



# NH Acupuncture & Asian Medicine Association

*A Voice for Asian Medicine in the Granite State*

Greetings,

This letter concerns HB 575 relative to the certification of acupuncture detoxification specialists. The proposed bill modifies RSA 328-G to create a category of professionals who are authorized to practice acupuncture detoxification treatments.

Notice of this bill has been raised to the New Hampshire Acupuncture & Asian Medicine Association (NHAAMA). The association wishes to raise a number of concerns about this bill. We have three concerns in particular:

1. **It is not clear who is meant to supervise the treatments being given.** Properly trained and licensed acupuncturists acknowledge many possible complications that can occur during acupuncture detoxification treatment, not all of which are accounted for in acupuncture detoxification specialist training. For the safety of those receiving care the NHAAMA believes it is imperative that treatments be supervised by a properly licensed acupuncturist, who is available on-site to address any complications at the time they arise. This bill makes no provision for any kind of supervision, from any professional, under any circumstance.
2. **It is not clear the board of acupuncture licensing can fulfill the obligations required in the bill.** The bill text states in section 4 that “The board [of acupuncture licensing] shall certify as an acupuncture detoxification specialist an individual...who has...complied with the rules of the board adopted pursuant to RSA 328-G:7, XIV.” The rules the board is to adopt includes “Procedures for license renewal, including continuing education requirements, testing, peer review, or other appropriate procedures, and methods to ensure compliance with such requirements.” (RSA 328-G:7, III) and “Establishing and enforcing ethical and professional standards to be met by each licensee including, as necessary, requirements for proficiency in specialty practice.” (RSA 328-G:7, V). The National Acupuncture Detoxification Association (NADA) – the standard-bearing organization being looked to by this bill for training in acupuncture detoxification – does not require continuing education or active membership in its organization. It is unclear from NADA if continuing education is regularly provided or what subjects are covered. Without such guidelines in place by the addiction treatment community the board of acupuncture licensing cannot fulfill its requirement to ensure certified acupuncture detoxification specialists keep current their education and proficiency.
3. **It is not clear how the board of acupuncture licensing is to handle recertification.** Continuing from concern (2) above, if the board cannot determine if certified detoxification specialists are properly refreshed in their training then it is also impossible to determine appropriate recertification guidelines. It would be equally inappropriate to have the certification continue indefinitely, as proper clean needle practices and other safety procedures are continually evolving.

The NHAAMA sympathizes with the ongoing crises of addiction facing the New Hampshire populace, and shares the desire to see swift action taken. However, we believe this bill compromises the long-term safety of medical practice in the state of New Hampshire to address a short-term need. Given the above concerns, it is the position of the NHAAMA that **the bill as written should be retracted**, that discussion is opened with the Board of Acupuncture Licensing to determine the feasibility of

implementing the above, that the bill should be revised to address the concerns stated above, and then resubmitted for approval.

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President

New Hampshire Acupuncture & Asian Medicine Association