. Why not something less specific such as other wording of the practice act for approved education.	4/2/2015 10:07 PM
213	training qualifications should not need to be approved by more than one entity for ability to practice	4/2/2015 9:54 PM
214	Perfect.	4/2/2015 9:45 PM
215	Board should provide a list of educators, to AZ PT's, who meet board standards	4/2/2015 9:27 PM
216	I would eliminate C (state chapter)	4/2/2015 9:22 PM

217	I do not believe that the APTA should be a sole approval source of this particular continuing education. I feel it should be approved ONLY in conjunction with federal or state entities.	4/2/2015 9:10 PM
218	1-2 entities at most as more will increase the red tape and time.	4/2/2015 8:33 PM
219	agree it should be accredited by a governing board for PT's	4/2/2015 7:54 PM
220	No comment	4/2/2015 7:28 PM
221	What about courses that were taken before the new rules were established? Will they be counted toward the 24 contact hours and how will those people who had taken classes in the "gap time" between Jan. 2014 and the time at which therapists were told to stop dry needling until the board came up with new regulations notify the board of their training.	4/2/2015 7:21 PM
222	no comment	4/2/2015 7:14 PM
223	Provide acceptable course content.	4/2/2015 7:03 PM
224	courses by other providers may be clearly appropriate for physical therapist under this statute limiting the approval mechanism to physical therapy related approval bodies is not necessary and in some cases shows a bias towards physical therapy and could be a basis for antitrust challenges	4/2/2015 6:50 PM
225	Not sure of the approval process at this point and how that is determined. I'm unaware of approved courses by any of these entities at this time. A quick search on the internet did not make it easy to find out this information.	4/2/2015 6:29 PM
226	Not sure if that includes some of the large groups teaching- MyoPain (Dommerholt), James Dunning, IAOM, Kinetacore(Edo Zylsrta) etc. Please clarify-	4/2/2015 6:13 PM
227	Can a state board approve a course offered by another medical organization (eg. AMA)?	4/2/2015 6:00 PM
228	Mandating instruction from APTA, its subdivisions, State Chapters etc. is unnecessary because it presumes that the above entities are a guarantee for providing adequate education on the procedure when peer to peer training can provide adequate, if not superior, instruction.	4/2/2015 5:46 PM
229	If it goes along the same guidelines of any other course then I am fine with it.	4/2/2015 5:34 PM

Q9 Please describe your satisfaction with Section C 2 of the draft rules. Section C 2.C. COURSE CONTENT THAT MEETS THE TRAINING AND EDUCATION QUALIFICATIONS FOR “DRY NEEDLING” SHALL CONTAIN ALL OF THE FOLLOWING:2. THE COURSE CONTENT SHALL INCLUDE THE FOLLOWING COMPONENTS OF EDUCATION AND TRAINING:a. STERILE NEEDLE PROCEDURES TO INCLUDE ONE OF THE FOLLOWING STANDARDS:i. THE U.S. CENTERS FOR DISEASE CONTROL AND PREVENTION, ORii. THE U.S. OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATIONb. ANATOMICAL REVIEW,c. BLOOD BORNE PATHOGENSd. CONTRAINDICATIONS AND INDICATIONS FOR “DRY NEEDLING”,

Answered: 690 Skipped: 126



Answer Choices	Responses	Count
A. Satisfied	45.80%	316
B. Somewhat Satisfied	7.10%	49
C. Neutral	6.67%	46

D. Somewhat Unsatisfied	2.03%	14
E. Unsatisfied	36.23%	250
Other (please specify)	2.17%	15
Total		690

#	Other (please specify)	Date
1	Yes a Masters program in dry needling could include this	5/2/2015 2:55 PM
2	very dissatisfied	5/2/2015 8:32 AM
3	deeply unsatisfied	5/2/2015 7:43 AM
4	shocked	5/1/2015 5:49 PM
5	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:25 PM
6	Needs to complete a L.Ac program.	5/1/2015 3:49 PM
7	not clear on what these standards include	4/29/2015 3:03 PM
8	Horrified!	4/24/2015 12:05 AM
9	tcm theory	4/23/2015 5:33 PM
10	Dry Needling is Acupuncture	4/23/2015 8:31 AM
11	They should be licensed Acupuncturists	4/22/2015 9:18 PM
12	In order to needle one needs to be trained in acupuncture.	4/22/2015 6:26 PM
13	needle disposal	4/14/2015 6:53 PM
14	Many of these are covered in PT PROGRAM	4/13/2015 9:24 PM
15	May want to add a palpation course	4/2/2015 10:07 PM

Q10 Please provide any comments regarding Section C 2.

Answered: 209 Skipped: 607

#	Responses	Date
1	These are absolute minimum requirements.	5/3/2015 12:33 AM
2	There needs to be proper testing	5/2/2015 11:45 PM
3	This training is not done properly in 24 hrs or a weekend course	5/2/2015 11:03 PM
4	Much more is needed.	5/2/2015 10:35 PM
5	Proper needling technique needs to be a focus	5/2/2015 10:23 PM
6	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:18 PM
7	The requirements are inadequate and should be a Master's of Acupuncture Studies	5/2/2015 8:07 PM
8	Again - should meet standards for acupuncture.	5/2/2015 7:22 PM
9	Only MD's and Acupuncturists with required thousands of hours training should be the only ones using needles within the skin. You are putting the publics safety at risk.	5/2/2015 5:26 PM
10	A PT should already be knowledgeable about 2-a through 2-c. Nowhere does the training include the expertise of dry needling for treatment.	5/2/2015 5:18 PM
11	If there are License for Acupuncturists in the State of Arizona, how can a PT do "Dry Needling" which is putting ACUPUNCTURE NEEDLES into a person's body? Let the PTs go to Acupuncture School.	5/2/2015 3:48 PM
12	Not enough training	5/2/2015 3:37 PM
13	Insufficient education	5/2/2015 3:36 PM
14	This is merely a starting point. A bare-bones minimum. It barely brushes the surface of what a licensed acupuncturist spends thousands of hours training to do before they can be licensed. If I knew how much training a PT doing dry needling had vs a licensed acupuncturist, I would run far from the PT and find the nearest licensed acupuncturist.	5/2/2015 3:12 PM
15	WOW, it sounds like "dry needle" physical therapists will know how to sterilize disposable needles, but that's about it. Why are you ignoring 4,000 years of knowledge? Are American doctors really that ignorant? Don't bother answering, I already know the answer.	5/2/2015 2:56 PM
16	My husband had dry needling done once and he left with more pain than when he came to the appointment	5/2/2015 2:41 PM
17	If dry needling is an actual practice, then why do you have to continue to put it in quotations?	5/2/2015 2:11 PM
18	only a licensed acupuncturist should be able to provide the service of dry needling. Having a untrained person do it is a irresponsible and dangerous	5/2/2015 2:11 PM
19	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:06 PM
20	Dry needling safety and efficacy should involve much more detailed instructions than outlined in this bill. It is more than just learning how to insert needles in a sterile manner. Deep and complete understanding of needling techniques, needling anatomy, and other important factors should be considered, as well as a supervised clinical rotation.	5/2/2015 11:31 AM

21	These are basic safety precautions and does not take into account the damage that can be caused by stimulating points that should not be stimulated in a particular patient. Doesn't cover needle technique, sedation or tonification techniques etc.	5/2/2015 11:21 AM
22	Insufficient for safety and especially, efficacy. If the PTs do not have substantial training in the theory behind what they are doing, the results will be hit or miss and will give all acupuncture, including dry needling, a bad name.....needlessly.	5/2/2015 10:14 AM
23	There is no way you will obtain proper safe training of the use of needles in only 24 hours. It is absolutely vital that you learn needle depths and that is not included anywhere in your training!	5/2/2015 10:12 AM
24	Training should require professional master's degree or professional master's level certificate or diploma in acupuncture, or professional master's degree and professional master's level certificate and diploma programs in Oriental medicine	5/2/2015 10:10 AM
25	Contraindications and Indications for needling are something that needs much more training than could possibly fit within that short period of training.	5/2/2015 9:50 AM
26	Theoretically, the above components appear reasonable. But I do not believe that 24 hours is enough to fully and satisfactorily cover all of those components beyond a cursory run through.	5/2/2015 9:05 AM
27	This makes no sense this was a whole semester just these few points	5/2/2015 8:48 AM
28	Does not meet any standard for diagnosis and proper needling for the use of acupuncture needle,. safe location of needles, safe needle techniques, proper depth of needles. Recovery techniques due to improper needle usage.	5/2/2015 8:32 AM
29	Where's the internship?	5/2/2015 7:56 AM
30	Seeing as "dry needling" is a type of acupuncture, the NCCAOM components should be implemented.	5/2/2015 7:47 AM
31	This again is not enough training for the safety of the public. Many a pneumothorax has come from improperly trained PTs	5/2/2015 7:44 AM
32	The needles should not only be clean, they should be placed by professional acupuncturists!	5/2/2015 7:43 AM
33	This is not enough training!	5/2/2015 7:42 AM
34	How can this be taught in a day class.. Only licensed acupuncturist	5/2/2015 7:18 AM
35	Dry needling is acupuncture	5/2/2015 7:15 AM
36	I don't think this is adequate training.	5/2/2015 7:11 AM
37	Inadequate training...	5/2/2015 6:18 AM
38	It should have more hours of supervised clinic.	5/2/2015 2:48 AM
39	Do not specify amount of time or depth of training	5/2/2015 1:00 AM
40	All should be met.	5/2/2015 12:47 AM
41	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's	5/2/2015 12:45 AM
42	24 is unacceptable.	5/2/2015 12:24 AM
43	The listed course content does not include information about points used, indications for using those points, contraindications for using those points, etc. Nor does it include information about side effects of needling and how to address patient concerns about needling.	5/2/2015 12:09 AM
44	There is more to acupuncture than this. Call it what you want it is acupuncture.	5/2/2015 12:08 AM
45	The proper training and knowledge needed surpasses the requirements proposed. I would not feel safe or comfortable receiving a dry needling treatment.	5/1/2015 11:10 PM
46	But it does not specify the dangers of needling too deep in the wrong places	5/1/2015 10:58 PM
47	While the listed topics are important, they are nowhere near comprehensive. A PT should not practice acupuncture unless he or she is also a LAc.	5/1/2015 10:52 PM

48	PT's should not be performing acupuncture with out a license to practice acupuncture. "Dry Needling" is a technique in acupuncture. Calling it another name doesn't negate the fact that it is acupuncture.	5/1/2015 10:48 PM
49	The focus of 3 of the 4 standards are cleanliness, and only one on anatomical review. PT get hours of training in other modalities, it seems an anomaly to have so little training in this new technique.	5/1/2015 10:35 PM
50	What about needling techniques?	5/1/2015 10:23 PM
51	ALL of these s croons need to be tabled completely.	5/1/2015 10:22 PM
52	Just because a physical therapist can learn how to put needles without danger does not mean they can use needles for the highest good of the patient.	5/1/2015 10:02 PM
53	These are important factors to require, but again, inadequate hours and substance in the training I feel to be safe in practice.	5/1/2015 9:56 PM
54	Again, this is a terrible error to let PT's needle!	5/1/2015 9:49 PM
55	Course content seems reas9nable, but should include several hundred hours of supervised clinical experience.	5/1/2015 9:46 PM
56	Physical therapists are not icensed to be piercing the skin. Keep it that way	5/1/2015 9:36 PM
57	The standards for sterile needle procedures come directly from Clean Needle Technique, provided by the Council of Colleges of Acupuncture and Oriental Medicine. Course content that only concerns itself with sterile needle procedures is not sufficient for the practice of acupuncture.	5/1/2015 9:32 PM
58	Again a paltry excuse of proper professionalism. This again is dangerous to the consumer.	5/1/2015 9:30 PM
59	PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:30 PM
60	INSUFFICIENT	5/1/2015 9:17 PM
61	CNT (clean needle technique) which your state requires of licensed acupuncturists is an extra Saturday course, not the majority of our needling technique education, which requires practice. Ideally, that practice would be in the form of a SUPERVISED INTERNSHIP, not a one day observation	5/1/2015 9:17 PM
62	These are conditions for needle insertion only and not qualifications for a Licensed Acupuncturist. What is being called Dry Needling is actually the practice of acupuncture and should only be practiced by those fully trained in that medicinal profession. Anything less is negligent and dangerous.	5/1/2015 9:13 PM
63	Training in acupuncture should also be included in the requirements.	5/1/2015 8:47 PM
64	Should also include safety and clinical hours to ensure basic safety. The increased number of pneumothoraxes by PT's should only serve to prove how dangerous practitioners with no training (20 hours) inserting dangerous devices into the body (needles) can cause irreperable harm	5/1/2015 8:29 PM
65	There is not enough time to go over any of the following effectively. You will be licensing a PT to treat when they are under trained and under qualified.	5/1/2015 7:57 PM
66	This is just a small section of the curriculum for a full 3-4 year acupuncture training program.	5/1/2015 7:39 PM
67	N/A	5/1/2015 7:37 PM
68	Not enough training on the complex interplay of nerves, muscles and trigger points in any of the items listed	5/1/2015 7:34 PM
69	Please review the number of organ punctures patients have had to endure at the hands of inadequately trained PT'S AND DC'S vs LAC'S	5/1/2015 7:27 PM
70	You have not received adequate training to needle patients.	5/1/2015 7:14 PM
71	This is not enough training. It is a public safety risk.	5/1/2015 7:07 PM
72	Again, they're playing with a very complex medical system they do not fully understand. There's far more to it than can be covered in such a short period of time. Acupuncturists study for *years* to do this safely and effectively.	5/1/2015 7:00 PM
73	Where is the supervised clinical patient contacts?	5/1/2015 6:49 PM
74	Education and training should content 1200-2000 clinical hours in Acupuncture school if Pt wants to perform an acupuncture!	5/1/2015 6:48 PM
75	In adequate training poses a public health risk.	5/1/2015 6:47 PM

76	24 hours is not nearly a sufficient amount of training. These people will be inserting a medical device into patients. It is irresponsible and reckless to have so little training. the safety of patients is at stake- there have been numerous injuries such as pneumothorax by insufficiently trained PTs. I beg you to reconsider.	5/1/2015 6:46 PM
77	Who will educate about the effects of stimulating one area with dry needling resulting in a worst condition elsewhere?	5/1/2015 6:42 PM
78	Because dry needling is acupuncture there should be some review of acupuncture by Licensed Acupuncturists	5/1/2015 6:37 PM
79	Dry Needling is a form of acupuncture, and licensed acupuncturists are required to pass years of training and board exams. This training curriculum is insufficient.	5/1/2015 6:34 PM
80	Should require all of above	5/1/2015 6:27 PM
81	This needs to be the National Clean Needle course.	5/1/2015 6:23 PM
82	This no where near enough time to cover these subjects.	5/1/2015 6:22 PM
83	Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason. None of these entities are specifically qualified to advise on using these techniques, which is why there are regulatory agencies that give certifications solely to licensed acupuncturists.	5/1/2015 6:17 PM
84	This part of the class alone should be at least 20-30 hrs. They are considering this a piece of their 24 hrs of training. Absolutely not safe!	5/1/2015 6:14 PM
85	Sterile needling and anatomy training are not enough to properly perform acupuncture. Performing acupuncture without proper Chinese Medicine training reflects poorly on those who have dedicated their careers to practicing Chinese Medicine.	5/1/2015 6:08 PM
86	Safety is not clearly articulated.	5/1/2015 6:04 PM
87	I stand by my previous comments	5/1/2015 5:57 PM
88	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:57 PM
89	Simply not enough time to thoroughly cover such topics and include supervised needling experience	5/1/2015 5:49 PM
90	To be quite clear, the act of inserting an acupuncture needle into the body, under any pretense, or for any purpose whatsoever, is the practice of acupuncture. "Dry needling" is far outside both physical therapists' scope of practice and their scope of education and training. In most states, to become a licensed acupuncturist, an applicant must complete a minimum of 1,905 hours of education and supervised clinical training (1,245 hours of education and 660 hours of supervised clinical training). Yet you are wanting physical therapists who are not licensed by law to practice acupuncture are inserting acupuncture needles (up to four inches or more in length) into unsuspecting patients with 24 hours of training!!!! "Dry needling" was first described over 2,000 years ago in China's earliest and most comprehensive extant medical treatise, the Yellow Emperor's Inner Classic (Huangdi neijing), where it discusses in detail using tender or painful points, also known as "trigger points" or "motor points," to treat pain and dysfunction, particularly of the neuromusculoskeletal system. Simply described, "dry needling" involves inserting an acupuncture needle into a tender or painful point and then appropriately manipulating (rotating and/or pistoning) it for therapeutic purposes. The Food and Drug Administration (FDA) classified acupuncture needles as Class II medical devices subject to strict regulations under the federal Food, Drug, and Cosmetic Act (FDCA) and FDA's regulations. Individuals purchasing or receiving acupuncture needles who are not licensed by law to practice acupuncture are directly violating both civil and criminal provisions of the FDCA intended to protect public safety. 21 U.S.C. § 331(a)-(c), (g). These include the FDA's requirements that acupuncture needles can only be sold to "qualified practitioners of acupuncture." 61 Fed. Reg. 64616 (December 6, 1996). FDA prescription labeling requirements themselves specifically prohibit the sale of acupuncture needles to anyone who is not a qualified practitioner of acupuncture. The required FDA prescription labeling on the package from which acupuncture needles are to be dispensed states: "Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the States." 21 CFR § 801.109(b)(1) (emphasis added). Any individual who is not licensed by law to practice acupuncture is directly violating the FDCA and FDA's civil and criminal prohibitions when they purchase or receive acupuncture needles for use in "dry needling."	5/1/2015 5:46 PM
91	Not sufficient training	5/1/2015 5:40 PM
92	The course content should also include dry needling's place within East Asian medicine, along with Eastern and Western theories of mechanism.	5/1/2015 5:37 PM

93	None of this should be within the scope of a PT. They should refer to an acupuncturist with 1000 hrs or more of training in effective and safe needling techniques.	5/1/2015 5:31 PM
94	This sounds like our Clean Needle Technique prep course we took as acupuncturist students. It had nothing to do with therapy and only with safety. How can these students be getting enough of each??	5/1/2015 5:30 PM
95	A full four year degree should be required of any practitioner.	5/1/2015 5:26 PM
96	Chinese medical theory is integral in correct and proper insertion of acupuncture needles.	5/1/2015 5:16 PM
97	Should include a clean needle test and understanding of the depths of the needling for any point on the body	5/1/2015 5:03 PM
98	Far more training needed	5/1/2015 5:03 PM
99	the training does not properly include training in acupuncture and the side effects of dry needling.	5/1/2015 4:54 PM
100	Totally incapable of teaching in a short amount of time to learn contraindications and indications in 24 hours of education. Insane ego's of PT profession	5/1/2015 4:44 PM
101	There is much more involved than sterile needles and blood born pathogens. Again, crossing the line into another profession!	5/1/2015 4:44 PM
102	the training must be long enough!	5/1/2015 4:40 PM
103	The proposed course is not nearly long enough to sagely train a PT. As most states have ruled that dry needling is simply an acupuncture technique, the training should include all safety, technique, and relevant training that an acupuncturist would similarly go through (including board licensing for proof of competency in these areas). I do not mean that it would require any traditional Chinese medicine history, philosophy, or background, but otherwise this is laughably naive and in many states illegal.	5/1/2015 4:38 PM
104	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:25 PM
105	Dry needling is acupuncture!! And by no means should a PT offer acupuncture! :PT's cannot possibly understand what is contraindicated or indicated for acupuncture since they don't have anywhere close to the 3000 hours I have in my MASTERS IN ACUPUNCTURE!!!	5/1/2015 4:22 PM
106	PT's doing dry needling should receive the same education as Licensed Acupuncturists.	5/1/2015 3:50 PM
107	24 hours is NOT a sufficient amount of training for a PT to perform acupuncture (dry needling). As a Licensed Acupuncturist myself, I was required to obtain over 1,000 hours of training. Therefore I feel there is a serious public safety concern due to their lack of education and training in needling. I feel it would be in the best interest of consumers/patients to require more training for PTs who wish to needle.	5/1/2015 3:33 PM
108	How can you allow them to use acupuncture needles anywhere on the body? They have no training on point location selection.	5/1/2015 1:12 PM
109	Don't allow	5/1/2015 12:45 PM
110	No TCM theory? No channels and points? Contraindications for "dry needling"?? Does that take into account the numerous VERY important safety precautions? For example: that needling at GB21, SP6, UB67, LI4, UB 27-34, R2-16 can cause a miscarriage or preterm labor on a pregnant patient? Do they learn needle angle and depth if insertion for all points? As acupuncturists, we had to learn this for each and every point on the body which is why acupuncture programs are usually around 3000 hours in length. 4 years..longer than a DPT program actually.	5/1/2015 11:13 AM
111	They are going to need training as to the proper places to insert the needles otherwise they can cause nerve damage. I was in a lot of pain after a student acupuncturist put a needle in the wrong location. So it is not just about knowing what to do with the needle after using it...it is about where to put the needle in a persons body.	5/1/2015 8:37 AM
112	Include all the standards, not just one	5/1/2015 6:27 AM
113	Acupuncturists are the experts here...ask them	5/1/2015 2:11 AM
114	It is absolutely insane to think that "dry needling" could be anything other than doing acupuncture without proper training and licensure. Please stop this!	4/30/2015 10:15 PM
115	a. states "STERILE NEEDLE PROCEDURES TO INCLUDE ONE OF THE FOLLOWING STANDARDS" but all of these are important if anyone is inserting needles into the skin. This is dangerously inadequate.	4/30/2015 9:51 PM
116	In the realm of TCM education, academics require hundreds of hours regarding contraindications for both needling techniques and the many different types of disorders where needling techniques need to be modified in over to make sure the treatment is appropriate or not. How can PT's buy this propaganda?	4/30/2015 8:30 PM

117	Vague and in 24 hours of training these cannot be fully covered for the public safety, with sufficient practice and evaluation of the skill of the trainee.	4/30/2015 8:23 PM
118	24 hours of training is not enough time to cover all of this adequately.	4/30/2015 7:46 PM
119	See my response to section A	4/30/2015 7:09 PM
120	Need all of them	4/30/2015 6:15 PM
121	How many hours are spent on the angle,depth or effects of the points used.	4/30/2015 4:45 PM
122	CNT (Clean Needle Technique) certification should be met as well as licensure in acupuncture	4/30/2015 2:49 PM
123	Dry needling is an invasive procedure. Needle length can range up to 4 inches in order to reach the affected muscles. The patient can develop painful bruises after the procedure and adverse sequelae may include hematoma, pneumothorax, nerve injury, vascular injury and infection. Post procedure analgesic medications may be necessary (usually over the counter medications are sufficient). There has been controversy in the United States as to who is qualified to practice dry needling. Since it is an invasive procedure using needles, many take the position that it should only be performed by licensed acupuncturists or licensed medical physicians (M.D. or D.O.). In Illinois, this sentiment was echoed by a decision to reverse legislation permitting physical therapists to perform dry needling. These and other practitioners were performing this procedure who are not trained nor do they otherwise routinely use needles in their practices.	4/30/2015 2:07 PM
124	If you are going to be doing acupuncture/dry needling you need to also teach about the depths of needling so you don't continue to give people pneumothorax or cause them great pain and more injury. There is more to this then following OSHA standards!	4/30/2015 1:50 PM
125	I'm satisfied, however, sterile needle procedures, anatomical review,and blood borne pathogens are already a part of standard PT training.	4/30/2015 11:48 AM
126	anyone using acupuncture needles penetrating the skin needs to have maximum training and education as required by AZ law. see ARS 32-3924	4/30/2015 11:44 AM
127	do they get educated in the eastern knowledge of acupuncture points, meridians?	4/30/2015 10:00 AM
128	see previous comment	4/30/2015 9:27 AM
129	Also listed should be proper technique of needling. I know of a number of people who went for dry needling and were very bruised and sore afterwards.	4/30/2015 7:03 AM
130	I don't see training in actual needling.	4/30/2015 2:08 AM
131	This education is a hazard to public safety. I would never let a PT needle me	4/30/2015 12:22 AM
132	I think this is a good start, but I would be curious to know what is required in an acupuncture institution.	4/28/2015 10:34 PM
133	There is substantially more training needed to properly needle: review of the biomedical and energetic effects of needling in various locations and the related effects of needling as impacted in other parts of the body; supervised clinical training (most critical); and proper needle technique including depth and insertion.	4/28/2015 10:03 PM
134	It is not clear how in depth the training on contraindications would be.	4/28/2015 4:14 PM
135	Seems that a large part of the training is related to sterile needle procedures. While that is, of course, important, there is much more to dry needling/acupuncture than that.	4/27/2015 6:34 PM
136	The safety issues are fine, but contraindications cannot be taught in 24 hours. In acupuncturists' training, clean needle techniques alone are more than 24 hours.	4/25/2015 12:23 AM
137	DRY NEEDLING is acupuncture and should only be administered by a qualified licensed educated Acupuncturist.	4/24/2015 8:37 PM
138	And should include hands on supervised instruction.	4/24/2015 6:39 PM
139	This is basic training needed to insert a needle into a body. It is in NO WAY enough training to provide therapy for the body. A CHILD can learn how to put a needle into the body but this would not make them qualified to practice this form of medicine.	4/24/2015 5:53 PM
140	Should be required to complete Clean Needle safety course as a minimum to protect the public.	4/24/2015 4:51 PM
141	Extremely inadequate. What about theory, modalities, etc. that requires thousands of hours of training. Lack of adequate training equals inferior results and in turn puts acupuncture in a bad light.	4/24/2015 4:20 PM

