



# NH Acupuncture & Asian Medicine Association

*A Voice for Asian Medicine in the Granite State*

Greetings,

This letter is in **regards to the amended revision of HB 575** (relative to the certification of acupuncture detoxification specialists) that passed the House and has since moved to the Senate.

Our association continues to monitor this bill through the legislation. We are committed to ensuring the certification of acupuncture detoxification specialists. It is our hope that we are able to ensure certification happens in the safest and most expedient manner possible for the public's welfare.

Many of our former concerns have been addressed, but some still remain. **It is our position that the following amendments be made to the bill:**

- 1. The bill should explicitly state types of locations where acupuncture detoxification should be practiced - we recommend in hospitals, addiction rehabilitation facilities, and any future places the board of acupuncture licensing shall approve.** The NADA protocol is intended to be just one part of a comprehensive strategy to addictions treatment, and detoxification treatment should be carried out in the same facilities where other counseling, inpatient, or outpatient rehabilitation is done. In its current form, the bill leaves the location of acupuncture detoxification practice ambiguous, and thus subject to misuse by being taken out of context of proper rehabilitation, thus harming patient outcomes. It is our belief that adding this clarification to the bill would not restrict the use of acupuncture detoxification in any useful way. Rather, it clarifies the intention that this kind of treatment is meant to be part of a multi-pronged approach to care.
- 2. Strike peer counselor and recovery coach from the list of qualified applicants (lines 27 & 28 of the bill).** Most other states allowing for acupuncture detoxification specialists require their specialists to practice in approved facilities, to have readily available contact with a supervising acupuncturist or medical provider, or to be licensed medical providers themselves. This is done because the medical provider or approved facility's malpractice insurance policy is often used to cover any mistakes made by the specialist. As this bill does not enforce such a collection of requirements, it may be impossible for specialists to get malpractice coverage unless they are existing medical providers. So, we strongly urge that only licensed healthcare providers be able to be certified in acupuncture detoxification, and this should be reflected in the bill's wording. To allow peer counselors and recovery coaches to practice acupuncture detoxification in an unsupervised capacity presents an unacceptable risk to the public.
- 3. Strike behavioral health applications, mental health, disaster and emotional trauma from the scope of use for acupuncture detoxification (leaving only addictions, lines 31 & 32).** Acupuncture detoxification programs are primarily intended as a complementary therapy for the treatment of addiction. Allowing their use for other purposes would require specialized education in mental or behavioral health and should be left to those professionals. We do not oppose the use of licensed mental health professionals who are also certified in acupuncture detoxification using the NADA protocol in appropriately supervised settings, but the current wording of the bill cannot enforce this situation and allows for misuse. And because the purpose of this bill is to allow for specialists to work in addiction recovery, the bill text should

be clear about that purpose.

We strongly recommend the inclusion of these amendments to close loopholes for improper or risky practice of acupuncture detoxification, so that this kind of treatment may be put to its best use in this time of crisis.

Warm regards,  
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President  
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