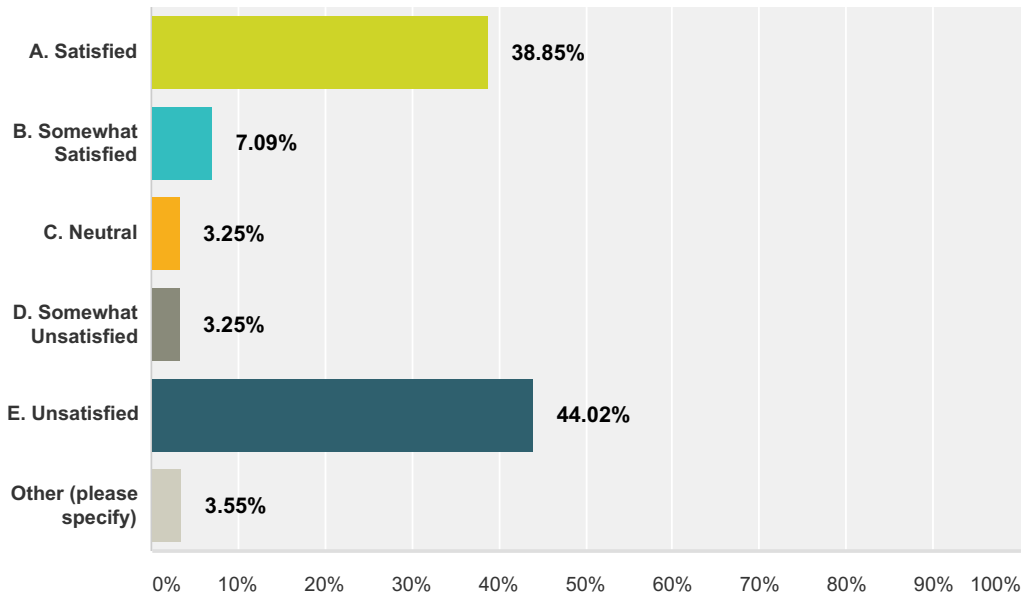
142	A well established Clean Needle Technique course has already been created by the Council of Colleges of Acupuncture and Oriental Medicine (CCAOM)	4/24/2015 3:26 PM
143	This is insufficient training for anyone who will practice needling.	4/24/2015 2:47 PM
144	24 hrs is not enough time to learn all these things & practice the skill of inserting a needle in a body.	4/24/2015 2:30 PM
145	all need to be included in the procedures, not just one. and this isn't enough education	4/24/2015 1:48 PM
146	Physiotherapists are not trained well enough and they don't deserve to take food away from my children. I have 11 kids	4/24/2015 12:26 PM
147	see prior comments	4/24/2015 10:43 AM
148	This is not an over the weekend kind of course just to get PTs covered is it????	4/24/2015 1:05 AM
149	I do not see any parameters regarding placing physical therapist's training in the context of Chinese Medicine. Again disturbing; other professions would not be allowed to be taken out of context in order to make a profit. Patients will be at risk.	4/24/2015 12:42 AM
150	Dry needling is playing with fire. You have not a clue to how untrained amateurs are altering systemic balances and promoting disease!	4/24/2015 12:05 AM
151	There is not enough time spent in classroom or in hand's on clinical training. Acupuncturists perform this technique with over 900 hours of training. This is a public safety issue and should not be allowed without an Acupuncture license.	4/23/2015 10:29 PM
152	This is inadequate training for this type of needling. It needs to be more structured. Like how we learn when going to school to learn acupuncture and the requirements to achieve a masters degree in Acupuncture (dry needling).	4/23/2015 9:04 PM
153	Not at all adequate. This is a sham.	4/23/2015 8:36 PM
154	I realize there is no respect for TCM but there are contraindications for points depending on the person	4/23/2015 5:33 PM
155	Course content should include a study of Acupuncture theory and technique and licensing requirements.	4/23/2015 3:00 PM
156	There is no Chinese medical theory	4/23/2015 12:05 PM
157	I do not see how the training addresses contraindications	4/23/2015 9:12 AM
158	Dry needling is acupuncture. When a PT wants to insert a filiform needle, please have them be trained & licensed as those who insert filiform needles.	4/23/2015 8:31 AM
159	Why do they not have to pass the clean needle technique exam like everyone else who does acupuncture.	4/23/2015 7:50 AM
160	PTs should not perform Dry Needling (unless you allow massage therapist to perform physical therapy?)!!!	4/23/2015 6:43 AM
161	This is not enough training.	4/23/2015 5:50 AM
162	Why is there only one standard? They should have to know OSHA, CDC guidelines, Anatomical review, Blood borne pathogens, and contraindications. One is not sufficient.	4/22/2015 10:16 PM
163	Insufficient hours devoted to point location and needling techniques. No mention of clinical hours devoted to needling.	4/22/2015 9:54 PM
164	Please refer to the previous remarks.	4/22/2015 9:44 PM
165	The risks associated with dry needling extend well beyond this list, and 24 hours is simply not enough time to acquire competency	4/22/2015 9:27 PM
166	They will just know enough to be dangerous. Poor training at best.	4/22/2015 9:18 PM
167	Wet needling is done with hollow syringes to inject fluids. If Dry needling is being done, then it would be done with the same hollow needles without injection of fluids.	4/22/2015 9:15 PM
168	Someone doing Dry Needling must be evaluated by organizations that can do both I (Sterile Needle Technique) and II (Indications and Contraindications for Dry Needling, plus the other two). If neither organization can do both then PTs need to be certified by both of these organizations. A written test made up by an outside organization that covers this information plus an in-class hands-on test would accomplish this.	4/22/2015 6:58 PM
169	I've known acupuncturists that require years and not days of training. It seems that if anyone wants to dry needle should get a masters degree as others do and not try to short cut and add more danger to patients seeking help	4/22/2015 6:26 PM

170	Acupuncturist are trained thru completion of hundreds of hour practical and theoretical to perform what PT claim to be able only in short amount of time. If public interest is on the mind , PT should be named from doing any kind of dry needling.	4/22/2015 5:21 PM
171	This requires no supervised clinical hours	4/22/2015 4:50 PM
172	The education requirements are not nearly enough. Why do the dry needling? What is the expected outcome? What is the physiology behind it? etc...	4/22/2015 4:49 PM
173	This is CLEAN needle technique-- NOT sterile needle technique.... no where in DN is sterile technique used...the use of sterile gloves is not required. Clean technique should be defined as use of non-sterile gloves and agents such as alcohol or soap prior to insertion of the needle.	4/19/2015 9:52 PM
174	Not until the acupuncture profession started pointing out that the PT profession DN/acupuncture had no regard for the above (C2) did the PT's cleverly decide/plan to add that to their so called qualifications all taken from the Acupuncture handbook.... obviously so.	4/13/2015 8:00 PM
175	Dry needling (aka acupuncture) is not a sterile procedure. Also, an understanding of needling precautions and contraindications cannot be conferred in a weekend course. It requires several hundred (if not more)hours of teaching and supervised practice. This is why there have been so many pneumothorax cases when PTs use dry needling.	4/11/2015 2:31 PM
176	The clean needle class I took at school was 6hours. So that leaves only 18 hours to safely learn to needle	4/11/2015 10:21 AM
177	How about theories and practical considerations for when to select which points?	4/10/2015 2:15 PM
178	I do not approve	4/10/2015 11:38 AM
179	What exactly does each training involve? Too much non-info.	4/9/2015 10:01 PM
180	This area needs to include nerve, motor end plate...anatomical review seems vague	4/8/2015 4:51 PM
181	Because of the close proximity and, in some instances, the exact location of acupuncture points and "Dry Needling" points, there must be contraindications and precautions for closely associated acupuncture points.(item 2.a.ii.d.)	4/8/2015 12:42 PM
182	No specific comments	4/6/2015 10:07 PM
183	Dry needling may not require the same strict standards set forth by the above mentioned entities. Those standards set forth for traditional Acupuncture should be considered as a guide for dry needling.	4/6/2015 9:27 PM
184	Probably this is implied but i would expect required content to include the actual clinical skill competency	4/6/2015 9:34 AM
185	same	4/5/2015 9:40 AM
186	I feel these are all appropriate and general topics to be covered during dry needling courses.	4/5/2015 8:39 AM
187	There is risk of injury and infection.	4/4/2015 8:03 PM
188	more than one standard should be followed. I am not familiar of the "anatomical Review" being a standard	4/3/2015 11:40 PM
189	to low of expectations for knowledge of meridian system	4/3/2015 9:00 PM
190	I feel the multiple sticking of the skin with the same needle is asking for infection and law suits	4/3/2015 8:33 PM
191	Anatomical review - as a PT should already be well trained - might be redundant.	4/3/2015 1:23 PM
192	Grandfather clause in draft	4/3/2015 12:08 PM
193	Splitting letter a into subsection i and ii seems a bit clunky/wordy, perhaps there's a more concise way to phrase it	4/3/2015 10:19 AM
194	no comment	4/3/2015 8:49 AM
195	Kinetacore training is best	4/3/2015 8:22 AM
196	I don't believe I am qualified to make a comment on this topic.	4/3/2015 7:36 AM
197	Indications to include differentiation from acupuncture. Clear language to delineate the pathoanatomy and physiological expectations in comparison to acupuncture in order to educate the professional and his patient population.	4/2/2015 10:58 PM
198	I am assuming the board was able to review other states and their qualification requirements for the intervention.	4/2/2015 10:51 PM

199	e. Effects and/or Side effects of Dry Needling	4/2/2015 9:57 PM
200	I believe this makes the procedure safe	4/2/2015 9:46 PM
201	Great.	4/2/2015 9:45 PM
202	I think there should be a restriction of practice of at least two years as a licensed PT before being able to take course work for Dry Needling. This skill requires significant time to get good at superficial and deep tissue palpation to learn how to recognize tissue that is appropriate for dry needling	4/2/2015 8:15 PM
203	No comment	4/2/2015 7:29 PM
204	Would be great if the board provided a list of "approved" courses that contain this criteria.	4/2/2015 7:17 PM
205	reasonable expectation, cooperates with infection control standards.	4/2/2015 7:14 PM
206	I don't know what the standard practice is regarding this and how most courses address this currently	4/2/2015 6:51 PM
207	excellent set of qualifications	4/2/2015 6:50 PM
208	Looks good	4/2/2015 6:42 PM
209	This is another unnecessary requirement of the rules. Physical therapists are already instructed and also have a duty to maintain competence in anatomy, sterile procedure, and aseptic technique and have an obligation to perform physical therapy in a competent manner.	4/2/2015 5:52 PM

Q11 Please describe your satisfaction with Section C 3 & 4 of the draft rules. Section C 3 & 4.C. COURSE CONTENT THAT MEETS THE TRAINING AND EDUCATION QUALIFICATIONS FOR “DRY NEEDLING” SHALL CONTAIN ALL OF THE FOLLOWING:3. THE COURSE CONTENT REQUIRED IN PARAGRAPH (C) OF THIS SECTION SHALL INCLUDE, BUT IS NOT LIMITED TO, PASSING OF BOTH A WRITTEN EXAMINATION AND PRACTICAL EXAMINATION BEFORE COMPLETION OF THE COURSE CONTENT. PRACTICE APPLICATION COURSE CONTENT AND EXAMINATIONS SHALL BE DONE IN PERSON TO MEET THE QUALIFICATIONS OF PARAGRAPH C. 4. THE COURSE CONTENT REQUIRED IN PARAGRAPH (C) OF THIS SECTION SHALL TOTAL A MINIMUM OF 24 CONTACT HOURS OF EDUCATION.

Answered: 677 Skipped: 139



Answer Choices	Responses
A. Satisfied	38.85% 263
B. Somewhat Satisfied	7.09% 48

C. Neutral	3.25%	22
D. Somewhat Unsatisfied	3.25%	22
E. Unsatisfied	44.02%	298
Other (please specify)	3.55%	24
Total		677

#	Other (please specify)	Date
1	very dissatisfied	5/2/2015 8:34 AM
2	deeply disturbed	5/2/2015 7:43 AM
3	Horrified	5/1/2015 9:31 PM
4	horrified	5/1/2015 7:31 PM
5	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:26 PM
6	PTs need to following acupuncturist guidelines & hours of training	5/1/2015 3:49 PM
7	See my response to section A	4/30/2015 7:10 PM
8	Outraged	4/30/2015 6:06 PM
9	no doubt tested by another inadequately trained PT	4/30/2015 4:47 PM
10	Totally against this	4/25/2015 12:26 AM
11	Who writes the exam?	4/24/2015 6:42 PM
12	Horrified!	4/24/2015 12:06 AM
13	24 hours?	4/23/2015 5:37 PM
14	24 hours is not sufficient time to train or educate one in needling a person	4/23/2015 3:02 PM
15	24 hours is enough to cause damage, not enough to be safe	4/23/2015 8:33 AM
16	This is an insult to those thst study 3400 hours and actually take Acupuncture boards.	4/22/2015 9:20 PM
17	no comment, I don't know how many hours this would take	4/14/2015 6:53 PM
18	Seams too high. Physical therapists have a doctoral degree!!	4/13/2015 9:25 PM
19	beyond unsatisfactory.	4/13/2015 8:03 PM
20	Please see my previous comments	4/5/2015 10:26 AM
21	satisfied except for typo	4/3/2015 10:20 AM
22	written examinations have never demonstrated any capacity for improvement of clinical competence. Practical exam & defense is appropriate	4/2/2015 10:21 PM
23	See below comment	4/2/2015 6:44 PM
24	Again, keep to the previous statements and include those who came after the deadline.	4/2/2015 5:39 PM

Q12 Please provide any comments regarding Section C 3 & 4.

Answered: 294 Skipped: 522

#	Responses	Date
1	24 contact hours of education is absurdly low to be considered in any way qualified to perform dry needling! Absolutely unacceptable!	5/3/2015 12:35 AM
2	24 hrs to learn acupuncture is ridiculous and out of the scope of practice	5/2/2015 11:46 PM
3	Again, inadequate to do this!!!!	5/2/2015 11:03 PM
4	Not enough hours to properly understand techniques.	5/2/2015 10:23 PM
5	Not enough training! Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:19 PM
6	The education requirements are inadequate and should be at least a Master's of Acupuncture Studies	5/2/2015 8:08 PM
7	24 hours is ridiculous and dangerous. The clean needle technique class required for being able to test for acupuncture licensure is 8 hours by itself! Needling techniques, safety concerns, supervised observation of technique needs to be many more hours than the 16 hours that would be left.	5/2/2015 8:02 PM
8	Only MD's and Acupuncturists with required thousands of hours training should be the only ones using needles within the skin. You are putting the publics safety at risk.	5/2/2015 5:26 PM
9	Totally inadequate training. An MD must have 300 hours. Nowhere in the criteria is the PT's role and purpose of dry needling clarified.	5/2/2015 5:20 PM
10	24 hours is a joke!!!	5/2/2015 5:08 PM
11	If there are License for Acupuncturists in the State of Arizona, how can a PT do "Dry Needling" which is putting ACUPUNCTURE NEEDLES into a person's body? Let the PTs go to Acupuncture School.	5/2/2015 3:49 PM
12	As noted before, 24hrs is grossly inadequate for the training and education for the medicine and use of dry needling.	5/2/2015 3:38 PM
13	Absolutely unacceptable to allow PTs to do dry needling with only 24 hours, it will cause injury to the general public	5/2/2015 3:38 PM
14	Insufficient education. 24 hours is not enough.	5/2/2015 3:37 PM
15	Again, still not enough, compared to a licensed acupuncturist's training. Please leave this modality safely in the hands of LACs. If a PT wants to needle, they should become an LAC!	5/2/2015 3:13 PM
16	24 hours is 24 hours, insufficient!	5/2/2015 3:08 PM
17	This is not enough training for this procedure!	5/2/2015 3:04 PM
18	WOW, 24 hours! A licensed acupuncturist has 2,800 hours of experience prior to be allowed to practice. If you say "dry needling" has nothing to do with acupuncture (use acupuncture needles, use acupuncture points), then you need to start over. STOP putting a valuable tool into the hands of an unexperienced practitioner.	5/2/2015 3:02 PM
19	As a Naturopathic Medical Student and an acupuncturist student this is inadequate. I am required to take Naturopathic Boards and Acupuncturist boards to prove my competency in Needling. My education requires much more then 24 hours of acupuncture education and clinical supervised rotations.	5/2/2015 2:52 PM
20	Acupuncturists have over 3000+ hours of clinical and didactic training. Dry Needling is Acupuncture. PT's are not adequately trained and are more likely to harm someone. This is not safe to license PT's to insert needles in this manner. This is inadequate training!	5/2/2015 2:46 PM
21	It hardly seems likely 24 hours of contact education is adequate. Is this 24 hours supervised or unsupervised? If unsupervised, this puts the public at risk for being a guinea pig for PT's. If the 24 contact hours are supervised, I would still consider it inadequate to cover the topic with any amount of skill. Again, putting the consumer at risk as a guinea pig.	5/2/2015 2:44 PM

22	There is not enough training time in this new qualification.	5/2/2015 2:41 PM
23	24 hours of training as compared to the 2800+ hours that Acupuncturists must perform? Am I to understand that this is considered adequate training for Physical Therapists?	5/2/2015 2:15 PM
24	the person that wants to practice dry needling technique should have to take an acupuncture board test... there is alot more involved then just putting a needle in someone.	5/2/2015 2:12 PM
25	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:07 PM
26	Would you feel comfortable with a neurosurgeon or a phlebotomist with only 24 hours of training working on you?	5/2/2015 1:04 PM
27	Twenty-four hours is an insufficient level of training to ensure unsuspecting members of the public are not harmed. Local, national, and international organizations and healthcare communities agree: The World Health Organization (WHO), the national Accrediting Commission for Acupuncture (ACAOM), and current Arizona law have set a minimum standard for needling of at least 1,850 hours specifically in didactic and supervised clinical practice in acupuncture (not including bio-medicine education requirements) Arizona law does permit the practice of acupuncture with less training, for the purposes of treating addiction. However, these auricular detox specialists are limited to only 5 points in the ear and must receive 70 hours of training and be supervised by a licensed acupuncturist. Finally, the American Academy of Medical Acupuncture (AAMA) the organization that represents Medical Doctors that practice acupuncture recognizes dry needling as acupuncture and as an invasive procedure. Further, AAMA recommends M.D.'s to have an additional 300 hours of training on top of their four year medical degree and non-physicians (including Physical Therapists) to have 2,000 hours of education and training.	5/2/2015 1:04 PM
28	An insult to all medical professionals with dry needling (ashi acupuncture) as a part of their practice acts, requiring over 1600 hours of study and internship.	5/2/2015 12:41 PM
29	24 contact hours is an insult to what we have learned as acupuncturists. Our Needling Anatomy 1 class has more contact hours than this. There is no feasible way that a therapist can be adequately trained in this period of time. Even chiropractors and medical doctors need at least 100 hours in Minnesota, which is still too low. It is so important that the board consider the risks to the general public and profession if this is to be approved. 24 hours isn't enough, and if approved will release hundreds of under-trained practitioners into the public. Please reconsider.	5/2/2015 11:34 AM
30	Naturopathic programs require 200-300 hours of training, and Oriental medical programs require 2000+ hours. A minimum of 24 hours is a ridiculously low amount of training and calls for great concern for the safety of future patients.	5/2/2015 11:22 AM
31	There is no way you will obtain proper safe training of the use of needles in only 24 hours. It is absolutely vital that you learn needle depths and that is not included anywhere in your training! You need to be practicing this under a licensed acupuncturist as your supervisor so that you really know what you are doing not just in theory. These are people's lives in your hands and though these needles can be quite safe they can also be quite dangerous if you don't know what you're doing. I for one would never go to anyone for anything if they had only received 24 hours of training. I think it illegitimizes your practice as a whole. Like you are trying to skate by and put up some ridiculous paper on your wall saying you did your homework.	5/2/2015 10:17 AM
32	I have been a patient for the past 10 years and I am certain that 24 hours is insufficient training for acupuncture It would be totally irresponsible to allow this type of treatment with this small amount of training. I believe that this places the patient in harms way and will lead to inadequate treatment and potential malpractice.	5/2/2015 10:15 AM
33	Minimum hours woefully insufficient for purposes of both safety and efficacy.	5/2/2015 10:14 AM
34	24 hours is a day, there is no possibility of comprehension of a medicine that requires years of education for the licensed acupuncturist.	5/2/2015 10:09 AM
35	Acupuncturists are required to study for 3 to 4 full years to have needling as a legal part of their licensure. 24 hours is completely unacceptable for an entirely new realm of procedures to be added to the scope of practice for the entire profession.	5/2/2015 9:52 AM

36	Again, 24 hours of training is insufficient. Although, I am satisfied that there will be both a written and practicum exam.	5/2/2015 9:06 AM
37	please see other commenta	5/2/2015 8:48 AM
38	Examination should be conducted under the governing of the NCCAOM national exams.	5/2/2015 8:34 AM
39	This is RIDICULOUSLY too little time!!	5/2/2015 7:56 AM
40	Seeing as "dry needling" is a type of acupuncture, each physical therapist performing "dry needling" should meet the requirements of the NCCAOM testing and take the NCCAOM tests for acupuncture.	5/2/2015 7:49 AM
41	This is outrageous ! 24 hours is not enough time to safely do a "procedure" which should be out of scope for PTs unless they train as acupuncturists	5/2/2015 7:45 AM
42	Acupuncturists often to go the equivalent of medical school. This is totally absorb.	5/2/2015 7:43 AM
43	This is not enough training!!!!!!	5/2/2015 7:42 AM
44	Only licensed acupuncturist	5/2/2015 7:19 AM
45	24 hours of training is dangerous and careless medicine.	5/2/2015 7:16 AM
46	You cannot learn acupuncture in 24 hours	5/2/2015 4:09 AM
47	It should meet national requirements for medical professional, who performs invasive procedures.	5/2/2015 1:01 AM
48	Once again, not enough hours at all. Period.	5/2/2015 12:47 AM
49	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's. This amount of hours is absolutely absurd.	5/2/2015 12:46 AM
50	Minimum should be much more than 24 hours.	5/2/2015 12:42 AM
51	24 hours is unacceptable!	5/2/2015 12:25 AM
52	Physical therapists are currently claiming that dry needling is not based on ancient chinese tenants or theories, yet it seems to be a stolen and renamed therapy because acupuncture has been around for over 2,000 years whereas the term "dry needling" was coined in 1979. Since it is such an ancient medicine, the training required to properly perform it requires at least 4 years of study plus continuing education credits. CEE's are not mentioned at all in this course content. 24 contact of education is no where near sufficient.	5/2/2015 12:14 AM
53	Definitely not enough contact hours.	5/1/2015 11:13 PM
54	Not nearly enough training	5/1/2015 11:06 PM
55	Why not just give PT's the right to perform spinal surgery after 24 hours of training while you're at it?	5/1/2015 11:00 PM
56	24 hours is grossly irresponsible. The only proper requirements are the requirements to complete a masters degree in acupuncture.	5/1/2015 10:53 PM
57	PT's should not be performing acupuncture with out a license to practice acupuncture. "Dry Needling" is a technique in acupuncture. Calling it another name doesn't negate the fact that it is acupuncture.	5/1/2015 10:49 PM
58	Again 24 hours only? Dissatisfied with low level of training. I wouldn't want a massage therapist calling themselves a physical therapist - why? because the PT has had different training, longer hours, more experience. Not some 24hr course. Come ON	5/1/2015 10:39 PM
59	24 hours is not sufficient.	5/1/2015 10:27 PM
60	24 hours of training is so low compare to 1000s of hours that acupuncturist received. Without proper training, this will post a threat to the public!	5/1/2015 10:23 PM
61	NOT ENOUGH HOURS!!!!!!	5/1/2015 10:22 PM
62	That's nothing compared to a LAC training.	5/1/2015 10:12 PM
63	24 contact hours vs. 4 years of education. This is a travesty! You are depriving the people of your state of a real helpful medicine that is much more than just sticking needles in people after 24 hour of class.	5/1/2015 10:06 PM
64	Acupuncturists must have 660 clinic hours under the NCCAOM standards. Physicians must have several hundred hours of training. I implore to reconsider the training requirements. 24 hours of training for this technique is simply not sufficient.	5/1/2015 9:53 PM

65	See comments on section a. 24 hours of training is simply ludicrous for a treatment which includes needling into muscle tissue.	5/1/2015 9:47 PM
66	Not enough training and supervisory hours for safe needling practice	5/1/2015 9:37 PM
67	If Physical Therapists would like to practice any form of acupuncture, they should apply and enroll in an accredited acupuncture school; otherwise, the training is insufficient and should not be allowed.	5/1/2015 9:33 PM
68	24 hours does not equal 1000 hours which is the standard for acupuncturists.	5/1/2015 9:31 PM
69	PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:31 PM
70	This is not enough time for a person to fully understand the concept of Chinese Medicine and the meridians of the body. Physicians take longer education hours than this. This is considered Chinese Medicine and this training is not enough to fully be knowledgeable in treating a patient.	5/1/2015 9:24 PM
71	INSUFFICIENT	5/1/2015 9:17 PM
72	What is being called Dry Needling is actually the practice of Acupuncture. Requiring 24 hours of education is laughably irresponsible, negligent and dangerously insufficient compared to the 2500 hours required for a Licensed Acupuncturist. .	5/1/2015 9:16 PM
73	24 hours of education is entirely inadequate to protect public safety and reduce the risk of harm to patients. The level of education proposed is completely insufficient to provide the PT with enough training to reduce and eliminate the risk of harm to the patient, especially pneumothorax. Similar techniques used by other healthcare professions require significantly more training and documentaion of training. For example, Acupuncturists are required to have over 1,000 hours of clinical training and pass a national board exam in order to practice in the state of Arizona.	5/1/2015 9:08 PM
74	This is a not enough education and frankly criminal compared to the education an acupuncturist has to get to perform acupuncture safely. Dry needling is really just acupuncture given another name.	5/1/2015 9:06 PM
75	This does not specify the degree of difficulty or proficiency required. A meaningful test must have stringent standards.	5/1/2015 8:51 PM
76	Most acupuncture degrees require almost 1,000 contact hours. 24 contact hours is appallingly insufficient.	5/1/2015 8:48 PM
77	Educational requirement is way too low to be exceptable.	5/1/2015 8:31 PM
78	Again, any other medical profession that wishes to utilize acupuncture needles has at least 200 hours of education.	5/1/2015 8:30 PM
79	24 hours of training is insufficient for performing dry needling safely!	5/1/2015 8:21 PM
80	Not enough training time! People will be injured. Check into how many more cases of pneumothorax have happened since PT's started "dry needling".	5/1/2015 8:11 PM
81	Public health risk! 24 hours?! No way. Even medical doctors are required more hours in most states for acupuncture / dry needling techniques!	5/1/2015 8:02 PM
82	As previously commented, that is a dangerously small amount of time that could potentially lead to damaging out comes for the patients of the PT administering the "Dry Needling".	5/1/2015 7:59 PM
83	Needs more/longer training. 24 hours is not enough.	5/1/2015 7:48 PM
84	NOT ENOUGH CONTACT HOURS!!!	5/1/2015 7:41 PM
85	24 hours in not enough time to properly learn how to needle	5/1/2015 7:40 PM
86	Plus over 1000 hours of clinical training.	5/1/2015 7:38 PM
87	Insufficient training hours	5/1/2015 7:35 PM
88	24 hours of education...I would never let someone treat me for anything who had only 24 HOURS of training. What are you thinking?	5/1/2015 7:31 PM
89	Your course content is sub standard and patients deserve better.	5/1/2015 7:28 PM

90	24 hours is not enough, this is dangerous!	5/1/2015 7:22 PM
91	Stop pretending you are acupuncturists: you aren't.	5/1/2015 7:15 PM
92	This is not enough training. It is a public safety risk.	5/1/2015 7:07 PM
93	24 hours is not sufficient as previously stated.	5/1/2015 6:55 PM
94	Acupuncturists go to school for 3-4 years to learn this style of healing. You can't learn it in 24 hours.	5/1/2015 6:55 PM
95	1200-2000 clinical hours	5/1/2015 6:49 PM
96	There needs to be a minimum of supervised clinical patient contacts.	5/1/2015 6:49 PM
97	PT's should not be needling people	5/1/2015 6:48 PM
98	Exams: The dry needling privilege in the state of Florida is close to 3000hrs (FL Statue 457). I would not refer patients in AZ to receive dry needling in AZ.	5/1/2015 6:47 PM
99	You are risking the reputation of PTs all over the country. Not to mention the countless people that can get hurt by MINIMALLY trained PTs.	5/1/2015 6:47 PM
100	24 hours is not nearly a sufficient amount of training. These people will be inserting a medical device into patients. It is irresponsible and reckless to have so little training. the safety of patients is at stake- there have been numerous injuries such as pneumothorax by insufficiently trained PTs. I beg you to reconsider.	5/1/2015 6:46 PM
101	There should be some type of license or certificate, not just a paragraph explaining the class. It should be standard and accredited.	5/1/2015 6:38 PM
102	Please see previous comments.	5/1/2015 6:34 PM
103	24 hours is a totally unacceptable length of training for this invasive procedure. There have already been patients with injuries such as pneumothorax or dropped lung from PT's. Their schooling does not include intensive training on performing an invasive procedure that includes inserting sterile needles into a pts body.	5/1/2015 6:30 PM
104	Too little training by an unqualified organization	5/1/2015 6:27 PM
105	This is	5/1/2015 6:26 PM
106	Patients will be harmed. Lungs will be punctured. Blood born pathogens will be passed. You are severely compromising the safety of the public by passing this law with such insufficient training.	5/1/2015 6:24 PM
107	There is absolutely no way that 24 hours of training can begin to cover proper needling technique. The fact that this requirement is being suggested only further proves the point that the "regulatory" measures proposed by this bill do not take patient safety into account. Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason.	5/1/2015 6:20 PM
108	Though should not be allowed to needle anyone. This is so unsafe!	5/1/2015 6:19 PM
109	I do like the fact the practice application course content and examinations shall be done in person. Yet, I still feel there is NO viable way that any PT student can grasp the knowledge, point location, red flags, potential side effects, treatment protocol, and so much more within the minimal amount of time. They are trying to teach them acupuncture of a minor scale and it is NOT ok.	5/1/2015 6:18 PM
110	24 hours of training is not adequate.	5/1/2015 6:18 PM
111	24 hours is an insufficient number of hours to be trained on needles and the proper use so as not to harm the patient. Current Acupuncture (aka dry needling) education requires 1000+ hours to be properly trained on the uses, sterilization, and proper procedures by professionals. 24 hours of training can lead to ill prepared and negligent practitioners who pose a significant harm to their patients, the profession, and the public perception of the practice.	5/1/2015 6:16 PM
112	Passing a test on anatomy and clean needle technique does not justify practicing Chinese Medicine with no training of Chinese Medicine.	5/1/2015 6:10 PM
113	That's a little thin for unrestricted needling.	5/1/2015 6:05 PM
114	Again illegal to practice Acupuncture with 24 hours of training!	5/1/2015 5:58 PM
115	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:57 PM

116	24 hours is not enough hands on time. As an acupuncturist, we had in just needling over 100 hours classroom training. Then we had another year practicing on people other than classmates. We already knew our anatomy like PT's. 24 hours hands on does not come anywhere close to the practice the PT's need. It is dangerous.	5/1/2015 5:52 PM
117	Not enough training hour. Period.	5/1/2015 5:50 PM
118	To be quite clear, the act of inserting an acupuncture needle into the body, under any pretense, or for any purpose whatsoever, is the practice of acupuncture. "Dry needling" is far outside both physical therapists' scope of practice and their scope of education and training. In most states, to become a licensed acupuncturist, an applicant must complete a minimum of 1,905 hours of education and supervised clinical training (1,245 hours of education and 660 hours of supervised clinical training). Yet you are wanting physical therapists who are not licensed by law to practice acupuncture are inserting acupuncture needles (up to four inches or more in length) into unsuspecting patients with 24 hours of training!!!! "Dry needling" was first described over 2,000 years ago in China's earliest and most comprehensive extant medical treatise, the Yellow Emperor's Inner Classic (Huangdi neijing), where it discusses in detail using tender or painful points, also known as "trigger points" or "motor points," to treat pain and dysfunction, particularly of the neuromusculoskeletal system. Simply described, "dry needling" involves inserting an acupuncture needle into a tender or painful point and then appropriately manipulating (rotating and/or pistoning) it for therapeutic purposes. The Food and Drug Administration (FDA) classified acupuncture needles as Class II medical devices subject to strict regulations under the federal Food, Drug, and Cosmetic Act (FDCA) and FDA's regulations. Individuals purchasing or receiving acupuncture needles who are not licensed by law to practice acupuncture are directly violating both civil and criminal provisions of the FDCA intended to protect public safety. 21 U.S.C. § 331(a)-(c), (g). These include the FDA's requirements that acupuncture needles can only be sold to "qualified practitioners of acupuncture." 61 Fed. Reg. 64616 (December 6, 1996). FDA prescription labeling requirements themselves specifically prohibit the sale of acupuncture needles to anyone who is not a qualified practitioner of acupuncture. The required FDA prescription labeling on the package from which acupuncture needles are to be dispensed states: "Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the States." 21 CFR § 801.109(b)(1) (emphasis added). Any individual who is not licensed by law to practice acupuncture is directly violating the FDCA and FDA's civil and criminal prohibitions when they purchase or receive acupuncture needles for use in "dry needling."	5/1/2015 5:46 PM
119	Dry needling is an acupuncture technique. The educational requirements for an entry level practitioner of acupuncture is a minimum of master's degree in acupuncture and/or oriental medicine. Most M.Ac. programs require a minimum of 123 credit hours to be completed over a course of 3 years.	5/1/2015 5:42 PM
120	Not enough training for safe application of modality. Require 1,000+ hours	5/1/2015 5:42 PM
121	24 hrs is a laughably small amount of training for a healthcare provider to fully understand the dangers and benefits of sticking needles into someone's body.	5/1/2015 5:32 PM
122	Once again, 24 hours is absolutely insufficient training. Patients will be at risk for pneumothorax, hematoma, and nerve damage	5/1/2015 5:30 PM
123	A full four year degree should be required of any practitioner.	5/1/2015 5:26 PM
124	24 hours is NOT enough time to learn how to provide "skilled intervention".	5/1/2015 5:22 PM
125	A ridiculously minimal amount of education in the usage of acupuncture needles and their insertion into the body in any area. This should mirror the educational requirements for NCCAOM certified acupuncturists.	5/1/2015 5:18 PM
126	24 hours of training is absurd and a huge safety concern! Physical Therapists should have to meet the 2,000 hours of training requirement set forth by the American Academy of Medical Acupuncture to be able to perform "dry needling".	5/1/2015 5:18 PM
127	The required time should be significantly increased	5/1/2015 5:08 PM
128	Increase minimum hours to 500	5/1/2015 5:06 PM
129	Far more training needed to protect the public	5/1/2015 5:04 PM
130	Paragraph C is NOT approved and those entities should not be providing guidance on dry needling.	5/1/2015 4:54 PM
131	Insane to think 24 hours of education can allow someone to put a needle into another person. It took 2 years of training before allowed to needle another person in acupuncture school	5/1/2015 4:46 PM
132	24 hours...Really? I have over 2,500 hours of education and training. This is truly a danger to the general public.	5/1/2015 4:46 PM
133	I do not want to be needled by practitioner who had his training only 24 hours. Just not professional!	5/1/2015 4:43 PM

134	As this content would normally be tested under board licensure from a national standard, it is ridiculous to set such a low bar as a quiz at the end of a few hours. If minimum contact time is to be considered, most states that allow acupuncture from a physician require at least 300 hours contact time. It feels like you are trying to skip any reasonable standard other professions have established.	5/1/2015 4:40 PM
135	minimum of 24 contact hours are not enough!	5/1/2015 4:28 PM
136	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:26 PM
137	ARE YOU KIDDING ME!	5/1/2015 4:22 PM
138	Not enough training hours required	5/1/2015 4:10 PM
139	Total minimum contact hours of education should not be less than 1500 hours.	5/1/2015 3:51 PM
140	24 hours is NOT a sufficient amount of training for a PT to perform acupuncture (dry needling). As a Licensed Acupuncturist myself, I was required to obtain over 1,000 hours of training. Therefore I feel there is a serious public safety concern due to their lack of education and training in needing. I feel it would be in the best interest of consumers/patients to require more training for PTs who wish to needle.	5/1/2015 3:33 PM
141	Couldn't get near me	5/1/2015 12:45 PM
142	24 hours is 3 days. 3 days to learn acupuncture? That is the most ridiculous thing I've ever heard. What if acupuncturists were going to start becoming "physiotherapists" on the side. What if the course to become a physiotherapist was 24 hours? Doesn't that just seem so, so incredibly wrong?	5/1/2015 11:15 AM
143	24 hours is not enough training unless you are telling me that the person can know all the points in the body that are safe to puncture people in 24 hours when in fact it takes a number of years to know that information.	5/1/2015 8:38 AM
144	Not enough hours	5/1/2015 6:28 AM
145	Not nearly enough education	5/1/2015 2:11 AM
146	24 hours is not enough training.	5/1/2015 12:08 AM
147	See first comment	4/30/2015 11:05 PM
148	Really? Passing a written exam? 24 hours of education? Are you kidding me? No. Just no.	4/30/2015 10:16 PM
149	24 hours of training is dangerously inadequate. The standards set to pass a written and practical test after a mere 24 hours of training is simply ridiculous and puts the public at risk of severe injury.	4/30/2015 9:52 PM
150	Paltry and dangerous.	4/30/2015 8:31 PM
151	Too vague about this 'examination' process.	4/30/2015 8:24 PM
152	Again, not enough time to make me feel that they would be competent and not a danger to their patients.	4/30/2015 7:47 PM
153	See my response to section A	4/30/2015 7:10 PM
154	Ridiculous amount of time to require. I would be afraid to be dry needled by anyone with only 24 hours of experience.	4/30/2015 7:09 PM
155	Deficient training	4/30/2015 6:17 PM
156	A 24 hour minimum is terrifyingly low, especially considering how dangerous the consequences of the mistakes that can be made.	4/30/2015 6:06 PM
157	The minimum training of 24 contact hours of education should be changed to 200/300 hours of contact education hours and training.	4/30/2015 5:47 PM
158	that's an absurdly low number of hours, then clients come to me as an acupuncturist having had a bad experience with a dry needler. It's not enough. An acupuncture license should come after a masters in acupuncture is completed.	4/30/2015 5:46 PM
159	!	4/30/2015 4:18 PM
160	Contact hours should be increased to the minimum required by the state acupuncture board	4/30/2015 2:50 PM

161	My greatest concern is safety, as I believe that 24 hours of training is woefully insufficient and puts the public at risk. It also risks great damage to your profession because even on its face, two weekends of training is substantially low. -The international (WHO), national (www.ACAOM.org), and current Arizona standard for needling is at least 1850 hours specifically in didactic and supervised clinical practice in acupuncture (1200 if you exclude the biomedicine sciences). Anything less by a non-primary care physician (MD) endangers the public. - Arizona does permit the practice of acupuncture with less training than what is required nationally and by Arizona, for the purposes of treating addiction. In order to practice, these auricular detox specialists are limited to a standardized treatment of 5 points in the ear. The training required for this limited treatment is 30 hours of didactic classroom time with 40 hours of supervised clinical practice. These 70 hours limit the practitioner to the single treatment in the ear. This guarantees some level of skill in administering this specific, limited treatment. Requiring only 24 hours for needling training (without any supervised clinical training) anywhere in the body ensures no skill whatsoever.	4/30/2015 2:08 PM
162	the requirement hours should be at least 1000 hours of supervised practice	4/30/2015 2:04 PM
163	THIS IS NOT ENOUGH TRAINING TO BE DOING DRY NEEDLING! EVEN CHIROPRACTORS AND MEDICAL DOCTORS HAVE 200 HOURS OF TRAINING!	4/30/2015 1:51 PM
164	As someone who has already been through the dry needling certification course, will be required to undergo a written and practical exam again to prove my qualification? I've been performing dry needling for the past 2 years.	4/30/2015 11:52 AM
165	This is ridiculous-acupuncture requires A minimum of 1,850 hours of training. Of the 1,850 hours, at least 800 hours must be in Board approved clinical training.	4/30/2015 11:44 AM
166	24 hours????no one can grasp the concepts in 24 hours	4/30/2015 10:00 AM
167	completely inadequate in theory and application as well as technique. see NCCAOM and MD training requirements for needling in actual acupuncture training and or medical acupuncture training. the	4/30/2015 9:30 AM
168	Again, I believe a 3 month course would be an absolute minimum.	4/30/2015 7:05 AM
169	The course is not adequate to prepare for any testing.	4/30/2015 2:08 AM
170	Not nearly enough education. Way to bastardize medicine	4/30/2015 12:23 AM
171	A provider of education cannot provide certification-- it is in inherent conflict of interest. 24 hours of education has proven to be inadequate to protect the public against serious adverse events. With the demonstrated increased injury to the public, the PT Board would be negligent to adopt such a low standard.	4/29/2015 9:31 AM
172	Patients to practice upon would be needed to satisfy my command of acupuncture. This would be provided in an acupuncture institution. Twenty four hours is a good start, but I would think more like 100 hours would be better for a variety of patients and scenerios.	4/28/2015 10:37 PM
173	There is no indication as to the standards and competencies for the exam, and the skills and experience needed for expertise in drafting questions. More importantly, without any required supervised clinical training or sufficient minimum hours of clinical training required, there is nothing to test in a practical exam.	4/28/2015 10:05 PM
174	24 contact hours for training in a new invasive technique is seriously inadequate.	4/28/2015 4:16 PM
175	24 hours to practice acupuncture is an extremely small training class.	4/27/2015 6:36 PM
176	24 hours is not enough training. This presents a danger to the public.	4/26/2015 5:50 PM
177	24 hours is not even enough time to learn how to insert needles correctly and safely, let alone knowing how to use them.	4/25/2015 12:26 AM
178	Dry needling is acupuncture	4/24/2015 8:38 PM
179	A three day class is not enough time to cover even the safety protocols.	4/24/2015 6:42 PM
180	Physical therapist initially approving other Pts in dry needling that are not sufficient in the practice of such is not adequate	4/24/2015 6:06 PM
181	I would NEVER trust anyone with only 24 hours of training to "dry needle" me. I have had many clients tell me that PT's put needles into them without permission and that it only exacerbated the condition making the pain much worse. If PT's want to practice acupuncture or dry needling they should be held to the same standards as Licensed acupuncturists.	4/24/2015 5:55 PM

182	PT have less medical training than an MD, ND, DC or L.Ac to perform with needles or even have the knowledge to use them. Under trained. Public safety violation	4/24/2015 4:53 PM
183	Again inadequate training.	4/24/2015 4:20 PM
184	Minimum training should be approximately 1500 hours and examination should be oassage if National Commission for the Certification of Acupuncturists (NCCAOM) certification examinations.	4/24/2015 3:28 PM
185	This is not even close to enough hours. This is unsafe for patients. I strongly urge this to be denied. Acupuncturist, depending on the state have 2,500 contact hours of education. This is because anything less is unsafe.	4/24/2015 2:48 PM
186	What sort of test that is given as part of 24 hrs of training can really tell if the PT will harm someone. Needling should be practiced in a safe learning environment before being told to go practice on your patients.	4/24/2015 2:31 PM
187	24 hours of training is unethical and dangerous! it is absurd to think that this is enough! pts have a great reputation for being able to really help people, and that is going to be seriously jeopardized by this!. this is an unethical rush to use a technique that works by theses properly trained. completely unethical! and dangerous to the public!!!	4/24/2015 1:51 PM
188	To use an acupuncture needle, acupuncturists train for over 1,000 contact hours. 24 hours is not sufficient to use the tool of an acupuncture needle to safely treat patients.	4/24/2015 1:01 PM
189	Physiotherapists are not trained well enough and they don't deserve to take food away from my children. I have 11 kids	4/24/2015 12:26 PM
190	Once again, "dry needling" is a neutral term for acupuncture. This is a highly specialized field of practice requiring years of study in most countries. I consider this a danger to public safety.	4/24/2015 10:45 AM
191	Again disturbing that the training is so lacking and the oversight is provided by fellow physical therapists	4/24/2015 12:43 AM
192	You're missing the 4 years masters program in Acupuncture!	4/24/2015 12:06 AM
193	As stated previously, 24 hours of training is fully inadequate and completely flies in the face of public safety. The Physical Therapy Boards are putting the public at risk and performing Acupuncture without a license.	4/23/2015 10:31 PM
194	They should be made to take the same examination as everyone else who does this type of work and be made to be accredited through the NCCAOM (organization that governs acupuncture and safety). Acupuncturist have over 3000 hours hands on education before ever being certified. It is obvious that the physical therapist are writing there own laws to get away with hurting people.	4/23/2015 9:07 PM
195	Go through the same process as a licensed acupuncturist. If you don't, you are doing a great disservice to the public.	4/23/2015 8:36 PM
196	With only 24 hours of education, this is a serious threat to public safety.	4/23/2015 8:33 PM
197	This is not enough time to learn needling depth, which varies around the body. Not enough time to learn needling technique. Most of the acupuncture malpractice is from P.T.s and massage therapists needling incorrectly.	4/23/2015 5:37 PM
198	Acupuncture (theory and technique) training should be required of anyone needling a patient and I am a licensed PT.	4/23/2015 3:02 PM
199	24 hours is a drop in the bucket as compared to the training of licensed acupuncturists. 24 hours barely gives enough time to cover safety, contraindications and anatomical review- let alone effective needling techniques, indications, point selection & location, etc. 24 hours constitutes the equivalent of a "weekend warrior" course, and is grossly inadequate. If you do an internet search of "acupuncture adverse events" or "dry needling adverse events," the most serious cases of injury (e.g. pneumothorax) are procedures performed by chiropractors and PTs- not licensed acupuncturists. Clearly this indicates chiros and PTs are not being properly trained, as there are numerous more patient visits to an acupuncturist for needling procedures than PTs and chiros combined. Clearly if an acupuncturist wanted to expand his/her scope of practice to include chiropractic or PT techniques, more than 24 hours of education would be necessary, not just to protect patient safety, but also to ensure likelihood of efficacious results.	4/23/2015 12:29 PM
200	There is no provision for Chinese medical theory and its application.	4/23/2015 12:06 PM
201	Acupuncturists are required to have 660 hours of supervised clinical practice in addition to dozens of hours of point location and needle technique- independent of any TCM theory. Although we take Anatomy and physiology, the states deem this level of training necessary for us to be able to safely treat the public with needles. PT's should have the same expectation and requirement.	4/23/2015 8:34 AM

202	24 hours is not enough training to be safe & effective. Look at the CA laws & lawsuits please not just to the PTs running the programs to make money.	4/23/2015 8:33 AM
203	They cannot possibly know how to safely needle with these few hours.	4/23/2015 7:50 AM
204	Physical Therapists should not be allowed to perform acupuncture, which dry needling is a form of with 24 contact hours. There is already a licensed profession to perform this therapy and they are called Acupuncturists, who have gone through 100's of hours of training to insert needles into the muscles and tissues to promote healing. Acupuncturists do not just treat "meridians" they treat muscles and motor points as part of their scope of practice.	4/23/2015 6:59 AM
205	PTs should not perform Dry Needling (unless you allow massage therapist to perform physical therapy?)!!!	4/23/2015 6:43 AM
206	But qualifications do not seem to require any practice time? Again, acupuncturists have thousands of hours of supervised practice; PTs will have 0 hours?	4/23/2015 5:50 AM
207	24 contact hours is way too low of a number of contact hours. This should really be bumped up to about 300 bare minimum.	4/22/2015 10:45 PM
208	24 hours of instruction is woefully insufficient. The international standard for performance of acupuncture (of which, dry needling is one form) is 2000 hours. The US standard is 3000 hours. The American Association of Medical Acupuncture suggests a minimum of 500 hours of training for MEDICAL DOCTORS to be able to perform dry needling or acupuncture. Chiropractors who wish to be certified in dry needling are required to take 200 hours. PT's say they don't need acupuncture theory, but acupuncturists are required to have 660 hours of supervised clinical practice in addition to hundreds of hours of point-location and needle technique instruction-independent of any acupuncture theory. The states have determined that this level of practice and supervision is necessary to ensure public safety even though acupuncturists have the same training in anatomy and physiology as PT's.	4/22/2015 10:19 PM
209	no mention of clinic internship	4/22/2015 9:55 PM
210	It is absurd to believe a qualified 'acupuncturist' can avoid injury and treat a patient holistically in a minimum of 24 hours. Qualified practitioners spend over 3,000 hours in training.	4/22/2015 9:46 PM
211	Passing both a written and oral exam is good, but 24 hours is not enough training	4/22/2015 9:27 PM
212	Education should be much more than 24 hours and should amount to what acupuncturists must learn before needling.	4/22/2015 9:23 PM
213	This is not a qualified board.	4/22/2015 9:20 PM
214	Not enough training to be safe.	4/22/2015 9:16 PM
215	I think, again, horrified comes to mind for part 4 (minimum 24 hours training). This is just a weekend workshop to put needles, often deep, under the skin. Pts have never before been allowed to break the skin in any way. There is no "culture" of being adequately trained to do so. I have heard of PTs consistently causing large bruised areas when doing "Dry Needling". That speaks to poor needling technique. I am receiving PT now. I have received acupuncture treatments in the past. I know the acupuncturists have much more hours (hundreds) just in needling. How can anyone learn this skill in 24 hours. I cannot see a PT without at least 350 hours just in indications, contraindications, angles, depths, outcomes, plus at least 150 hours in hands-on supervised clinic. Plus the need of PTs to be thoroughly trained in Trigger Pt work which, I gather, is the basis for Dry Needling treatment. This draft does not cover anything about that being a prerequisite. One other thing: Other than Acupuncturists with between 1500-2300 hrs of training and hundreds in clinical, and Medical Doctors (MD, DO, ND), all professionals who insert needles under the skin (NP, RN, PA and Auricular Acupuncturists) must work under the supervision of a Medical Doctor. Why would a masters level PT or even a Doctoral Level Pt who has no real training in insertion beneath the skin not have to work under the supervision of a Medical Doctor?	4/22/2015 7:20 PM
216	I feel this is a potentially dangerous precedence that others may use to create further practices that will be unsafe to patients.	4/22/2015 6:27 PM
217	Public interest will be in danger with the short amount of time that PT think that they can master what acupuncturist get the education for years to accomplish that	4/22/2015 5:22 PM
218	ridiculously low hours required, a reasonable minimum would be 1800	4/22/2015 5:22 PM
219	Should have to pass national acupuncture boards	4/22/2015 4:50 PM
220	See number 10: The education requirements are not nearly enough. Why do the dry needling? What is the expected outcome? What is the physiology behind it? etc....	4/22/2015 4:49 PM
221	see previous comment regarding minimum number of hours	4/21/2015 11:02 AM

222	I feel that 16 contact hours is appropriate for extremity treatment. And an additional 16 hours for spinal treatments at a level #2 training.	4/21/2015 10:37 AM
223	24 contact hours of education is not enough	4/19/2015 11:34 AM
224	Will the passing of these courses/exams be filed with the board? If yes, I would suggest a fee associated with the exam so the state has this information on file.	4/14/2015 9:15 AM
225	PT's teaching PT's how to do acupuncture... just because they have been told that they are experts and highly qualified and that so called dry needling is their invention?!?! Nope, completely unsatisfactory.	4/13/2015 8:03 PM
226	I strongly agree with a practical exam. Some therapists don't have good manual skills or hands. Not sure about all the contraindications but I would want someone who is confident to know what they are doing before sticking needles in me.	4/12/2015 7:21 PM
227	24 hours is a joke! Licensed acupuncturists have completed well over 3000 hours. Medical acupuncture (for physicians) generally requires at least 300 hours. Even for the smaller subset of acupuncture skills used in "dry needling", 24 hours is not nearly enough time to learn how to needle safely and effectively.	4/11/2015 2:34 PM
228	You can't make a silk purse out of a sow's ear no matter what tags or labels you put on it or testing you do to try to prove otherwise.	4/11/2015 6:37 AM
229	The total minimum contact hours of 24 hours is ludicrously inadequate to ensure PT does no harm and actually achieves benefits and health gains for consumer. Consumer better off seeing acupuncturist and PT should refer this out rather than presume they can adopt this modality with any efficacy or sane level of safety with just 24 hours of training. Acupuncturist training entails 1800 supervised clinical hours before completing their degree program and then they take a national board exam to further demonstrate their knowledge of how to safely and properly administer acupuncture. Dry Needling is acupuncture. Typical continuing education training is 15-24 hours so rather than being skillfully educated to properly perform and understand the nuanced and sophisticated effects of inserting needles and puncturing the skin, this ruling allows PTs to perform dry needling (using the very same needles used in acupuncture) with inadequate preparation and knowledge. Why? Simply being able to bill for the service is not justification to offer it. This ridiculously low training standard is sure to discredit the profession of physical therapists and put people at risk for severe and unnecessary injuries by unskilled PTs. A training minimum greater than that for MDs would take into account their anatomy and physiology training, but anything less than 1,000 hours of supervised clinical training makes a mockery of the elegant systems thinking associated with acupuncture for centuries and tells the public that their safety, comfort, and health outcomes mean less than the profit motive.	4/10/2015 3:54 PM
230	24 contact hours of education is a woefully inadequate number of hours to practice the art of Dry Needling! To learn the energetics underlying the trigger point being needled takes many many hours of study and practice. Shame on you! Physical therapists are not qualified to judge training requirements for dry needling!	4/10/2015 2:51 PM
231	Depends upon the rigor & the content	4/10/2015 2:15 PM
232	More than 24 hours required	4/10/2015 1:40 PM
233	24 Hours!!! That is ludicrous	4/10/2015 11:38 AM
234	Only 24 contact hours of education???? Very scary.	4/9/2015 10:04 PM
235	This paragraph establishes no standardized testing and eliminates the possibility of any regulation or consumer confidence in the qualifications of the Dry Needling provider. The test can be drawn up by the 24 hour continuing education provider with the possible conflict of interest being the successful passing of all it's students. This promotes a lack of quality assurance for the public health and prevents any standardization for evaluating the competency of practitioners. There is no provision for any regulation or standard of care. A minimum of 24 hours of education resembles a weekend continuing ed workshop and is a significantly inadequate amount of time to provide necessary education to safely provide practitioners with adequate training.	4/8/2015 12:43 PM
236	typo in sentence 4.	4/7/2015 9:02 AM
237	Agree with need for practical examination as well as content exam.	4/6/2015 10:08 PM
238	Consider a provision for those therapists already practicing dry needling.	4/6/2015 9:35 PM
239	No supervision after completion of the course? I think this is a little lenient.	4/6/2015 7:34 PM
240	I don't feel that written and practical examination are a needed requirement. I do AGREE that the application course content be in person/hands on.	4/6/2015 4:04 PM

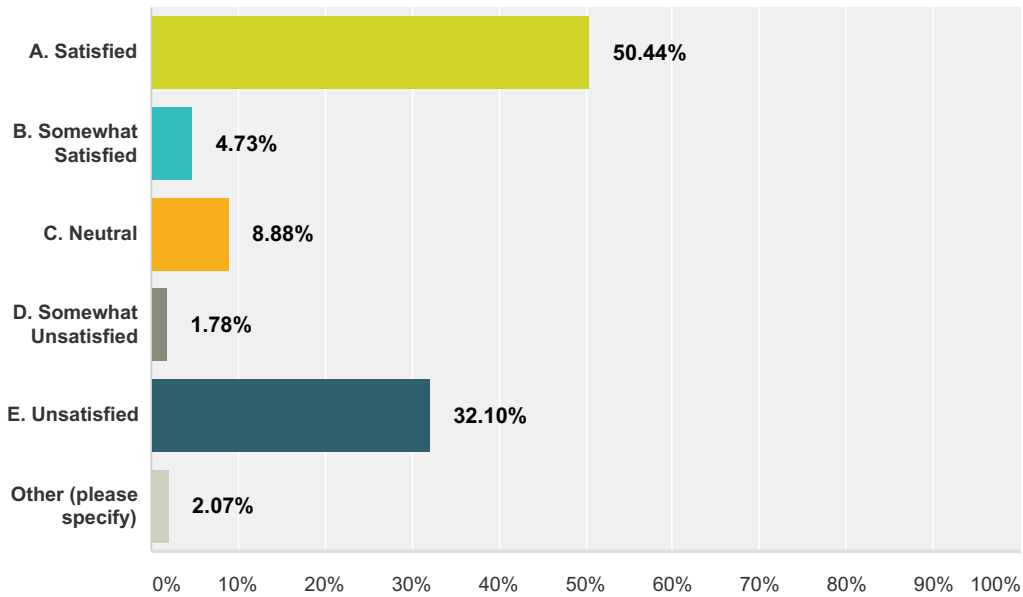
241	Only 24 contact hours would leave out the time it takes to cover most muscles. It should at least specify that muscles not yet covered in course content should not be dry needled.	4/6/2015 9:28 AM
242	This requirement is way too prescriptive and restrictive.	4/5/2015 10:26 AM
243	Same	4/5/2015 9:40 AM
244	If passing a practical examination already, I do not think it should be required to pass a written exam. If one is able to demonstrate the correct skill based on everything taught in the course then one is believed to have mastered course content. I believe a practical examination is of utmost importance when becoming certified in dry needling versus a written exam.	4/5/2015 8:51 AM
245	will the written exam need to be saved by the course instructor to then be shown to the AZ board if they request it?	4/5/2015 7:56 AM
246	Minimum 24 contact hours may limit courses/certifications available	4/5/2015 7:50 AM
247	Standards need to be established for the examiners and those being tested	4/4/2015 8:04 PM
248	I think a minimum of 75 hours should be required. There is a lot to learn.	4/4/2015 7:24 PM
249	I agree with having a written and practical examination so that the dry needling skills are being assessed by some one skilled in the process before licensure is able to be attained	4/4/2015 9:25 AM
250	Can the written exam be completed online instead of in person?	4/4/2015 9:23 AM
251	Again, I would be more comfortable if it was a more seasoned therapist who just took 1 DNT course. I feel a newer PT should have to take 2 classes / levels of certification. Experience in the field does make a difference.	4/3/2015 11:22 PM
252	The requirement for both a written examination and Practical test is not practical and can extend course hours and take away from hands on instruction. Ex. the OCS of the APTA requires only one form of testing. When courses are approved "practical exams or written exams" tested,	4/3/2015 10:23 PM
253	same	4/3/2015 9:01 PM
254	see previous comments regarding the written and practical examination	4/3/2015 6:10 PM
255	Most of the certification courses do not add up to 24 contact hours.	4/3/2015 5:28 PM
256	Any guidelines for this written and practical exam? What motivation do organizations that provide training have to make this examination sufficiently rigorous to be meaningful?	4/3/2015 4:30 PM
257	Educational hours coupled with a practical and written exam are very appropriate.	4/3/2015 2:46 PM
258	Same	4/3/2015 12:08 PM
259	Feel the contact hours in education should be higher than 24	4/3/2015 10:25 AM
260	Looks like a typo in sentence 4, "shalt total" instead of "shall total"	4/3/2015 10:20 AM
261	Is 24hrs what most courses available are in duration or will that make it more difficult to find a course in order to become certified. can have necessary skills and knowledge you attained in shorter amount of time or is that the consensus of how long it will take to acquire the skills and knowledge to be confident and competent	4/3/2015 9:55 AM
262	The content is described well and the requirement for a written and practical examination is very good. However, I do not see any requirement for credentials for the individual who is teaching the course. Establishing the expertise and current knowledge of the individual teaching the course is as important as requiring individuals to take the course. This is a major oversight in the rule.	4/3/2015 9:26 AM
263	no comment	4/3/2015 8:49 AM
264	I would never go to an acupuncturist that only had 24 hours of contact training. Dry Needling should meet the state license standards for Acupuncturist which I hope is more than 24 hrs	4/3/2015 8:17 AM
265	Strongly agree. Physical Therapist must demonstrate the cognitive and psychomotor skill required to safely and effectively deliver the treatment.	4/3/2015 7:37 AM
266	Needs more	4/3/2015 7:05 AM
267	Will current course offerings taken prior to July 2015 be honored that do not meet the 24 contact hour requirement?	4/3/2015 6:09 AM

268	If a PT is going to be dealing with sharps, blood pathogens and sticking needles into someone, I would want them to have more training than a 3 day weekend class.	4/2/2015 11:45 PM
269	I don't feel that many hours is necessary	4/2/2015 11:33 PM
270	I think 24 hrs is excessive. These should be a weekend course of 16 hours	4/2/2015 10:53 PM
271	Section C4: shall? 24 hours seems reasonable.	4/2/2015 10:33 PM
272	I believe that 24 CEU's are not enough to qualify a PT to provide safe and effective dry needling. I believe that a specified period of time for in-the-room supervision of dry needling needs to occur before a written and practical test are administered. I would personally not feel comfortable receiving dry needling from a PT who had completed only a weekend course in it.	4/2/2015 10:12 PM
273	Supervised hand on application of this modality?	4/2/2015 10:09 PM
274	spell the word "shall" correctly	4/2/2015 10:01 PM
275	one written and one practical should be enough for examination, not costly multiple testing	4/2/2015 9:56 PM
276	practical and written examinations are satisfactory to assess one's ability to perform said procedure	4/2/2015 9:47 PM
277	Correct.	4/2/2015 9:45 PM
278	24 hours in class is a bit much. One weekend course only counts for 12-16 hours	4/2/2015 9:01 PM
279	Practical exam should be conducted by person associated with approved course, the person themselves should be approved the practical exam questions of the course be reviewed by the bodies approving the course	4/2/2015 8:00 PM
280	This is what most courses are offering.	4/2/2015 7:55 PM
281	No comment	4/2/2015 7:29 PM
282	There are a lot of questions with this one. Will there be tests after all continuing ed courses?? Does this set a precedent for future innovations? Will instructors automatically pass participants who have paid copious amounts of money for their course??	4/2/2015 7:25 PM
283	I understand that having two tests written and practical would definitely add credibility to the cause, I just wonder how much of a difference it would make if only a practical examination was only required?	4/2/2015 7:16 PM
284	Does not state whether those hours can be acquired through multiple courses. For example if dry needling of the lower extremity course is only 16 hours, can one then take an upper quarter class separately for another 16 hours and be able to supply the board with documentation and passing of both courses to allow use of this modality.	4/2/2015 6:54 PM
285	24 hours is an excellent time for content knowledge learning for 12 civic skill area thank you for this suggestion	4/2/2015 6:51 PM
286	Satisfied but curious about therapists who have already completed training and are currently practicing dry needling successfully. I would hate to have to take more courses??	4/2/2015 6:44 PM
287	Not sure of the examining procedures of all entities offering courses. Seems like if they are giving a certificate of completion that should include their own acknowledgement that the person taking the course was deemed appropriate to use the skill. I don't think a formal exam written or oral would always need to be done.	4/2/2015 6:36 PM
288	I don't think 24 hours is enough-	4/2/2015 6:18 PM
289	written exam should not be required	4/2/2015 6:17 PM
290	Requiring 24 hours of continued education and written examination is arbitrary and capricious, duplicative, and wasteful. Physical therapists are already required to pass board examinations and have an obligation to perform procedures with competence. Just as there is no specific requirement for manual therapists to undertake written exams before mobilising the cervical spine, there should be no specific requirement addressing dry needling techniques. The requirements are already contemplated by the regulations.	4/2/2015 5:59 PM
291	Way too little time to understand the neurological implications of this procedure. That is after all what is being treated. 150 hours minimum.	4/2/2015 5:56 PM
292	I don't see the need for such tests.	4/2/2015 5:35 PM
293	A minimum of 24 contact hours will not provide the therapist sufficient training to properly perform dry needling on all regions of the body.	4/2/2015 5:21 PM

294	What is the rigor of this written exam? Some organizations will basically provide an open note/open book exam with 10 questions. Others will provide a closed note/closed book large exam. Also, what is required of this practical exam? What skills are necessary? I think there is some work needed to determine how competency will be assessed.	4/2/2015 5:19 PM
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Q13 Please describe your satisfaction with Section D of the draft rules. Section D.D. THE STANDARD OF CARE FOR THE INTERVENTION “DRY NEEDLING” INCLUDES, BUT IS NOT LIMITED TO THE FOLLOWING:1. “DRY NEEDLING” CANNOT BE DELEGATED TO ANY ASSISTIVE PERSONNEL.2. CONSENT FOR TREATMENT FOR THE INTERVENTION “DRY NEEDLING” IS THE SAME AS REQUIRED UNDER A.A.C. R4-24-301.3. DOCUMENTATION OF THE INTERVENTION “DRY NEEDLING” SHALL BE DONE IN ACCORDANCE WITH A.A.C. R4-24-304.

Answered: 676 Skipped: 140



Answer Choices	Responses	
A. Satisfied	50.44%	341
B. Somewhat Satisfied	4.73%	32
C. Neutral	8.88%	60
D. Somewhat Unsatisfied	1.78%	12
E. Unsatisfied	32.10%	217
Other (please specify)	2.07%	14
Total		676

#	Other (please specify)	Date
1	Irrelevant	5/2/2015 3:14 PM
2	Very unsatisfied	5/2/2015 8:50 AM
3	weirded out	5/2/2015 7:44 AM
4	no opinion	5/2/2015 12:48 AM
5	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:26 PM
6	.	5/1/2015 3:50 PM
7	See my response to section A	4/30/2015 7:10 PM
8	Horrified!	4/24/2015 12:07 AM
9	grossly unsatisfied	4/23/2015 5:42 PM
10	see comment	4/23/2015 3:04 PM
11	Seems to be a set of protocols that they want to perform with their own standards and know nothing about Acupuncture modality. in fact think it is unique and call it "Dry Needling when it is really acupuncture.	4/22/2015 9:25 PM
12	Dry needling is acupuncture without the knowledge.	4/22/2015 6:31 PM
13	Can the taking out of needles be delegated?	4/10/2015 5:59 PM
14	Don't know what r4-24-304 is off hand	4/2/2015 10:09 PM

Q14 Please provide any comments regarding Section D.

Answered: 143 Skipped: 673

#	Responses	Date
1	Dry needling is acupuncture and should not be done.	5/2/2015 11:47 PM
2	I don't think the general public will understand the difference between acupuncture and dry needling	5/2/2015 11:04 PM
3	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:20 PM
4	The Education requirements are inadequate and should be a Masters of Acupuncture Studies i. Order to perform the needling that is being documented	5/2/2015 8:09 PM
5	Only MD's and Acupuncturists with required thousands of hours training should be the only ones using needles within the skin. You are putting the publics safety at risk.	5/2/2015 5:27 PM
6	This language protects the PT more than the consumer.	5/2/2015 5:21 PM
7	Only acupuncturists should be using needles	5/2/2015 5:10 PM
8	If there are License for Acupuncturists in the State of Arizona, how can a PT do "Dry Needling" which is putting ACUPUNCTURE NEEDLES into a person's body? Let the PTs go to Acupuncture School.	5/2/2015 3:49 PM
9	Based on my previous comments, I believe this section is irrelevant.	5/2/2015 3:14 PM
10	It is dangerous to allow acupuncture, under the false name of "dry needling", to be used to treat physical symptoms that acupuncture has historically been used to treat by experienced, licensed acupuncturists.	5/2/2015 3:04 PM
11	A licensed acupuncturist should be the only one allowed to provide this service	5/2/2015 2:42 PM
12	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:07 PM
13	Your standard of care needs to be decided upon by the California State Board of Acupuncture. This is seriously a joke	5/2/2015 10:20 AM
14	The standard of care should require at a minimum professional master's degree or professional master's level certificate or diploma in acupuncture or a professional master's degree or a professional master's level certificate and diploma in Oriental medicine.	5/2/2015 10:18 AM
15	I am satisfied that it shall not be delegated. I am satisfied that there must be consent and documentation, but I'm not familiar with the stated regulations.	5/2/2015 9:08 AM
16	Please refer to the Board of Acupuncture for some guidance on this subject.	5/2/2015 8:50 AM
17	See other notes	5/2/2015 8:48 AM
18	4. And only performed by licensed acupuncturists.	5/2/2015 7:57 AM
19	A.A.C. R4-24-301 & A.A.C. R4-24-304 are weak. Because "dry needling" is acupuncture, the NCCAOM should be the regulating body.	5/2/2015 7:50 AM
20	See previous comments	5/2/2015 7:46 AM
21	Why on earth would you allow someone with very little training to do this?	5/2/2015 7:44 AM
22	This is not enough training!	5/2/2015 7:43 AM
23	Only licensed acupuncturist	5/2/2015 7:19 AM

24	Dry needling should be performed by a board certified AP	5/2/2015 7:16 AM
25	PT should not be doing this period.	5/2/2015 7:12 AM
26	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's	5/2/2015 12:46 AM
27	You might as well let the assistive personal do the treatment since the requirements are so minimal.	5/1/2015 11:16 PM
28	Dry needling should not be performed by a PT, much less an assistant. The only people that should perform dry needling are acupuncturists, because dry needling is acupuncture.	5/1/2015 10:55 PM
29	PT's should not be performing acupuncture with out a license to practice acupuncture. "Dry Needling" is a technique in acupuncture. Calling it another name doesn't negate the fact that it is acupuncture.	5/1/2015 10:49 PM
30	24 hours of training is so low compare to 1000s of hours that acupuncturist received. Without proper training, this will post a threat to the public!	5/1/2015 10:24 PM
31	Once again, not good enough!	5/1/2015 10:23 PM
32	This is not at all satisfactory.	5/1/2015 10:08 PM
33	The consent form should clearly state and also be explained by the physical therapist that they are not an acupuncturist and are not fully trained as such. Physical Therapists should be required to explain to their patients that acupuncture is one part of the ancient practice of Chinese Medicine and that if they do not experience favorable results from this "dry needling", they should seek out a licensed acupuncturist who is fully trained in the medicine.	5/1/2015 9:36 PM
34	How can it be called a standard of care by someone who is not qualified to be providing the service.	5/1/2015 9:33 PM
35	PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:31 PM
36	INSUFFICIENT	5/1/2015 9:20 PM
37	What is being called Dry needling is actually Acupuncture and should only be practiced by those Licensed to do so in the State of Arizona.	5/1/2015 9:16 PM
38	Patients must be made aware that they are undergoing a procedure in which the PT has only received 24 hours of training.	5/1/2015 9:09 PM
39	Acupuncture should only be performed by a licensed acupuncturist.	5/1/2015 8:24 PM
40	needling should only be done by a licensed acupuncturist	5/1/2015 7:41 PM
41	N/A	5/1/2015 7:38 PM
42	Wow, impressive, they have to do their own work and document properly. Of course this should be an expectation.	5/1/2015 7:30 PM
43	You are unqualified and under-trained. Stop pretending to be acupuncturists.	5/1/2015 7:15 PM
44	This is not enough training. It is a public safety risk.	5/1/2015 7:07 PM
45	24 hours is not nearly a sufficient amount of training. These people will be inserting a medical device into patients. It is irresponsible and reckless to have so little training. the safety of patients is at stake- there have been numerous injuries such as pneumothorax by insufficiently trained PTs. I beg you to reconsider.	5/1/2015 6:46 PM
46	Dry Needling should not be within the scope of Physical Therapists.	5/1/2015 6:34 PM
47	This is not an intervention but an Invasive Procedure that includes insertion of sterile needles into a patient's body. This is acknowledged because there is a requirement for seperate consent.	5/1/2015 6:33 PM
48	Patients trust their providers and providers their primary doctors refer them to. Informed consent does not truly Inform the public. If you allow PTs to practice dry needling and offer this technique with such little training, they will assume it is safe.	5/1/2015 6:25 PM
49	Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason.	5/1/2015 6:20 PM
50	Still not ok!	5/1/2015 6:19 PM

51	Should not be described as acupuncture and should be limited to musculoskeletal management	5/1/2015 6:06 PM
52	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:57 PM
53	Since a PT is never trained to insert needles into the human body during school, what is the difference if an assistant performs the technique. This training is not enough regardless of basic anatomy knowledge	5/1/2015 5:53 PM
54	To be quite clear, the act of inserting an acupuncture needle into the body, under any pretense, or for any purpose whatsoever, is the practice of acupuncture. "Dry needling" is far outside both physical therapists' scope of practice and their scope of education and training. In most states, to become a licensed acupuncturist, an applicant must complete a minimum of 1,905 hours of education and supervised clinical training (1,245 hours of education and 660 hours of supervised clinical training). Yet you are wanting physical therapists who are not licensed by law to practice acupuncture are inserting acupuncture needles (up to four inches or more in length) into unsuspecting patients with 24 hours of training!!!??? "Dry needling" was first described over 2,000 years ago in China's earliest and most comprehensive extant medical treatise, the Yellow Emperor's Inner Classic (Huangdi neijing), where it discusses in detail using tender or painful points, also known as "trigger points" or "motor points," to treat pain and dysfunction, particularly of the neuromusculoskeletal system. Simply described, "dry needling" involves inserting an acupuncture needle into a tender or painful point and then appropriately manipulating (rotating and/or pistoning) it for therapeutic purposes. The Food and Drug Administration (FDA) classified acupuncture needles as Class II medical devices subject to strict regulations under the federal Food, Drug, and Cosmetic Act (FDCA) and FDA's regulations. Individuals purchasing or receiving acupuncture needles who are not licensed by law to practice acupuncture are directly violating both civil and criminal provisions of the FDCA intended to protect public safety. 21 U.S.C. § 331(a)-(c), (g). These include the FDA's requirements that acupuncture needles can only be sold to "qualified practitioners of acupuncture." 61 Fed. Reg. 64616 (December 6, 1996). FDA prescription labeling requirements themselves specifically prohibit the sale of acupuncture needles to anyone who is not a qualified practitioner of acupuncture. The required FDA prescription labeling on the package from which acupuncture needles are to be dispensed states: "Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the States." 21 CFR § 801.109(b)(1) (emphasis added). Any individual who is not licensed by law to practice acupuncture is directly violating the FDCA and FDA's civil and criminal prohibitions when they purchase or receive acupuncture needles for use in "dry needling."	5/1/2015 5:46 PM
55	Acupuncturist in CA receive over 1000 hrs of training for needle insertion. I do not believe this small amount of training is sufficient to prevent harm to patients as evidenced my many recent complaints involving pnemothorax with dry needling.	5/1/2015 5:33 PM
56	A full four year degree should be required of any practitioner.	5/1/2015 5:27 PM
57	Physcial Therapists should not be permitted to practice dry needling.	5/1/2015 4:55 PM
58	You can think what ever about dry needling but it is years of understanding and work of more than 24 hours to grasp precautions and directions of what happens when needling.	5/1/2015 4:48 PM
59	If dry needling is allowed, I think the consent form should inform the patient of the difference in training between a PT and a licensed acupuncturist. Do not flower it up!	5/1/2015 4:48 PM
60	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:26 PM
61	Do you mean providing SOAP notes for their acupuncture performed... ? Well I'm thinking they can't do that because they don't have the knowledge of the points!!!!	5/1/2015 4:23 PM
62	Again leave it to the professionals	5/1/2015 1:48 PM
63	Dry needling is acupuncture! Acupuncture needles are used it is unlicensed acupuncture.	5/1/2015 1:14 PM
64	No	5/1/2015 12:46 PM
65	How about "dry needling" (acupuncture) should not be done by ANY personnel other than a licensed acupuncturist.	5/1/2015 11:16 AM
66	The people who are getting the treatment will need to know how many hours of training a person received to be able to do drying needling and also the dangers of being punctured in the wrong location and what to do about that if that should happen	5/1/2015 8:40 AM
67	Again, as stated previously...it is appalling that anyone be allowed to administer "needling" with such a minimal amount of education. Leave it to Acupuncturists who have gone through the extensive education that makes them the experts rather than these novices who can cause more harm than good	5/1/2015 2:14 AM

68	Dry needling is acupuncture without proper training or licensure. The standard of care is in great jeopardy.	4/30/2015 10:16 PM
69	The PTs are assistive personnel in my opinion. They are not trained in Acupuncture aka dry needling. Acupuncture needles, of which they use, are a surgical device that they are not legally allowed to order. They must be ordered by an MD or a licensed acupuncturist. An assistive person has just as little training in this matter as a PT.	4/30/2015 9:55 PM
70	#1 is a good requirement, but is "dry needling" fully explained as actual penetration of the body with a needle by a person with only 24 hours of training?	4/30/2015 8:26 PM
71	Your standard of care is not good enough because the amount of training is not adequate.	4/30/2015 7:49 PM
72	See my response to section A	4/30/2015 7:10 PM
73	Deceptive to the public	4/30/2015 6:19 PM
74	Clearly the national medical community, with the exception of a subset of the physical therapist community, thinks that needling with only 24 hours of training is a mistake, a danger to the public, and an overreach by the physical therapy profession. In light of the acknowledged risks and mandated training for others who perform acupuncture, it would be wise to ensure that there is sufficient training for physical therapists...and a substantial amount of supervised clinical practice. In the end, it would be healthier for all concerned to simply require the same minimum number hours of no less than 1200 hours of training (the national and international standard), including supervised clinical practice (500-800 hours). This is the standard that the medical community has established and respects. To engender respect for the physical therapy profession, including from its patients, aiming for more education, not less, is advised.	4/30/2015 2:10 PM
75	THANK GOD YOU WON'T BE LETTING ASSISTANTS DO IT WITH OUT TRAINING! BUT YOU STILL NEED MORE THEN 24 HOURS!	4/30/2015 1:52 PM
76	Writing a new law for the physical therapists to perform acupuncture under the name of dry needling is a great marketing tool as well as additional income for an add on therapy sold to unknowing and desperate for relief patients in pain. Will the Physical Therapy businesses disclose how fully trained their "dry Needling" therapists are? More professions even outside the scope of medicine require more training that that.	4/30/2015 11:44 AM
77	patients do not get adequate information on choices and consequences as well financial ramifications	4/30/2015 9:34 AM
78	Again, there is no need for separate regulation for "dry needling;" simply become an acupuncturist and be regulated by laws already in place. Dry needling is acupuncture.	4/30/2015 2:11 AM
79	How do you even know what your needling? How will you document anything?	4/30/2015 12:24 AM
80	This amounts to no disclosure at all. Patients will not know that a PT has only taken 24 hours education in the technique. Coupled with the refusal of the PT Board to limit the technique to practitioners who have actual practice experience, the PT Board has severely limited the public's right to know what the education of the PT is before undertaking treatment.	4/29/2015 9:39 AM
81	Dry needling, especially when practiced after only 24 hours of training and no supervised clinical training, should be limited to the ear or limbs but most certainly not the torso. There should also be a directive to refer to an MD or Licensed Acupuncturist, as well as an informed consent form for the patient acknowledging that dry needling is a form of acupuncture, disclosing that the PT has only had 24 hours of training, and that the patient may wish to seek acupuncture from a fully trained professional acupuncturist or MD.	4/28/2015 10:09 PM
82	If dry needling/acupuncture is so easy that it can be taught in 24 hours, why not let anyone do it, including assistive personnel?	4/27/2015 6:37 PM
83	Dry Needling is Acupuncture...	4/24/2015 8:39 PM
84	Patients should be informed of how much training the Physical Therapist has had and how long they have been doing acupuncture (dry needling).	4/24/2015 6:43 PM
85	Dry needling in itself is out of the scope of practice of the profession	4/24/2015 6:06 PM
86	Should be restricted more to what they are able to do with such little training. Public safety	4/24/2015 4:54 PM
87	One has to know the exact location of the hundreds of points on the body, what they do, the depth of the point, the angle of insertion, the combination of points, etc. otherwise harm could be done.	4/24/2015 4:24 PM
88	Consumers don't understand the highly increased risks of being needled by someone with so little training.	4/24/2015 2:49 PM

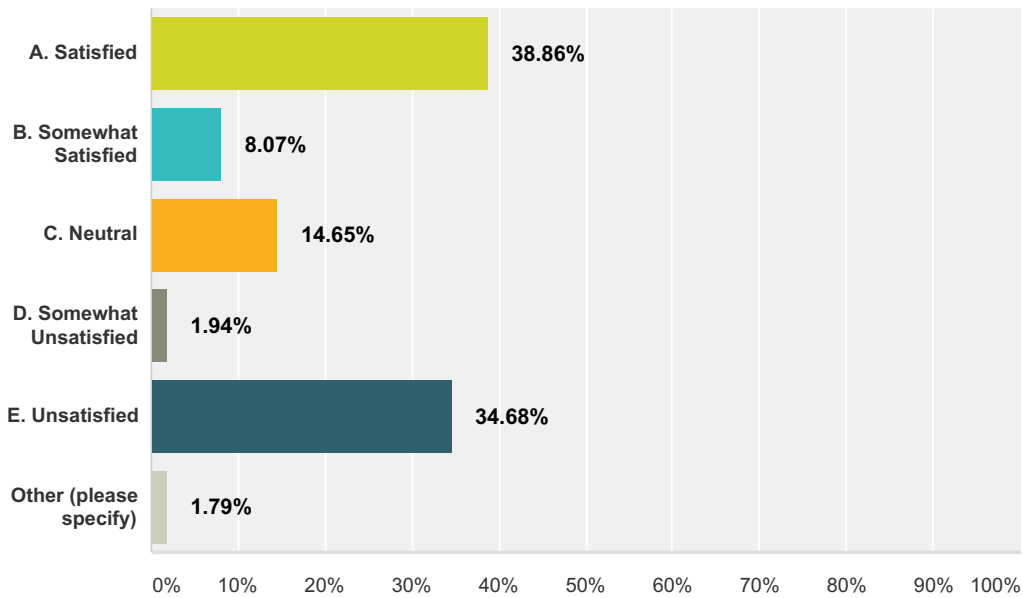
89	Dry needling is done with a hypodermic needles, they are using acupuncture needles. Get the terminology correct.	4/24/2015 2:32 PM
90	dry needling simply should not be a technique used by pts .	4/24/2015 1:52 PM
91	Physiotherapists are not trained well enough and they don't deserve to take food away from my children. I have 11 kids	4/24/2015 12:26 PM
92	see prior comments	4/24/2015 10:46 AM
93	The fact that "dry needling" cannot be passed on to untrained persons is moot seeing as the "official dry needlers" have only a few hours more training than those who are untrained.	4/24/2015 12:45 AM
94	Acupuncture can't be delegated to untrained physical therapists!	4/24/2015 12:07 AM
95	Documentation for dry-needling should only be performed by someone fully trained in dry-needling and the training listed is insufficient.	4/23/2015 10:34 PM
96	Who give physical therapist the right to make up there own name for acupuncture to suit their purpose of making a buck and then make standards so low that is is shameful.	4/23/2015 9:09 PM
97	24 hours of training show a lack of respect for acupuncture. Why would one that does not respect the medicine even think twice about handing it off to their assistant?	4/23/2015 5:42 PM
98	Consent and documentation are of course mandatory Assistant personnel should not be doing needling UNLESS they are trained and licensed in acupuncture	4/23/2015 3:04 PM
99	There is no provision for Chinese medical theory and its application....a degree in Chinese medicine and acupuncture is a must to practice any type of acupuncture and needling...	4/23/2015 12:07 PM
100	Dry needling aka acupuncture should only be done by PTs who have met the didactic & clinical requirements of acupuncturists & have passed the NCCAOM	4/23/2015 8:34 AM
101	Dry needling is a misnomer. It's really practicing acupuncture without a license and should be treated as such.	4/23/2015 7:51 AM
102	PTs should not perform Dry Needling (unless you allow massage therapist to perform physical therapy?)!!!	4/23/2015 6:43 AM
103	The amount of training required is not enough for public safety.	4/23/2015 5:51 AM
104	refer patient to Licensed Acupuncturist	4/22/2015 9:55 PM
105	Give a monkey a grenade and they will pull the pin.	4/22/2015 9:25 PM
106	The standard of care is not safe.	4/22/2015 9:18 PM
107	Included should be that the removal of the needles not be delegated to an assistant. Also, since many insurance companies do not pay for "Acupuncture" no matter what it is called, the current PT practice of passing Dry Needling off as a "Physical Modality" or some such thing, to get around this insurance limitation amounts to insurance fraud. Therefore the indication of 'Dry Needling' in the progress notes and coding must be very specific and clear. I do not even know if there is an insurance code for Dry Needling, different from Acupuncture. Having PTs consistently commit insurance fraud has a very unsavory air about it. It should be regulated out of practice.	4/22/2015 7:21 PM
108	This should only be done with a proper license in acupuncture after years of training and understanding.	4/22/2015 6:31 PM
109	Feels like this is a way to make something safe that is already dangerously unsafe	4/22/2015 6:29 PM
110	Public health hazard, PT can harm the general public by puncturing the Lu and internal organs	4/22/2015 5:23 PM
111	The education requirements are not nearly enough. Why do the dry needling? What is the expected outcome? What is the physiology behind it? etc...	4/22/2015 4:49 PM
112	Standards of consent should be re-enforced here: consent in writing? Prior to EACH consecutive session or only at the initiating of dry needling on session one?	4/21/2015 10:50 PM
113	again, another standard formality... that doesn't prove a person's qualification to perform "acupuncture (/aka dry needling, etc.).	4/13/2015 8:06 PM
114	How can this be billed when the codes for needling of this type are designed for billing by licensed acupuncturists?	4/11/2015 2:35 PM

115	Individual PTs wishing to participate in this without receiving meaningful training commensurate with that required for those licensed to practice acupuncture should be required to disclose their training level of preparation and let the healthcare consumer decide if they would prefer instead to seek a well-qualified acupuncturist to use the very same needles for relief of pain or whatever else the PT purports to do with this "shiny toy modality." Consent that is not informed is not true consent.	4/10/2015 3:59 PM
116	Again professional license in acupuncture	4/10/2015 2:16 PM
117	We need somewhat more direction on the expectations of documentation. For example, we do not use meridians and are not allowed to use that for our documentation process, thus, would "knee OA protocol" be considered appropriate documentation? That's the only hard part. Include the number of needles used?	4/7/2015 11:12 PM
118	No specific comments	4/6/2015 10:08 PM
119	It is very important to me that the treatment not be allowed to be performed by a PT assistant	4/6/2015 9:58 PM
120	Having the R4 requirements delineated would have been helpful	4/6/2015 9:37 PM
121	I would like my staff (who are trained in blood born pathogens) to be able to take needles out of pt.s. Does this section disallow this?	4/6/2015 11:12 AM
122	I am not an expert on the topic however unless dry needling requires Evaluative skills for each session I would prefer to see a path for PTA to acquire the same skills/competency. If this is generally considered an evaluative technique more than treatment modality than disregard.	4/6/2015 9:36 AM
123	If a PT chooses to delegate this, then as the professional, the PT should be able to delegate whatever he/she wants to. This should be left the individual PT to make the professional decision on what to delegate. Obviously, the PT should have to document the intervention consistent with current statutory and rule language.	4/5/2015 10:28 AM
124	Same	4/5/2015 9:41 AM
125	After reviewing R4-24-301 and R4-24-304 the drafted rules appear satisfactory as these issues should be no different than current physical therapy practice standards.	4/5/2015 8:59 AM
126	Only licensed physical therapists should be doing this. The area of question may be military bases where technicians do a lot of the treatment.	4/4/2015 8:05 PM
127	In the cases of businesses who employ acupuncture certified personnel, I believe it should be allowed to be delegated to assistive personnel. This is not different than using massage therapists for soft tissue mobilization or the like.	4/3/2015 10:44 PM
128	Same	4/3/2015 12:08 PM
129	I strongly agree.	4/3/2015 8:50 AM
130	Not clear what is included in A.A.C R4-24-301 or 304 and not willing to take the time to look it up	4/3/2015 8:18 AM
131	Fully agree	4/3/2015 7:38 AM
132	Dry needling should not be appropriate for the use of a PTA.	4/2/2015 10:59 PM
133	item 2 is unclear and should state what is meant by R4-24-304	4/2/2015 10:22 PM
134	you should clearly define assistive personnel to avoid any confusion between PTA, ATC, Massage Therapist , therapy tech etc. Arizona is notoriously lax in regards to scope of practice!	4/2/2015 10:04 PM
135	yes dry needling should be only by a PT	4/2/2015 9:57 PM
136	Compliance great.	4/2/2015 9:46 PM
137	Item 2 and 3 are redundant and do not need to be repeated as additional rules	4/2/2015 8:29 PM
138	This is already how being practiced. It is skill above assistive personnel skill level.	4/2/2015 7:56 PM
139	No comment	4/2/2015 7:30 PM
140	no comment	4/2/2015 7:17 PM
141	Now days we are more concerned with documenting then pt. care.	4/2/2015 6:22 PM
142	This is all that is needed in the rules.	4/2/2015 5:59 PM

143	Ensure there is an objective standard to measure a trigger point or target of the needle. If this cannot be met no needle needed.	4/2/2015 5:57 PM
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Q15 Please describe your satisfaction with draft changes to A.A.C. R4-24-208. The following paragraph would be added to the current rule A.A.C. R4-24-208, which describes requirements for licensure renewal.R4-24-208. License or Certificate Renewal; Address ChangeAdd paragraph P. P. IF A LICENSEE, A STATEMENT OF WHETHER THE LICENSEE HAS COMPLETED THE DRY NEEDLING COURSE CONTENT REQUIREMENTS IN A.A.C. R4-24-xxx.

Answered: 669 Skipped: 147



Answer Choices	Responses
A. Satisfied	38.86% 260
B. Somewhat Satisfied	8.07% 54
C. Neutral	14.65% 98
D. Somewhat Unsatisfied	1.94% 13
E. Unsatisfied	34.68% 232
Other (please specify)	1.79% 12
Total	669

#	Other (please specify)	Date
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1	A bill has been passed but as a consumer I see no need for PTs to do dry needling.	5/2/2015 5:22 PM
2	It seems unlikely 24 hours of dry needling is adequate to cover the topic with any amount of expertise.	5/2/2015 2:46 PM
3	Really?	5/1/2015 9:36 PM
4	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:26 PM
5	PTs need to follow acupuncturists guidelines & hours of training	5/1/2015 3:50 PM
6	This makes no sense.	4/30/2015 8:27 PM
7	Horrified	4/24/2015 12:09 AM
8	inadequate requirements	4/23/2015 5:46 PM
9	This should not even get through the floor for scrutiny.	4/22/2015 9:29 PM
10	I don't understand this question	4/14/2015 6:54 PM
11	dry needling is acupuncture is biomedical acupuncture is acupuncture	4/13/2015 8:11 PM
12	I don't understand this one.	4/3/2015 4:31 PM

Q16 Please provide any comments regarding draft changes to A.A.C. R4-24- 208.

Answered: 138 Skipped: 678

#	Responses	Date
1	Out of the scope of practice.	5/2/2015 11:48 PM
2	They should not have a provision to do dry needling	5/2/2015 11:05 PM
3	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:20 PM
4	The entire law for dry needling should be not be passed due to the inadequate education requirements	5/2/2015 8:11 PM
5	Only MD's and Acupuncturists with required thousands of hours training should be the only ones using needles within the skin. You are putting the publics saftety at risk.	5/2/2015 5:27 PM
6	If there are License for Acupuncturists in the State of Arizona, how can a PT do "Dry Needling" which is putting ACUPUNCTURE NEEDLES into a person's body? Let the PTs go to Acupuncture School.	5/2/2015 3:49 PM
7	Why not enforce the same State boards as Acupuncturist?	5/2/2015 3:42 PM
8	See previous comments. Much more education needed and not appropriate for a PT's scope of practice. This is like allowing a general surgeon to take weekend classes to perform dentistry. Yes, they have medical knowledge and anatomical knowledge, but they have nowhere near the amount of specialty training a dentist has. Theoretically, this would be both unfair to patients (who aren't informed about their practitioners' education) and to dentists, who have worked thousands of hours in classroom and clinic to be licensed in what they do.	5/2/2015 3:17 PM
9	Do not include paragraph R4-24-208, and remove the entire draft ruling; it's lame. Individuals currently using "dry needling" are in violation of the law, should be penalized, and not be allowed to continue.	5/2/2015 3:08 PM
10	Again I feel that 24 hour course is not enough training for what amounts to acupuncture by a different name.	5/2/2015 2:17 PM
11	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:07 PM
12	A statement is not enough. Need to show proof.	5/2/2015 1:05 PM
13	They should have to have completed course requirements, but the requirements are nowhere near adequate.	5/2/2015 11:35 AM
14	I'm not entirely sure what you're saying here but I think what you're saying is that if PTs want to renew their (I can only assume PT license) they need to indicate whether or not they went to this poops class or not. Unclear and ridiculous and I hope that you do not make this a requirement as I may still like to go to a PT one day and won't go to one touting about how they do acupuncture without a real license!	5/2/2015 10:23 AM
15	The Licensee should be required a minimum professional master's degree or professional master's level certificate or diploma in acupuncture or a professional master's degree or a professional master's level certificate and diploma in Oriental medicine.	5/2/2015 10:20 AM
16	Just a statement is required?!!	5/2/2015 10:10 AM
17	Course requirements are inadequate to protect the public.	5/2/2015 8:51 AM
18	These qualifications are totally unacceptable	5/2/2015 8:49 AM
19	Colpeted a course and received their acupuncture license	5/2/2015 7:58 AM
20	The NCCAOM should be the Licensing body of any type of acupuncture, of which "dry needling" is a type.	5/2/2015 7:51 AM

21	See previous comments	5/2/2015 7:46 AM
22	This is not enough training!	5/2/2015 7:43 AM
23	Only listened acupuncturist	5/2/2015 7:19 AM
24	Same as before.	5/2/2015 7:13 AM
25	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's	5/2/2015 12:46 AM
26	It is acupuncture. Training for acupuncture is more extensive that a few hours of training.	5/2/2015 12:10 AM
27	PT's should not be performing acupuncture with out a license to practice acupuncture. "Dry Needling" is a technique in acupuncture. Calling it another name doesn't negate the fact that it is acupuncture.	5/1/2015 10:50 PM
28	What about education proof?	5/1/2015 10:25 PM
29	None of this makes any sense and is a danger to the public until you raise your standards.	5/1/2015 10:24 PM
30	There is no comparison. The people of your state will be deprived of real acupuncture and its benefits.	5/1/2015 10:10 PM
31	Acupuncture is a profession with thousands of hours of training. The training needs to be consistent. Being a physical therapist does to prepare anyone for a profession in acupuncture.	5/1/2015 9:38 PM
32	I don't understand this line.	5/1/2015 9:37 PM
33	This has to be a joke at this point. So an unqualified person is going to perform a procedure they shouldn't be doing and all they have to do is write a letter that says that they did a weekend seminar equating to years of training and hundreds of hours of supervised clinic time.	5/1/2015 9:36 PM
34	PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:31 PM
35	INSUFFICIENT	5/1/2015 9:20 PM
36	What is being called dry needling is actually the practice of Acupuncture. No one should be licensed to perform this without full training from an accredited acupuncture college and passing the national licensing exam set by NCCAOM.	5/1/2015 9:18 PM
37	You don't even require them to show their weekend workshop? They just have to say on their honor they took it? Ridiculous	5/1/2015 8:31 PM
38	Again, licensing someone who has a dangerously small amount of education can lead to nothing but harm.	5/1/2015 8:00 PM
39	They should not be performing this service.	5/1/2015 7:30 PM
40	You should not receive a license for this meager amount of training.	5/1/2015 7:16 PM
41	This is not enough training. It is a public safety risk.	5/1/2015 7:08 PM
42	24 hours is not nearly a sufficient amount of training. These people will be inserting a medical device into patients. It is irresponsible and reckless to have so little training. the safety of patients is at stake- there have been numerous injuries such as pneumothorax by insufficiently trained PTs. I beg you to reconsider.	5/1/2015 6:47 PM
43	Please see previous comments.	5/1/2015 6:35 PM
44	Dry needling. Already is a License. It's called an acupuncture License. Why is dry needling NOT acupuncture? Because the clinician is "thinking" something different? Unacceptable to pass this. Practicing medicine without a license.	5/1/2015 6:27 PM
45	No, a license for Dry Needling should not be allowed at all. Dry Needling=Acupuncture which you need a Masters of Acupuncture & East Asian Medicine.	5/1/2015 6:21 PM
46	Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason.	5/1/2015 6:20 PM
47	As previously stated It is a sin that PT's are able to practice on real people withou the same amount of training required by a Lic. Acupuncturist. I do not comprehend your thinking about this issue	5/1/2015 6:01 PM
48	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:58 PM

49	To be quite clear, the act of inserting an acupuncture needle into the body, under any pretense, or for any purpose whatsoever, is the practice of acupuncture. "Dry needling" is far outside both physical therapists' scope of practice and their scope of education and training. In most states, to become a licensed acupuncturist, an applicant must complete a minimum of 1,905 hours of education and supervised clinical training (1,245 hours of education and 660 hours of supervised clinical training). Yet you are wanting physical therapists who are not licensed by law to practice acupuncture are inserting acupuncture needles (up to four inches or more in length) into unsuspecting patients with 24 hours of training!!!! "Dry needling" was first described over 2,000 years ago in China's earliest and most comprehensive extant medical treatise, the Yellow Emperor's Inner Classic (Huangdi neijing), where it discusses in detail using tender or painful points, also known as "trigger points" or "motor points," to treat pain and dysfunction, particularly of the neuromusculoskeletal system. Simply described, "dry needling" involves inserting an acupuncture needle into a tender or painful point and then appropriately manipulating (rotating and/or pistoning) it for therapeutic purposes. The Food and Drug Administration (FDA) classified acupuncture needles as Class II medical devices subject to strict regulations under the federal Food, Drug, and Cosmetic Act (FDCA) and FDA's regulations. Individuals purchasing or receiving acupuncture needles who are not licensed by law to practice acupuncture are directly violating both civil and criminal provisions of the FDCA intended to protect public safety. 21 U.S.C. § 331(a)-(c), (g). These include the FDA's requirements that acupuncture needles can only be sold to "qualified practitioners of acupuncture." 61 Fed. Reg. 64616 (December 6, 1996). FDA prescription labeling requirements themselves specifically prohibit the sale of acupuncture needles to anyone who is not a qualified practitioner of acupuncture. The required FDA prescription labeling on the package from which acupuncture needles are to be dispensed states: "Caution: Federal law restricts this device to sale by or on the order of qualified practitioners of acupuncture as determined by the States." 21 CFR § 801.109(b)(1) (emphasis added). Any individual who is not licensed by law to practice acupuncture is directly violating the FDCA and FDA's civil and criminal prohibitions when they purchase or receive acupuncture needles for use in "dry needling."	5/1/2015 5:46 PM
50	The course content requirements are inadequate for the safe performance of dry needling.	5/1/2015 5:43 PM
51	Require additional training	5/1/2015 5:43 PM
52	It is appalling to think a statement and not a state recognized license would be requires for a healthcare professional to insert needles in the body.	5/1/2015 5:34 PM
53	A full four year degree should be required of any practitioner.	5/1/2015 5:27 PM
54	Training g is inadequate to protect the public	5/1/2015 5:05 PM
55	Hate that this is even a possibility what a disgrace to the acupuncture profession and the states requirements of licensing for acupuncturist who went to school for 4 years of training to get nationally recognized and then state licensed	5/1/2015 4:50 PM
56	PTs should not be allowed to insert needles into anyone!!!!	5/1/2015 4:49 PM
57	Physical Therapist training is not the same as that of an Accupuncturist	5/1/2015 4:26 PM
58	Are you joking again??? Seriously, I have a Masters degree in Acupuncture and Oriental Medicine... 24 hours of education is just stupid. PUBLIC SAFETY	5/1/2015 4:24 PM
59	In my opinion 24 hours or 24 weeks is not enough to qualify someone to do acupuncture	5/1/2015 12:47 PM
60	Please stop the "dry needling" insanity. It is doing acupuncture without correct licensure.	4/30/2015 10:17 PM
61	A PT is not adequately trained to perform the invasive procedure of dry needling or Acupuncture or Biomedical acupuncture unless they have attended an Oriental Medical school which requires several thousand hours of training specific to this practice.	4/30/2015 9:57 PM
62	Put the hours up to 300 and then you're starting to get somewhere.	4/30/2015 8:32 PM
63	Please do not allow this to pass. It is dangerous and not enough training is required.	4/30/2015 7:50 PM
64	See my response to section A	4/30/2015 7:11 PM
65	Needs to provide certificate proof.	4/30/2015 6:20 PM
66	These changes are simply still inadequate.	4/30/2015 2:12 PM
67	physical therapists do not have the training or knowledge and therefore should not be licensed to needle	4/30/2015 1:49 PM

68	My nest question to these law makers is....When will massage therapists get to do dry needling????? Just reading the ARS laws already in force about putting needles into patients, whether you call them fine filament or acupuncture needles) already has the requirements for licensure. Ignoring this fact is undeniably shocking! Re-writing the definition and terms is not fooling anyone. 24 hrs of an online class- would make most people wonder how anyone could possibly know what they are doing. Even MD's require more time to train than this to do their "medical" acupuncture. Does anyone read the Arizona laws that are in place for doing these medical procedures before voting on creating a new law to add sales to the physical therapy profession at the expense of patient's health and wellbeing?	4/30/2015 11:44 AM
69	Again who with proper training and credentials is vetting the training?	4/30/2015 9:37 AM
70	A declaration of training is insufficient. The Licensee should provide evidence of such training.	4/28/2015 10:09 PM
71	Educational requirements are inadequate.	4/28/2015 4:17 PM
72	DO NOT let people with only 24 hours or 242 hours... practice it is acupuncture and these people are not trained is acupuncture DRY needling is Acupuncture read the acupuncture qualifications.	4/24/2015 8:43 PM
73	not enough to keep the public safe from poor training	4/24/2015 4:54 PM
74	Dry needling may or may not help, and its efficacy should be studied more in depth.	4/24/2015 4:25 PM
75	Again, acupuncture without the years of training necessary to do well and not injure the public	4/24/2015 3:53 PM
76	There should not be any allowance for licensure of Physical Therapists to do dry needling. It is not safe.	4/24/2015 2:50 PM
77	Physiotherapists are not trained well enough and they don't deserve to take food away from my children. I have 11 kids	4/24/2015 12:26 PM
78	Again...knowing that they have completed only minimal training is probably mire disturbing than not knowing...	4/24/2015 12:47 AM
79	Please don't pass this! No matter how one slices this issue, it's still physical therapists attempting to practice acupuncture without an acupuncture license.	4/24/2015 12:09 AM
80	I disagree with the draft and the level of training and expertise required to perform dry-needling on the public. This is a dangerous set of potential rules and is allowing practitioners who are not properly trained to put public safety at risk. I thoroughly disagree with the draft and also with the ability of Physical Therapists to needle patients (under any name) without the full and proper training. Dry-needling is Acupuncture, therefore you need an Acupuncture license.	4/23/2015 10:38 PM
81	They need to get a license in acupuncture like the rest of us. Other states are stopping this dry needling stuff because patients are being hurt from Physical therapist and it is not dry needling it is acupuncture. A court ruling decided there was no difference	4/23/2015 9:11 PM
82	Need full and complete training in Chinese medicine and acupuncture.	4/23/2015 8:37 PM
83	Many states have recognized that dry needling is acupuncture and only to be practiced by an LAc.	4/23/2015 5:46 PM
84	There is no provision for Chinese medical theory and its application....a degree in Chinese medicine and acupuncture is a must to practice any type of acupuncture and needling...	4/23/2015 12:07 PM
85	Dry needling is acupuncture & should be regulated as acupuncture.	4/23/2015 8:35 AM
86	Unnecessary	4/23/2015 8:03 AM
87	See above comments	4/23/2015 7:52 AM
88	PTs should not perform Dry Needling (unless you allow massage therapist to perform physical therapy?)!!!	4/23/2015 6:43 AM
89	How long is this course? How many hours? Unless it is literally thousands of hours it is just NOT ENOUGH.	4/23/2015 5:52 AM
90	There is no requirement for continuing education.	4/22/2015 10:19 PM
91	provide proof of completion, maintain records for State audit.	4/22/2015 9:56 PM
92	DRY NEEDLING IS ANOTHER NAME FOR THE MISUSES OF ACUPUNCTURE WITH OUT THE PROPER TRAINING	4/22/2015 9:29 PM
93	A PT Licensee should fulfill the same course content that a PT student learning this modality is given in their university courses. Taking week-end workshops and no clinicals for this deep a treatment is unrealistic for them getting the level of education that they need to know what they are doing and to protect the public.	4/22/2015 7:24 PM

94	See above	4/22/2015 6:29 PM
95	PT should have a formal education go to school for 4 years and be a trained , professional acupuncturist , so they can needle their patient safety	4/22/2015 5:26 PM
96	Leave acupuncture to the acupuncturists and PT to the PTs. Work collaboratively, not competitively.	4/22/2015 4:50 PM
97	poor wording	4/14/2015 9:03 PM
98	I referred to this earlier pertaining to whether the hours for this specialty will count toward the CEUs needed for the AZ license renewal	4/14/2015 9:18 AM
99	these standards regardless of the pretend labels, simply do not change that fact that as powerful as the propaganda is, dry needling and acupuncture are one and the same. and 24 hours of so called training is proof that it's all about business / \$\$ profit.	4/13/2015 8:11 PM
100	24 contact hours of education is a woefully inadequate number of hours to practice the art of Dry Needling! To learn the energetics underlying the trigger point being needled takes many many hours of study and practice. Shame on you! Physical therapists are not qualified to judge training requirements for dry needling!	4/10/2015 2:52 PM
101	Number of coursework hours does not even begin to qualify anyone on the most basic of levels---that's akin to one semester at an accredited acupuncture school	4/10/2015 2:18 PM
102	Rather than a simple statement, the licensee should also provide proof of coursework completion and evidence of passing the course by taking a standardized test, requiring a demonstration of competency, again with established standards, not just random continuing education providers who devise their own curriculum and testing.	4/8/2015 12:46 PM
103	No specific comments	4/6/2015 10:09 PM
104	Why?	4/6/2015 9:42 PM
105	Not exactly sure what this is asking	4/6/2015 4:08 PM
106	Difficult to read as currently written- may be as remainder paragraph not shown	4/6/2015 2:05 PM
107	I think this will impact a small percentage of the population so would prefer only an affirmative statement be required with a default presumed negative in the absence of an affirmative response.	4/6/2015 9:37 AM
108	There is still some confusion on when to inform the board of a practitioner practicing dry needling if we have been practicing since before January 1, 2014.	4/5/2015 11:14 PM
109	No. Again, specific areas of PT practice should not be singled out and handled any differently than any other area of practice.	4/5/2015 10:29 AM
110	same	4/5/2015 9:41 AM
111	this doesn't make sense. Is this properly worded?	4/5/2015 7:58 AM
112	To prevent new graduates from substituting the entry level DPT for this qualification.	4/4/2015 8:06 PM
113	This is an excellent idea to keep the documentation all together on one cohesive certificate	4/4/2015 9:27 AM
114	As most of the previous courses did not include a written exam, these practicing therapists will not be allowed to practice?	4/4/2015 9:26 AM
115	Each time the license is renewed? Even if the course was completed 6 years ago?	4/3/2015 4:30 PM
116	Again, in no other technique is this required. Shouldn't be the case with dry needling just because other professions are trying to rob us of our RIGHTS!	4/3/2015 2:00 PM
117	Same	4/3/2015 12:09 PM
118	Not sure what this means exactly but if it involves making the PTs you represent and are supposed to be representing to improve rights and practice acts submitting information to the board then I disapprove.	4/3/2015 10:27 AM
119	Think only renewals which have completed the course content should be required to furnish a statement - the way paragraph P reads it seems like all renewals would need to furnish a statement about dry needling whether they have completed courses or not. Requiring all renewals to comment on dry needling coursework makes it appear that dry needling is a mandatory component of PT practice.	4/3/2015 10:26 AM

120	Licensee needs to provide proof of completion, not just a statement of completion. Also, what is the requirement for continued competence in this area?	4/3/2015 9:29 AM
121	no comment	4/3/2015 8:51 AM
122	not clearly understandable what you are wanting in this statement	4/3/2015 8:19 AM
123	The statement should be accompanied by copies of verification of completion of training.	4/3/2015 8:17 AM
124	I would consider honoring the grand father clause that will allow physical therapists performing this intervention to continue performing this regardless of the new requirements.	4/3/2015 6:10 AM
125	I would also add a requirement for a minimum amount of hours/sessions of both supervised and independent dry needling to be completed in order to fulfill licensure renewal (this would be a special clause for only those who want to/have completed dry needling coursework).	4/2/2015 10:20 PM
126	This seems odd. The licensing board does not ask for any other specific training, or specific adherence to the rules of the practice. Wouldn't this content be included in the GMC questions? Will PTs who do dry needling have to maintain a clinical competency?	4/2/2015 10:15 PM
127	define or clarify 'statement' in terms of proof of completion	4/2/2015 10:06 PM
128	good.	4/2/2015 9:46 PM
129	While this statement serves a purpose with respect to the legislative intent of the salute change, it is still unnecessary regulation for an area of advanced clinical practice .	4/2/2015 8:32 PM
130	Not sure what this wording means.	4/2/2015 7:58 PM
131	No comment	4/2/2015 7:31 PM
132	no comment	4/2/2015 7:17 PM
133	This should not affect whether or not we can renew our license. We don't have to report training for HVLAT or any other specialty.	4/2/2015 7:13 PM
134	Language is unclear out of context. Perhaps it should read: "If a licensee has completed dry needling coursework, the licensee must submit a statement of whether the licensee has completed the dry needling course content requirements in A.A.C. R4-24-xxx." I assume this statement is communicating that a licensee must submit a statement indicating that s/he has completed required dry needling course content. It is unclear whether the licensee must submit this statement at each renewal, or just the term following completion of the course. This should be made clear. Further, it would seem redundant if the licensee were required to submit this same statement in more than one license renewal period.	4/2/2015 6:21 PM
135	Paragraph P is not necessary.	4/2/2015 6:00 PM
136	I do not feel that it should be requirement to inform the board whether one has completed a dry needling course.	4/2/2015 5:57 PM
137	Not necessary for the same reason cited above.	4/2/2015 5:46 PM
138	I feel this technique should fall under the scope of our practice. We are DPTs.	4/2/2015 5:36 PM

Q17 Please provide any further comments you may have regarding the draft rules.

Answered: 234 Skipped: 582

#	Responses	Date
1	No Physical Therapist should be permitted to perform dry needling without significantly more education and practice. Patients should be referred to a qualified acupuncturist for the procedure.	5/3/2015 12:37 AM
2	How many lawsuits and injured patients will it take before you see that this is out of your scope of practice and that 24 hrs is a ridiculously short amount of time to learn acupuncture. Call it what you want to call it but deep down you know it's acupuncture. The package of needles is not called dry needling needles, they are called acupuncture needles.	5/2/2015 11:51 PM
3	this article is exactly why physical therapists should not be able to do dry needling. they are not trained properly on acupuncture insertion or the modality. http://www.usatoday.com/story/sports/olympics/sochi/2013/12/13/torin-yater-wallace-dew-tour-ion-mountain-championship-halfpipe-qualifying/4019707/	5/2/2015 9:39 PM
4	Dry needling should only be performed by licensed acupuncturist.	5/2/2015 8:20 PM
5	This law should not be passed in the interest of protecting the Arizona Citizens from injury that will surely result from inadequate Didactic and clinical training required 24 hours in no way begins to equal the 3000 hours of training and four board exams required to become an acupuncturist. You are sadly mistaken and obviously influenced by the PT lobbyists and must not pass this law for the safety of your citizens.	5/2/2015 8:16 PM
6	Only MD's and Acupuncturists with required thousands of hours training should be the only ones using needles within the skin. You are putting the publics saftey at risk.	5/2/2015 5:27 PM
7	When consumers and their medical providers feel they've received no benefit from dry needling, the fault will fall on the modality when in fact the PT was inadequately prepared to obtain a positive outcome. If PTs are going to be allowed to do this, they AT LEAST need to have as much training as an MD.	5/2/2015 5:25 PM
8	I do not trust and will not participate in dry needling from a Physical Therapist. I have been receiving acupuncture from a professionally trained (Chinese school) for about 20 years and I believe this is a bad idea!!!	5/2/2015 5:16 PM
9	The Legislature and Previous Governor have failed to protect the Health, Safety and Public Welfare of the Consumers and Citizens of the State of Arizona by allowing "Dry Needling" in the 1st place. If a consumer gets harmed, will the Legislators and Governor be personally liable? They should be, if they do not protect us. It would make them think twice about listening to lobbyists instead of common sense and the wide-spread industry training requirements even for MD's, NDs, and Chiropractors.	5/2/2015 3:53 PM
10	I wonder if other states that have allowed dry needling have seen an increase in pneumothorax injuries?	5/2/2015 3:43 PM
11	Unacceptable uninformed disastrous	5/2/2015 3:39 PM
12	Education in dry needling needs to be significantly more than a 24 hour course.	5/2/2015 3:38 PM
13	Please reconsider allowing PTs to perform dry needling. I encourage you to examine the work Washington state and California have done to keep dry needling out of the hands of PTs and only within the scope of licensed acupuncturists and why this became law in these states. Thank you.	5/2/2015 3:22 PM
14	If you want to have Pt's utilize needles get proper training period.	5/2/2015 3:11 PM
15	This is a sad day for Arizonan's who visit PT's if this law is passed. It becomes more obvious to "let the buyer beware". This seems more like a way to degrade the practice of acupuncture in a "hit and miss" mode but a great money making scheme for the PT industry.	5/2/2015 2:48 PM
16	Dry Needling is Acupuncture and is not in your scope of practice for the safety of the patients. Let PT's to physical therapy and Acupuncturists do the needling!	5/2/2015 2:48 PM
17	training utterly inadequate	5/2/2015 2:28 PM

18	I believe that "Dry Needling" is a dangerous practice with minimal training and documented cases where individuals who received "Dry Needling" have had medical complications directly tied to "Dry Needling". If only a line of communication was created between Physical Therapist and Acupuncturists so that patients could and would receive proper care.	5/2/2015 2:22 PM
19	This is Acupuncture, no matter what you wish to name it. Medical Acupuncturist at the very least have documented 300 hours of Training. Traditional Chinese Medicine Acupuncturist have over 1500 hours of training in the use of the same needles that the PT's are using. In fact they are called Acupuncture Needles. Why do you think other Medical Professionals have such a high degree of training? Could it be that It is necessary for the safety of the public? One would think that the PT Board is not interested in Public Safety rather in using whatever means they choose simply because they can. Well good luck when your PT's start using acupuncture needles and injure their patients, and maybe that is what you want in the long run? Then patients would have to be treated longer and you then would be able to bill their insurance company for longer treatment plans.	5/2/2015 2:08 PM
20	Twenty-four hours is an insufficient level of training to ensure unsuspecting members of the public are not harmed. Local, national, and international organizations and healthcare communities agree: The World Health Organization (WHO), the national Accrediting Commission for Acupuncture (ACAOM), and current Arizona law have set a minimum standard for needling of at least 1,850 hours specifically in didactic and supervised clinical practice in acupuncture (not including bio-medicine education requirements) Arizona law does permit the practice of acupuncture with less training, for the purposes of treating addiction. However, these auricular detox specialists are limited to only 5 points in the ear and must receive 70 hours of training and be supervised by a licensed acupuncturist. Finally, the American Academy of Medical Acupuncture (AAMA) the organization that represents Medical Doctors that practice acupuncture recognizes dry needling as acupuncture and as an invasive procedure. Further, AAMA recommends M.D.'s to have an additional 300 hours of training on top of their four year medical degree and non-physicians (including Physical Therapists) to have 2,000 hours of education and training.	5/2/2015 1:05 PM
21	Dry needling is acupuncture. If this is not understood, then needles should never be used by your profession.	5/2/2015 12:43 PM
22	If you want real training go to a real school and get a real license. Don't make an ass out of your profession. Have some respect for the work that you do and that of what real acupuncturists do and for that matter the patients which you see. I can't imagine that there are actually people out there who are ok with you needling them with only 24 hours experience.	5/2/2015 10:26 AM
23	The standard of care should require at a minimum professional master's degree or professional master's level certificate or diploma in acupuncture or a professional master's degree or a professional master's level certificate and diploma in Oriental medicine.	5/2/2015 10:21 AM
24	There have many documented cases of untrained, unlicensed practitioners causing harm such as pneumothorax, pain and or nerve damage from improper depth and point location. This compromises a medicine that has been utilized for thousands of years.	5/2/2015 10:15 AM
25	Again, INCREASE the training! I am a licensed acupuncturist, and I don't begrudge PT's adding this powerful technique to help patients heal, BUT they NEED more training to do it safely and effectively. Please reconsider your requirements.	5/2/2015 9:10 AM
26	There is no reason why needling should be given to PT if PT is not given to acupuncturists who have had the same amount of anatomy and structure classes. This is an abomination.	5/2/2015 8:50 AM
27	Dry Needling is Acupuncture by another name. If the Physical Therapy Profession wishes to add this skill set it needs to have more then a couple of hours of training to safely insert a needle into a human without complication. At minimum you should be looking at 1000 hours of education including infection disease control, needle safety, organ depth, tissue response (all things covered in the western component of training in acupuncture). I understand the need for "not learning the eastern medical information" since the profession insists that dry needling is not acupuncture, but since acupuncturists have been doing dry needling for 2500 years (Ah shi needling found commonly in orthopedics) they should be held to the minimal standards that acupuncturists are held to. To dismiss that dry needling is not acupuncture by referring to acupuncture as energetic medicine is ignorant to science in general. What do they think is actually happening when the acupuncturist inserts a needle into a muscle?	5/2/2015 8:36 AM
28	Your allowing people to perform what is essentially acupuncture with so little training is both dangerous and a huge disservice to the public who is unaware of the vast difference in training between an acupuncturist and a PT "dry needling".	5/2/2015 8:01 AM
29	This is not enough training! It is beyond ridiculous that PT's are doing acupuncture - calling it a dry needling & not required proper training! If a PT would like to add this to their "tool kit" they should be required to receive a LAc with the same educational requirements!	5/2/2015 7:51 AM

30	24 contact hours and allowing PTs to perform a procedure that should be labeled as acupuncture. Is dangerous to the public and should be out of scope for PTs.	5/2/2015 7:49 AM
31	I am a Clergy person, and I would be aghast to hear of an unexperienced lay person providing the services that I provide: leadership, church governance, writing, preaching, and pastoral care. Responsibility for another's actual well being should be placed in the hands of only those who have been deeply trained in their field. Let PTs do PT! And let people who have gone to the equivalent of medical school in acupuncture do the acupuncture.	5/2/2015 7:46 AM
32	This should only be done by licensed acupuncturist	5/2/2015 7:20 AM
33	Reconsider this desire to practice another form of medicine other than your own. Work together as a collaborator with acupuncture physicians to provide the best care to patients as opposed to seeking another profit center for PT's.	5/2/2015 7:19 AM
34	This should not be in their scope of practice. Sorry. Inadequate training can do harm to the public as demonstrated in the past.	5/2/2015 7:14 AM
35	I smell lawsuits... This is very irresponsible.	5/2/2015 6:21 AM
36	This is a physical therapist performing acupuncture without the proper training! Very, very dismayed and disappointed that this is even being considered!	5/2/2015 3:34 AM
37	It is not ethically appropriate for health care professionals to engage in performance of procedures of invasive training with such limited training and expertise. Would you undergo a surgical procedure (even a minimal one) from a doctor, who had 24 hours of training and no supervision afterward?	5/2/2015 1:06 AM
38	For sake of public safety, dry needling should not be approved with such minimal educational requirements.	5/2/2015 12:50 AM
39	I think it's great that physical therapists want to learn acupuncture. However, I believe if they want to use it as a therapy, they should go to school for oriental medicine to learn proper diagnosis, reasoning, and technique. I believe this statement is true for any practitioner- MD, ND, DO, DC, etc. Oriental medicine is a specialty that requires years of studying to achieve proficiency in. Dry needling is like the half-assed version of it, except worse because it's a knock off. It's not even an original idea. Nothing in this world that is half-assed is considered respected. For example, no successful boss will ever happily accept half-assed work from an employee. A food order at a restaurant that isn't delivered properly will lead a consumer not to attend that restaurant anymore. A kid half raised by their parents through nannies won't respect or rely on their parents... Things that are not respected become devalued and looked down on. Ex: McDonald's is a mildly successful business but its consumers are known as the poor, unhealthy part of the general population. Anyone with self awareness and awareness of their environment knows that eating McDonald's is an unhealthy habit. It's an effective means of filling your stomach. However, it isn't satisfying nor is eating there respected among the educated population. In the same fashion, dry needling is somewhat effective, but it doesn't give a patient the same effect a fully body acupuncture treatment would. It doesn't have the right ingredients, the educated cooks, nor the proper ethics for making a patient happy and healthy.	5/2/2015 12:49 AM
40	Acupuncturist license should have to apply. PT 's should not be allowed to needle without equal amount of training. Dry needling should be illegal to PT's	5/2/2015 12:46 AM
41	You should be ashamed that you are going to let people invert medical devices with 24 hours of training.	5/2/2015 12:26 AM
42	I think it is an unsafe and unethical attempt to collect additional insurance premium and undermines those who are fully licensed health care providers with formal training of over 2,000 hours.	5/1/2015 11:24 PM
43	You guys should be prosecuted in jail when someone dies of a pneumothorax. The blood will be on your hands.	5/1/2015 11:01 PM
44	For the safety of the public and innocent patients, please do not allow PTs to perform acupuncture (what you call dry needling) with 24 contact hours of education on the topic. This is irresponsible to the extreme.	5/1/2015 10:58 PM
45	PT's should not be performing acupuncture with out a license to practice acupuncture. "Dry Needling" is a technique in acupuncture. Calling it another name doesn't negate the fact that it is acupuncture.	5/1/2015 10:50 PM
46	Thanks for reading this. Sorry but I don't agree on short term courses. I am currently under the care of a great PT, and there is no way I would EVER do dry needling in that office. Focus on what you already have.	5/1/2015 10:42 PM
47	This is a safety issue, not enough training.	5/1/2015 10:39 PM
48	Do not pass this!	5/1/2015 10:26 PM
49	I think I've made my concerns clear.	5/1/2015 10:25 PM

50	24 hours of training is so low compare to 1000s of hours that acupuncturist received. Without proper training, this will post a threat to the public!	5/1/2015 10:25 PM
51	Physical therapy is effective and has its own benefits. If physical therapists do dry needling and patients think they are getting acupuncture they are not receiving the same care they would be if they got acupuncture from an acupuncture physician who studied needling for 4 years. Keep the two modalities apart and do not dilute either.	5/1/2015 10:13 PM
52	Does not sound right. Let a professional LAC perform this. Thank you.	5/1/2015 10:13 PM
53	INCREASE TRAINING AND EDUCATIONAL REQUIREMENTS FOR THE SAFETY TO PROTECT PATIENTS	5/1/2015 9:55 PM
54	This is a poke in the eye to the extensive training required by acupuncturists and naturopaths to practice actual acupuncture. These unqualified physical therapist should stick to their scope of practice and not be allowed to use "dry needling" EVER!	5/1/2015 9:52 PM
55	I wholeheartedly respect the field of Physical Therapy, but I see no benefit in allowing untrained healthcare providers to perform "dry needling", a term not used anywhere in Chinese Medicine. While Chinese Medicine does sometimes utilize trigger point needling, this is a minuscule aspect of acupuncture; there are far better ways to treat pain and limited range of motion, not to mention an whole host of other ailments that someone not fully trained in the Medicine would be incapable of addressing. It is very important to protect patient safety as well as the integrity of the medicine, and allowing people, however well-intentioned, to insert needles into patients with such little training is bad for patients and bad for practitioners.	5/1/2015 9:42 PM
56	Physical therapy is a western modality. It does not provide the theoretic nor didactic basis to perform acupuncture. The reason you license acupuncturists is for the public's safety. Why are considering bypass that consumer protection?	5/1/2015 9:40 PM
57	The Board should seriously consider how this will affect their profession as I will spend a significant amount of time, money and energy bringing the incredible lack of professional safety standards of physical therapists to the public's attention in order to help protect us from this negligent activity.	5/1/2015 9:38 PM
58	Practitioners go to school for 3++ years to perform needling, we are called Licensed Acupuncture Physicians. We specialize in the art of needling. Not a course with minimal requirements and minimal time spent learning. PTs should NOT be dry needling at all! NO DRY NEEDLING!	5/1/2015 9:33 PM
59	Dry Needling is acupuncture by a different name. Keep it out of the profession of PT's unless the practitioner has actually gotten full training that is required for a Licenses Acupuncturist. I find it negligent and dangerous to allow laughably minimal training for something performed on the physical body of humans.	5/1/2015 9:23 PM
60	"dry needling" is dangerous to the public	5/1/2015 9:18 PM
61	The proposed level of education is completely insufficient to provide the PT with enough training to reduce and eliminate the risk of harm to the patient, especially pneumothorax. Similar techniques used by other healthcare professions require significantly more training and documentaion of training. For example, Acupuncturists are required to have over 1,000 hours of clinical training and pass a national board exam in order to practice in the state of Arizona. While still insufficient, Chiropractors are required 100 hours of training before being certified to practice Acupuncture. Most MD training programs are 300 hours of training. 24 hours is entirely insufficient to create an effective 'dry needling' therapist and protect the public from possibly damage and organ puncture that can occur when 'dry needling' is performed without proper training. Dry needling requires aggressive stimulation of trigger points to produce a twitch. Many common trigger points are located over the ribcage and close to the lung. Such muscle groups include but are not limited to the trapezius, scalenes, pectorals minor and major. Without proper training and precaution the risk of pneumothorax is great.	5/1/2015 9:15 PM
62	I don't know why you do this survey as you don't take into consideration any of the information provided to you by experts in the field of needle insertion.	5/1/2015 8:53 PM
63	Please do not consider so grossly infringing on the scope of the acupuncture profession.	5/1/2015 8:49 PM
64	Increase the educational requirement to the level of other non acupuncturists providing/using needling techniques. Your comparison groups should include M.D.'s, D.C.'s, and ND's at a minimum.	5/1/2015 8:41 PM
65	Please respect the profession of acupuncture.	5/1/2015 8:26 PM
66	You people with your 'dry needling" are silly. Stick to the modalities you know and do well already. This is scope creep into a medical procedure you do not know enough about.	5/1/2015 8:13 PM
67	Please do not allow this. Stick to what you have trained for and what you are good at. Leave the needling to those that have dedicated 4 years of there lives to the study of acupuncture.	5/1/2015 8:02 PM

68	Anyone who is considering allowing dry needling with the minimal amount of "training" should get dry needling performed by a therapist with the proposed training and compare with an acupuncture treatment performed by an acupuncturist with the 3-4 years of graduate training. The difference is amazing! (and sometimes, very dangerous)	5/1/2015 7:44 PM
69	If a Physical Therapist wishes to provide "dry needling" to clients, they should also be required to take ALL necessary courses for Acupuncture required by the state!	5/1/2015 7:40 PM
70	Dry needling is a travesty & I am disgusted with your profession for even considering it.	5/1/2015 7:34 PM
71	It is actions like this that contribute to substandard healthcare in the US. Licensed Acupuncturist are qualified. Too bad you are not working to integrate qualified practitioners and are instead seeking to certify unqualified practitioners. Shame on you.	5/1/2015 7:33 PM
72	Dry needling is acupuncture and should be subject to the same strict educational requirements for the safety of the patients.	5/1/2015 7:23 PM
73	As an acupuncturist, I can only laugh at your pathetic attempts to appropriate a 2,000 year-old system into your practice. We graduate from a 4-year master program. You have two years of training for your degree plus 24-hours to practice "dry needling." Stop perpetrating this scam on the public. Go to school if you want to be an acupuncturist.	5/1/2015 7:17 PM
74	Physical therapists are not trained in Chinese Medicine. They are not acupuncturists. This is negligent and putting the public at risk and should not be allowed. It takes 4 years of training to understand how to needle properly. Over 3000 hours of training. It's not easy to learn. It shouldn't be discounted. Don't allow physical therapists to do this.	5/1/2015 7:17 PM
75	This is an impingement on acupuncturist practice. Calling it dry needling spreads misinformation about acupuncture.	5/1/2015 7:13 PM
76	This is not enough training. It is a public safety risk.	5/1/2015 7:08 PM
77	It's unfortunate PTs can so grossly misrepresent acupuncture. They are using the tools of an acupuncturist regardless of name- acupuncturists also utilize motor and trigger points of muscles and is within their scope of practice, and what they received training for; PTs are not. If a 24 hour course was taken by a phlebotomist people would be outraged as this would cause possible harm, same parallels can be made when PTs are using a tool they are not familiar with that punctures the skin. Think about being stuck by a new phlebotomist and how painful it can be, simply bc the needles are filliform doesn't discredit the fact it isn't painful if placed poorly.	5/1/2015 7:01 PM
78	Again, I really don't think Physical Therapists should be taking on a bastardized form of acupuncture. Too great a risk of harming their patients. Just refer out to an acupuncturists!	5/1/2015 7:01 PM
79	Let's respect each other and do not cross the borders of our professional scope of practice. Thanks!	5/1/2015 6:53 PM
80	24 hours is not nearly a sufficient amount of training. These people will be inserting a medical device into patients. It is irresponsible and reckless to have so little training. the safety of patients is at stake- there have been numerous injuries such as pneumothorax by insufficiently trained PTs. I beg you to reconsider.	5/1/2015 6:47 PM
81	Dry Needling should not be allowed	5/1/2015 6:45 PM
82	Strongly against allowing PT to perform "dry needling". The insertion is considered an invasive procedure no matter what you call it. There is not adequate training to perform this procedure and places the public at a huge safety risk. I have over 20 years experience as an RN. This is not safe practice.	5/1/2015 6:39 PM
83	I do not feel a physical therapist should be allowed to do acupuncture (dry needling) because they do not go through enough training to puncture the skin of a patient. This is a loophole that needs to be closed. Needling into a patients muscles is a serious thing and 24hrs of training is not sufficient. Dry needling should be discontinued and left to acupuncturist. Thank you	5/1/2015 6:37 PM
84	You are out of your minds!	5/1/2015 6:30 PM
85	Please consider the safety of the constituents of AZ. This law will result in harm caused to Arizona people. Please reconsider the safety of all people who will be exposed to this.	5/1/2015 6:29 PM

86	This bill will be detrimental to patients, and is a hazard to their safety. It has been proposed for insurance billing purposes, which is obvious based on the laughably minimal educational requirements and complete lack of objective regulation by agencies competent in the proper clinical practice of acupuncture. It would be a travesty to put these patients at risk simply to raise the amount of billable codes that a PT can charge for per visit. Please reconsider allowance of dry needling as a practice, it needs to be repealed. The increased incidence of serious accidents and pneumothorax since the inception of dry needling should speak for itself in this regard. Unless a PT has been trained to the same standards as a licensed acupuncturist, including fundamentals of acupuncture theory and several years of observed clinical training by a qualified practitioner, there is no way that they are qualified to be needling any patient for any reason.	5/1/2015 6:28 PM
87	The only person I allow to needle me is my acupuncturist who has received 2000 hours of training. It is unsafe for other professions with so little training to perform dry needling. There is a great chance for pneumothorax and this bad word of mouth affects the acupuncture profession.	5/1/2015 6:22 PM
88	I would not go to any practitioner who had so little training.	5/1/2015 6:17 PM
89	Physical therapists should stay within their scope of practice which does not and should not include performing acupuncture.	5/1/2015 6:11 PM
90	Out of scope of practice, highly inadequate training, needles belong in the hands of well trained eastern medical practitioners.. this is not short of criminal, I hope with the first accident the state board is sued for negligence	5/1/2015 5:58 PM
91	Resort evaluate please. This is unsafe!	5/1/2015 5:55 PM
92	Please please please require many more hands on hours needling before certification	5/1/2015 5:55 PM
93	Dry needling is acupuncture. If any healthcare practitioner would like to use acupuncture needles in their practice, then they should be a board licensed acupuncturist.	5/1/2015 5:36 PM
94	You will have more pneumothorax cases than you have ever had before if you pass these training standards.	5/1/2015 5:32 PM
95	Why should PT's even consider doing "dry needling" (aka ACUPUNCTURE)???	5/1/2015 5:24 PM
96	24 hours of training is absurd and a huge safety concern! Physical Therapists should have to meet the 2,000 hours of training requirement set forth by the American Academy of Medical Acupuncture to be able to perform "dry needling".	5/1/2015 5:19 PM
97	Dry needling is acupuncture and is not in the scope of practice for PT's, therefore should be regulated by the acupuncture board.	5/1/2015 5:09 PM
98	In no way would I as a consumer trust a physical therapist with dry needling, just as I do not trust a Chiropractor to practice dry needling. The study and scope of acupuncture is so broad and intricate. Someone not fully trained in all the details may actually harm a patient. This would not instill trust as a provider at all. do not permit this to proceed.	5/1/2015 4:56 PM
99	Acupuncture is an effective medical modality with many benefits. It is thousands of years old and those who have studied it should be respected for their talent and training. Allowing anyone to insert needles into people to relieve pain with only 24 hours of training is a travesty! Only licensed acupuncturist that are Board certified by the NCCAOM should be allowed to do this. If anyone gets injured by someone less qualified, the acupuncturists take the hit. Please, leave it to the professionals!	5/1/2015 4:55 PM
100	Who ever thinks they are so smart and educated to do 24 hours of training and then treat people is beyond stupid and their ego is likely to land themselves in jail for the death of another by bad needling practices of the unknown because there was not enough education time.	5/1/2015 4:52 PM
101	I think you are overstepping your bounds and putting the public at risk by having unreasonably low expectations of training by your therapists. This also crosses into the territory of most medical acupuncture providers and should meet their standards at the absolute minimum.	5/1/2015 4:42 PM
102	Very vague legislation/rules for such an important matter!	5/1/2015 4:30 PM
103	I can't believe the PT board thinks this is appropriate. As a licensed acupuncturist, I am offended and appalled. I do know that acupuncture works and that is why the PT's desired it in their scope of practice, but the training here is so sub-par I can barely put words that would describe my dismay. I seriously hope you reconsider the dissecting of a 5000 year old medicine and giving it to under-trained people to perform mediocre at best medicine on the general public. Send them to acupuncture school for the min. requirement of 1250 hours!	5/1/2015 4:28 PM
104	If a Physical Therapist want to be an Accupuncturist then they should attend licensing training equivalent to that of an Accupuncturist.	5/1/2015 4:27 PM

105	I do not believe PT's should be performing dry needling at all.	5/1/2015 3:53 PM
106	24 hours of training is absolutely ridiculous and can be dangerous in my opinion. Dry needling is acupuncture and should have to follow acupuncturist guidelines and hours of training.	5/1/2015 3:51 PM
107	24 hours is NOT a sufficient amount of training for a PT to perform acupuncture (dry needling). As a Licensed Acupuncturist myself, I was required to obtain over 1,000 hours of training. Therefore I feel there is a serious public safety concern due to their lack of education and training in needling. I feel it would be in the best interest of consumers/patients to require more training for PTs who wish to needle.	5/1/2015 3:34 PM
108	Leave acupuncture to the acupuncturist. I will not support "dry needling."	5/1/2015 1:49 PM
109	California does not allow anyone other than a licensed acupuncturist to perform acupuncture. Please use California as an example of professional respect and dignity. This is not only a threat to public safety, but an offense to those who have dedicated years of their lives to the study of acupuncture. We know how complex and in-depth the study is but those who haven't studied it do not. And that is terrifying.	5/1/2015 11:22 AM
110	If a person is getting punctured with a needle is that not acupuncture...why is not overseen by those who have training in acupuncture?	5/1/2015 8:41 AM
111	Stop this now before people get hurt	5/1/2015 2:15 AM
112	I am extremely disappointed that the Arizona Board of Physical Therapy is promoting the dubious practice of "dry needling". 24 hours of training is a joke. If a PT is using acupuncture needles and placing them in "ashi" or trigger points on the body then they are practicing acupuncture without a license. You cannot dress this up in any other way. I urge you to abandon this dangerous coopting of Acupuncture's scope of practice. Thank you for your time and consideration.	4/30/2015 10:19 PM
113	The total minimum contact hours of 24 hours is ludicrously inadequate to ensure PT does no harm and actually achieves benefits and health gains for consumer. Consumer better off seeing acupuncturist and PT should refer this out rather than presume they can adopt this modality with any efficacy or sane level of safety with just 24 hours of training. Acupuncturist training entails 1800 supervised clinical hours before completing their degree program and then they take a national board exam to further demonstrate their knowledge of how to safely and properly administer acupuncture. Dry Needling is acupuncture. Typical continuing education training is 15-24 hours so rather than being skillfully educated to properly perform and understand the nuanced and sophisticated effects of inserting needles and puncturing the skin, this ruling allows PTs to perform dry needling (using the very same needles used in acupuncture) with inadequate preparation and knowledge. Why? Simply being able to bill for the service is not justification to offer it. This ridiculously low training standard is sure to discredit the profession of physical therapists and put people at risk for severe and unnecessary injuries by unskilled PTs. A training minimum greater than that for MDs would take into account their anatomy and physiology training, but anything less than 1,000 hours of supervised clinical training makes a mockery of the elegant systems thinking associated with acupuncture for centuries and tells the public that their safety, comfort, and health outcomes mean less than the profit motive. Individual PTs wishing to participate in this without receiving meaningful training commensurate with that required for those licensed to practice acupuncture should be required to disclose their training level of preparation and let the healthcare consumer decide if they would prefer instead to seek a well-qualified acupuncturist to use the very same needles for relief of pain or whatever else the PT purports to do with this "shiny toy modality." Consent that is not informed is not true consent.	4/30/2015 10:00 PM
114	There has been no substantial change to upgrade the education and training standards since the hearings before 2014.	4/30/2015 8:28 PM
115	Dry needling is just another name for acupuncture, and if PT's want to practice it they should be required to have at least 800 hours of training in acupuncture.	4/30/2015 7:53 PM
116	If physical therapists wish to perform acupuncture, I have no problem with that desire. Let them do the training required of acupuncturists, so that they truly understand what it is that they are doing. I have high respect for physical therapists. They work hard with difficult patients. They could do amazing work combining acupuncture with physical therapy. But not with "acupuncture light". Acupuncture is not a procedure. It is one of the healing arts. Let them truly train in the discipline, so that they can utilize its full potential for healing.	4/30/2015 7:22 PM
117	I find it disturbing how little experience is needed to dry needle.	4/30/2015 7:11 PM
118	I hear more and more people describing their dry needling experience that didn't work. You ought to consider why...	4/30/2015 6:24 PM
119	Dry needling should not be practiced by physical therapists.	4/30/2015 6:07 PM

120	THIS IS A REALLY POORLY THOUGHT OUT IDEA OF HOW TO GET OUT OF BECOMING AN ACUPUNCTURIST. THE PUBLICS SAFETY IS AT RISK AS WELL AS YOUR LICENSES.	4/30/2015 4:51 PM
121	Physical therapists are performing acupuncture in disguise and should therefore be held to the same standards as licensed acupuncturists	4/30/2015 2:52 PM
122	Education and training hours requirement should be at least 1000 hours	4/30/2015 2:06 PM
123	As someone who has already been through the dry needling certification course, will be required to undergo a written and practical exam again to prove my qualification? I've been performing dry needling for the past 2 years. Physical Therapists who have been trained and have been performing dry needling prior the approval of these rules should be grandfathered in.	4/30/2015 11:55 AM
124	I cannot believe that a physical therapist or the AZ board has a patient's best interest at heart by renaming and creating: a shortcut to performing acupuncture (whatever new name you want to call it); being fully trained and credentialed in 24 hours; and so many other reasons already in the ARS. If the AZ State board of physical therapy wants to have acupuncture income- they should hire "REAL" Acupuncturists and keep the profession of Traditional Chinese medicine unscathed from malpractice from unqualified 24 hr online trainees doing acupuncture.	4/30/2015 11:44 AM
125	the current form of 'dry needling' is not well explained and in its current form lacks clear professional criteria and the training requirements are dangerously low. The presentation to the public is confusing and misleading. The PT's practicing this are frankly in danger of committing malpractice. I fully support exploring new modalities (as a western medicine practioner) and adding skills for clinical enhancement ,however the current training shallow and limited and promotes dumbing down a complex and useful tool.	4/30/2015 9:47 AM
126	Dry needling is acupuncture. Renaming acupuncture and reducing it to a dangerous therapy is not safe. I have personally treated patients injured by PTs attempt at acupuncture.	4/30/2015 8:24 AM
127	Do NOT give PTs separate regulation to function as an acupuncturist. They should attend acupuncture school and be tested in acupuncture. In California, PTs and Chiropractors who wanted to function as acupuncturists enroll in Acupuncture School. They complete the classes, clinic and testing before they can even sit for the licensing exam, and then receive an actual license to practice acupuncture. PROTECT THE PUBLIC!	4/30/2015 2:16 AM
128	PTs performing acupuncture, aka dry needling should be illegal. In short, it is negligent and time will show when you're profession continues hurting patients with your ignorance and arrogance.	4/30/2015 12:27 AM
129	The Board should adopt an immediate and ongoing study of adverse events from filiform needles. You will see a dramatic rise in events, and the Board has a duty to track the injury to the public.	4/29/2015 9:40 AM
130	Thank you for taking the time to further PT in breadth and depth of topics and providing a service to the population. However, I would prefer PT not provide accupncure and leave the discipline to the acupuncturist. Thank you, Keith Cyrnek.	4/28/2015 10:40 PM

131	<p>Dear Members of the Physical Therapy Board, I appreciate your enthusiasm for the wonders of dry needling (which is, regardless of how it is called, still considered acupuncture, namely puncturing of the skin to stimulate a response. Dry needling uses the same points and needles as acupuncture to achieve the same effects). It is clearly amazing what needle stimulation can achieve in improving health and relieving pain. My greatest concern is safety, as I believe that 24 hours of training is woefully insufficient and puts the public at risk. It also risks great damage to your profession because even on its face, two weekends of training is substantially low. -The international (WHO), national (www.ACAOM.org), and current Arizona standard for needling is at least 1850 hours specifically in didactic and supervised clinical practice in acupuncture (1200 if you exclude the biomedicine sciences). Anything less by a non-primary care physician (MD) endangers the public. -Arizona does permit the practice of acupuncture with less training than what is required nationally and by Arizona, for the purposes of treating addiction. In order to practice, these auricular detox specialists are limited to a standardized treatment of 5 points in the ear. The training required for this limited treatment is 30 hours of didactic classroom time with 40 hours of supervised clinical practice. These 70 hours limit the practitioner to the single treatment in the ear. This guarantees some level of skill in administering this specific, limited treatment. Requiring only 24 hours for needling training (without any supervised clinical training) anywhere in the body ensures no skill whatsoever. In closing, I would like to quote the AAMA policy statement, which indicates that physicians also find 24 hours too low: AAMA Policy on Dry-Needling Marshall H. Sager, DO, FAAMA Rey Ximenes, MD, FAAMA The American Academy of Medical Acupuncture (AAMA) is the premier North American organization of physician acupuncturists. The AAMA is committed to insuring public health and safety by ensuring that all persons practicing any type of medicine, including acupuncture, are properly trained and educated. It is imperative that courts and medical bodies maintain and practitioner could, as a result of lack of education or ignorance, cause substantial medical injury. Acupuncture, like Western Medicine is a complex subject. It cannot be mastered in a weekend or in a month. All AAMA members in addition to four (4) years of medical school (MD or DO), must have 300 hours of didactic and clinical acupuncture education and training. A non-physician must have in excess of 2,000 hours of clinical and didactic education and training before they can become certified to treat patients in most states. Dry needling is the use of solid needles (contrasted with the use of hollow hypodermic needles that are used for injections) to treat muscle pain by stimulating and breaking muscular knots and bands. Unlike trigger point injections used for the same purpose, no anesthetics are used in dry needling. There is controversy regarding the definition of dry needling. Licensed medical physicians and licensed acupuncturists consider dry needling as Western Style Acupuncture or Trigger Point Acupuncture whereby the insertion sites are determined by tender painful areas and tight muscles. These sites may be treated alone or in combination with known acupuncture points. Other practitioners take the position that dry needling is different from acupuncture in that it is not a holistic procedure and does not use meridians or other Eastern medicine paradigms to determine the insertion sites. Dry needling is an invasive procedure. Needle length can range up to 4 inches in order to reach the affected muscles. The patient can develop painful bruises after the procedure and adverse sequelae may include hematoma, pneumothorax, nerve injury, vascular injury and infection. Post procedure analgesic medications may be necessary (usually over the counter medications are sufficient). There has been controversy in the United States as to who is qualified to practice dry needling. Since it is an invasive procedure using needles, many take the position that it should only be performed by licensed acupuncturists or licensed medical physicians (M.D. or D.O.). In Illinois, this sentiment was echoed by a decision to reverse legislation permitting physical therapists to perform dry needling. These and other practitioners were performing this procedure who are not trained nor do they otherwise routinely use needles in their practices. The AAMA recognizes dry needling as an invasive procedure using acupuncture needles that has associated medical risks. Therefore, the AAMA maintains that this procedure should be performed only by practitioners with extensive training and familiarity with routine use of needles in their practice and who are duly licensed to perform these procedures, such as licensed medical physicians or licensed acupuncturists. December 9, 2014 Adopted unanimously Board of Directors of AAMA Clearly the national medical community, with the exception of a subset of the physical therapist community, thinks that needling with only 24 hours of training is a mistake, a danger to the public, and an overreach by the physical therapy profession. In light of the acknowledged risks and mandated training for others who perform acupuncture, it would be wise to ensure that there is sufficient training for physical therapists...and a substantial amount of supervised clinical practice. In the end, it would be healthier for all concerned to simply require a minimum number hours of no less than 1200 hours of training (the national and international standard), including supervised clinical practice (500-800 hours). This is the standard that the medical community has established and respects. To engender respect for the physical therapy profession, including from its patients, aiming for more education, not less, is advised. Sincerely, Catherine Niemiec, JD, LAc. President & CEO Phoenix Institute of Herbal Medicine & Acupuncture (PIHMA), College & Clinic</p>	4/28/2015 10:39 PM
132	<p>As a person who has experienced dry needling I would insist that the training is inadequate. My experience was painful and caused increased discomfort. I hear the same from the large majority of people who experience it.</p>	4/28/2015 4:19 PM
133	<p>Dry needling = acupuncture. Leave it to the professionals if you do not want a lot of negative feedback and lawsuits. No one can safely learn acupuncture in 24 hours.</p>	4/25/2015 12:28 AM
134	<p>Physical Therapists cannot and should not practice acupuncture/dry needling without being a licensed Acupuncturist get real and stop lying to the public...</p>	4/24/2015 8:46 PM

135	I think you should track problems and complaints for "Dry Needling" separate so you can see if the minimum training you require is adequate. Require the minimum standards be revisited in 2016.	4/24/2015 6:55 PM
136	I find this an incredibly unsettling proposal. Basically, a physical therapist would be performing acupuncture, even though its being termed "dry needling" with only 24 hours of training. This is not only dangerous to patients, but also to physical therapists who may unintentionally harm their patient leading to future litigation, due to their lack of training. I am an acupuncturist and I truly do not believe one can have a full understanding of this practice after a weekend. The argument I hear from my friends who are PTs is that "dry needling" is only working on the muscular and neural layers of the body, so not acupuncture. This argument only demonstrates the ignorance of the physical therapy profession about the energetic dynamics of the body. By inserting needles into trigger points, i.e. acupuncture points, one is affecting the energetic dynamics of the body. There is no argument to that and not understand how those dynamics work can greatly injure a patient. I understand that we all want to help our patients, but I can take a weekend seminar on stretching techniques and exercises for pain relief for patients. Would you not agree that I might not fully understand the practice the way a PT would and potentially harm a patient? Please, lets keep our patients' best interests in mind, keep the needling to the acupuncturists who have at a minimum 3 years of training. Thank you.	4/24/2015 6:06 PM
137	This is not about money. I have plenty of patients and financial abundance. This is really about safe, competent practice. It would be outrageous for me to skip 98% of the training to be a PT, take a weekend course and call it good. Please think and watch out for the patient and consumer. You are risking the health and lives of many.	4/24/2015 5:58 PM
138	Should be deleted and not available	4/24/2015 4:55 PM
139	Please consider banning this practice.	4/24/2015 4:26 PM
140	24 Hours of training is less than that if MD's who are legally allowed to do acupuncture in their states. In most states this is between 200 and 300 hours. 24 hours is, quite honestly a joke and likely to lead to many oroblems, including potential organ puncture.	4/24/2015 3:31 PM
141	Please consider that dry needling is acupuncture. This is not within the scope of their training, adding 24 hours of education is extremely insufficient to provide safe care to patients. This is extremely risky to consumers, please do not allow this.	4/24/2015 2:51 PM
142	24 hrs is significantly less training than DC's that must get 100hrs and MD's must get 300 hrs. When did PT's decide to insert anything into the body and so very little training, let alone practice.	4/24/2015 2:33 PM
143	this is unethical, dangerous, and damages multiple professions (pt and acupuncture) whose intention is ultimately to help people because of ego. why not leave the needling to the experts who have thousands of hours of training? would you go see a surgeon with only 24 hours of training? absolutely not. why? because it's NOT ENOUGH. check the egos at the door. leave the pt to the pts, that is what they are an expert in. leave the needling to the acupuncturists, that is what they are expert in.	4/24/2015 1:56 PM
144	Physiotherapists are not trained well enough and they don't deserve to take food away from my children. I have 11 kids	4/24/2015 12:26 PM
145	PTs do not have the 3200 hours of didactic and clinical training that Acupuncturists have. Inserting needles is an invasive procedure that requires years of training.	4/24/2015 8:16 AM
146	PTs who have been doing dry needling have been telling their patients that they do acupuncture, and the patients believe it and don't get full treatments like they would from a licensed acupuncturist. Things get missed !	4/24/2015 1:08 AM
147	Please do your homework on Acupuncture. The people who are advising and consulting with you are fools.	4/24/2015 12:10 AM
148	Complete proper training first and get an Acupuncture license, as that is what you are doing without the proper education.	4/23/2015 10:40 PM
149	Please stop this law. It is a disaster. Make them meet the same standards as real acupuncturist and qualify through NCCAOM for the best care.	4/23/2015 9:13 PM
150	So far states are letting any professions do acupuncture. This is a part of traditional Chinese medicine and the points have purpose. There are times you do not use certain points, and I have seen PT's and Chiropractors do harm to patients by not knowing what they are doing. Do NOT let this pass. You are making a farce out of a 4000 year old medicine.	4/23/2015 8:40 PM
151	My understanding is that invasive procedures are not part of P.T. scope of practice. This survey would carry more weight If it were reviewed by someone other than a P.T.	4/23/2015 5:48 PM

152	As an educator who teaches needling techniques to acupuncture students, I recommend at least a 50+ hour course for certification. 24 hours barely gives enough time for the stated content related to safety, contraindications, and anatomical review. If PTs actually desire to get efficacious results with dry needling, extra hours are absolutely necessary to properly understand indications, needling techniques (proper selection of needle gauge and length, manipulation techniques for various indications), strategies for selection of needling sites, etc. Only 24 hours of education will inevitably lead to poor clinical results, adverse events (compromising the safety of the AZ public), and eventually a negative public perception of all practitioners performing needling therapies. Please strengthen the education requirements for dry needling by PTs.	4/23/2015 12:35 PM
153	Dry needling is clearly acupuncture which requires 2000+ hours of training. This is an infringement on the acupuncture scope of practice and should not be permitted.	4/23/2015 10:30 AM
154	adding dry needling is NOT physical therapy. Acupuncture should be done by trained and legal acupuncturists.	4/23/2015 9:14 AM
155	Please revisit this. When PTs are passionate about acupuncture please have them go to acupuncture school.	4/23/2015 8:36 AM
156	Dry needling is a form of acupuncture, they should go to acupuncture school if they are not satisfied with their current tools at their disposal and they want to practice another form of medicine. Use the referral system and allow those that are properly trained with 100's of hours of academic and clinical training in needling do the job.	4/23/2015 7:04 AM
157	PTs should not perform Dry Needling (unless you allow massage therapist to perform physical therapy?)!!!	4/23/2015 6:43 AM
158	"Dry Needling" is acupuncture performed badly by PTs. As a licensed acupuncturist, I am already having to "undo" damaged caused by PTs "dry needling"	4/23/2015 5:53 AM
159	Dry needling performed by undertrained practitioners leads to injury.	4/22/2015 11:45 PM
160	Needling with acupuncture needles is acupuncture. Refer patients to Licensed Acupuncturist with over 3000 hours of training!	4/22/2015 9:57 PM
161	The extent of this consideration in broadening a PT's practice can and potentially will, overlap other more qualified practitioners' training. Those practitioners also carry advanced training in body mechanics, multiple courses in A & P, as well as are able to perform micro-adjustments, taping of tendons/ligaments/muscles, etc. It is inappropriate to believe one type of practitioner "fits all". We must work together and assist our patients in finding the BEST care available within one another's scope of practice.	4/22/2015 9:52 PM
162	I was in a rehab center after an accident. I had a young girl say we are going to do something that you probably have never heard of or know nothing about. She said that even Acupuncture has never used these points trying to impress me. She needled points I have used for years and had no idea what they were used for; other to say that they would help my pain NOT! When I told her what I did for a living, she almost went in hyperventilation. 4 years of educational classes is what is needed. Or dump this crap before someone thinks they know what they are doing and hurts someone and the Great state of Arizona gets sued.	4/22/2015 9:46 PM
163	Does 24 hours of Physical Therapy training ensure the safe practice of Physical Therapy?	4/22/2015 9:32 PM
164	Again, I do not think it is enough education for this entirely new area for PT (breaking the skin). There are not any clinicals attached to this education. The certification organizations suggested are mostly PT profession driven, not regulatory. There is no oversight or supervision by a proper Medical Professional for this breaking of the skin. And there is very great possibility of both insurance fraud and even more concerning, harm to the public.	4/22/2015 7:30 PM
165	I feel patient safety is at major risk	4/22/2015 6:30 PM
166	PTs shouldn't be allowed to perform dry needling this is called acupuncture for centuries, you can not just make up a new name and definition to allow PTs with minimal education perform this job	4/22/2015 5:28 PM
167	24 hours of education is a joke compared to the training medical doctors and chiropractors need in order to perform acupuncture which is in fact what dry needling is	4/22/2015 4:52 PM
168	Not acupuncturist and attempting to do Acupuncture by changing language but not therapy..dangerous and essentially a deception	4/22/2015 4:52 PM
169	Please consider Military trained personnel. They are trained by the instructors of Kinetacore, and are given a certificate with the number of dry needling hours, and must pass a written test. However, they are not given a "Kinetacore" certificate. I do not think the training should be limited to non-military training. Possibly the training should be nameless as long as it meets all standards previously discussed.	4/21/2015 10:55 PM
170	how is the education of PT's that much more superior than that of DC's or MD's who have to obtain many more hours of education / training in order to put needles in patients?!	4/21/2015 11:07 AM
171	I don't agree with dry-needling or PTs doing this.	4/14/2015 9:04 PM

172	I believe that the requirements are too strict. Incidence of injury is so low and therapy education is so high that a requirement for continuing education seems a bit ridiculous.	4/13/2015 9:26 PM
173	As you well know, it is common knowledge that all of this is simply about continuing to mislead the public and the law... at the risk and disregard of public safety by circumventing acupuncture law.	4/13/2015 8:13 PM
174	Dry needling is merely a subset of acupuncture skills and as such should only be practiced by Licensed Acupuncturists (LicAc) who have completed the 3+years of graduate level training in acupuncture and passed national acupuncture board exams.	4/11/2015 2:38 PM
175	Do what you are trained to do well. Don't try to be the "Jack of All Trades." The physical abuse to patients by dry needling across the country is atrocious. PTs will be prosecuted. Your profession will be knick named Physical Abuse Therapy. What is your next 24 hour training program ? Hip and knee replacements ?	4/11/2015 6:51 AM
176	I feel that the legislative efforts are to be applauded and the standards set forth concerning DN in AZ are appropriate and should empower physical therapists who meet them to offer this as a safe and effective treatment option for the public.	4/10/2015 5:22 PM
177	24 contact hours of education is a woefully inadequate number of hours to practice the art of Dry Needling! To learn the energetics underlying the trigger point being needled takes many many hours of study and practice. Shame on you! Physical therapists are not qualified to judge training requirements for dry needling!	4/10/2015 2:52 PM
178	Please review the educational requirements for a professional license in acupuncture in almost all states.	4/10/2015 2:19 PM
179	I totally disagree with letting PTs do this technique with so little training.	4/10/2015 11:39 AM
180	The biggest concern for me is the documentation and the billing components. Please make sure that these are clear so that we are covered. Thank you!	4/7/2015 11:13 PM
181	I believe this to be satisfactory for the purposes of introductory dry needling application by a licensed Physical Therapist.	4/7/2015 3:15 PM
182	Be careful of those who profit from courses wanting them to be more hours as more than 24 will dictate that it's a staged process meaning therapists will double the costs and make the course owners more profit. 24 is plenty	4/7/2015 8:38 AM
183	None	4/6/2015 10:09 PM
184	The lack of provisions for therapists who have been practicing dry needling already is of concern. On a separate note, consider looking ahead and consider establishing rules for use of diagnostic ultrasound in PT before manufactures and their sales staff do. Has any similar set of rules been established for cold laser or "shock therapy"? Not exactly apples to apples, but...	4/6/2015 9:56 PM
185	While you have added that the licensee will pass an exam, it seems that there should be more supervision and training required (for a longer period). Under the current rules, a PT could possibly come out of a 3-day course, pass the test (the criteria for passing did not seem to be included in this survey), and then practice without restriction. It seems that there should be some sort of period of supervision with such an invasive practice intervention.	4/6/2015 7:37 PM
186	Dear Board Members: I have been actively practicing 'Dry Needling' for two years now and was formally trained to do so. I am concerned that these new regulations will require me to 'retake' (at great expense) a Dry Needling course to ensure that the requirements are met. Is there any consideration being made for practitioners being 'grandfathered' that have ongoing and current clinical experience with Dry Needling? Respectfully, D. Chitwood, PT	4/6/2015 4:16 PM
187	Thank you for allowing me to comment on the draft rule language. Joni	4/5/2015 10:30 AM
188	For the most part I feel these drafted rules are fair and appropriate as the state moves forward with safe practice of dry needling. I also feel the time between Jan 2014 and Jul 2015 should be addressed one way or another. I look forward to following the process on the development of these rules. Thank you for giving the PT community a voice.	4/5/2015 9:08 AM
189	I took a level 1 and level 2 course last year (2014) before the ruling came out. Will I need to retake that course or any other dry needling course once the rule is finalized or will that course suffice (as long as it meets these guidelines)?	4/5/2015 7:59 AM
190	Specifications for physical therapists who are attempting this in the field while doing home health versus doing this in a controlled clinical environment are needed.	4/4/2015 8:07 PM
191	More hours required for anyone who wants to dry needle. It is not something that should be taken lightly. there are a lot of needling courses now and the good ones require 100 hours to pass certification.	4/4/2015 7:26 PM

192	All dry needling courses should have examined a therapist's ability to perform the technique safely and effectively in a practical examination setting before being awarded any CEU's. For those who have already completed training and are practicing, their competency could be assumed based on passing their practical exam, as a written exam does not imply safety and efficacy.	4/4/2015 9:34 AM
193	Looks good!	4/3/2015 11:23 PM
194	Rules are in order. I think a one time certification should not be enough for a life time use of the Dry Needling. Practitioners should renew certification every 5-10 years. This may allow the profession cont. research and enrichment of the modality.	4/3/2015 10:33 PM
195	Thank you for helping our field to progress. Ginger, PT	4/3/2015 5:54 PM
196	I am very glad to see the rules moving forward. Thank you to the AZ board!	4/3/2015 4:48 PM
197	Is there ANY other intervention that requires this sort of additional certification to the Board? Why is dry needling being singled out like this? I'm worried about the precedent. Is wound debridement next? Thrust joint manipulation?	4/3/2015 4:30 PM
198	Well Done	4/3/2015 2:47 PM
199	I would like to see the Board stand up for Physical Therapists and the Profession better. I feel like you focus too much on outside people, ie the public and other professionals, than you do on defending us as a profession. As a PT I feel like there is no unity between the board and how each individual PT is regarded by the board. We pay our dues to the board, the board should be on our side more than the public's.	4/3/2015 2:03 PM
200	Excellent way to ensure that PTs are qualified to protect the public. Thanks for your work!	4/3/2015 11:26 AM
201	Overall I think it looks great. These standards need to be release soon giving therapist the time to complete any courses prior to July 1, 2015.	4/3/2015 11:22 AM
202	Physical Therapists that provide this much needed treatment is appropriate and it is the right thing to do for our patients.	4/3/2015 11:12 AM
203	A good draft with a few glitches related to CAPTE and the omission of credentials for the individual who will teach a dry needling course. I would be glad to advise on language if desired. Thanks for the effort on this issue, Jim.	4/3/2015 9:30 AM
204	no comment	4/3/2015 8:51 AM
205	Kinetacore training is very thorough	4/3/2015 8:23 AM
206	I am not involved in dry needling, but do see the benefits that can be derived from its practice. I feel that PTs have the knowledge base to be effective practitioners in this tx with appropriate training.	4/3/2015 8:22 AM
207	Please address cont ed for this specialty within the license renewal process.	4/3/2015 8:18 AM
208	I have been performing dry needling for 5 years following completion of training, with no history of issues and full compliance with the aforementioned regulations now being instituted. I am not sure how I feel about having to go and take the time and pay for another course to do the same thing I have been doing. I was hoping there would be stipulations present that would allow for certain practioners to avoid this.	4/3/2015 6:59 AM
209	I don't understand enough about the rules to comment	4/2/2015 11:04 PM
210	Dry needling should be marketed and promoted as a top tier skill for this profession. Due to this, we need to ensure it is very well regulated, controlled, and the criterion to become a tatician is limited to Physical Therapists only. I thoroughly respect the practice of acupuncture, its individual and differing philosophies, and the difficulty to obtain certification. Because of this, I believe it is our duty to keep a tight and well trained group of dry needling practitioners.	4/2/2015 11:02 PM
211	please provide guidance for therapist that completed courses after Jan 1, 2014 and have been waiting for the board to make a decision on the dry needling guidelines and not able to use these skills while waiting for the decision.	4/2/2015 10:26 PM
212	I appreciate the time and attention that has gone into this matter, and hope that it gets finalized soon. It would be unfortunate if the rules were so specific that they become outdated in the coming years, since it takes so long to work through the process.	4/2/2015 10:16 PM

213	If someone has completed the same number of hours and examination in another state or country that is comparable in education and testing you should NOT have to sit the exam, RECIPROCITY should be acceptable, a PT has completed the same procedure with the NPTE to gain licensure and states should recognize this not make it a separate issue. Why have a nationalized board exam then individual states still do not give reciprocity, it is arcane	4/2/2015 10:01 PM
214	So I took the courses from Kinetacore FDN1 and FDN2 in 2012 and 2013. Do I just send the certificate for compliance?	4/2/2015 9:47 PM
215	I believe a list of qualified organizations providing dry needling certification should be listed on the azpta website.	4/2/2015 9:35 PM
216	AZ board should rate courses and list acceptable ones that meet standards	4/2/2015 9:31 PM
217	I have already paid for this course, but was but practicing before required time. I do not believe I should have to take it and pay again	4/2/2015 9:04 PM
218	I would love if we could get this said & done prior to July 2, 2015.	4/2/2015 8:55 PM
219	I would suggest a one year experience as a practicing physical therapist prior to approval for taking a dry needling class for certification.	4/2/2015 7:27 PM
220	I am disappointed that it has taken over a year to draft the rules for dry needling.	4/2/2015 7:25 PM
221	I feel strongly that physical therapist scope of practice allows dry needling with successful completion of an accredited course without new regulations and kowtowing to pressure from questionably trained acupuncturists. I am more concerned about litigious chiropractors attacking physical therapists for spinal manipulation.	4/2/2015 7:23 PM
222	Look forward to learning needling.	4/2/2015 7:18 PM
223	NC	4/2/2015 7:17 PM
224	overall excellent standards please reconsider approval mechanism organizations	4/2/2015 6:52 PM
225	Thank you for your hard work. Please let me know the current requirements for practicing "dry needling" physical therapists.	4/2/2015 6:46 PM
226	The board should take caution with placing measures for skill development. Could be a slippery slope for other areas of our profession that could make it overbearing and taxing on our professionals to further skill development. What happens if schools adopt dry needling in their curriculum?	4/2/2015 6:38 PM
227	Thanks for your work on this!	4/2/2015 6:21 PM
228	Some type of concession or grandfathering needs to be made for those that took a course and met all the requirements between 1/1/14 and 7/1/14 when the law went into effect.	4/2/2015 6:12 PM
229	If the purpose of these rules is to protect the public, then they are NOT necessary because the PT rules already to so, by mandating that physical therapists exercise judgment and competence in their duties. If the rules are to appease other health professionals, then I would demand that the Board represent the interests of the PT profession by asserting the fact that Physical Therapists are autonomous professionals, who are adequately trained, and are required to act within the scope of their training and knowledge.	4/2/2015 6:04 PM
230	How do we handle therapists that took a course last year and did not send documentation to the board within 30 days? I took a great class last year and have not used this skill yet, and did not send proof of completion within 30 days.	4/2/2015 5:54 PM
231	The Board has done a good job here. It is unfortunate that the job had to be done as physical therapists providing dry needling were already practicing within their scope and did not pose any threat to the public that the Board wouldn't have been able to deal with without this additional quasi regulation.	4/2/2015 5:48 PM
232	Flip flopping is the result of the disfavor of the acupuncturists and their cash business. They had to unite to do their business. I did not take the course out of malice for the acupuncturists. I get great results from needling, I have many years experience and think this is a dollar and cent activity. I feel very confident in my skills.	4/2/2015 5:43 PM
233	Thank you for clarification	4/2/2015 5:42 PM
234	Caution should happen with the number of hours, as therapists may start needling untrained body parts if able to start needling after only 1 class. 25 hours typically covers either upper or lower extremity.	4/2/2015 5:23 PM