



California  
State  
Oriental  
Medical  
Association

April 16th, 2019

California Acupuncture Board  
1747 North Market Blvd., Suite 180  
Sacramento, CA 95834

Dear California Acupuncture Board;

The California State Oriental Medical Association (CSOMA), is writing to inform you of our concerns and objections to the Athletic Trainers Bill (AB 1592), as amended in assembly March 28, 2019.

Our first objection is to the omission of the practice of Acupuncture in section 2697.14 which outlines the exclusions of practice to Athletic Trainers in the state of California. We believe this permits the proposed ***Athletic Training Practice Act*** to permit, at a later date and through future amendment, the practice of Acupuncture by Athletic Trainers of California under the guise of “Dry Needling” techniques.

Our second objection is in regards to the wording of section 2697.12 (a) which outlines the Scope of Practice for Athletic Trainers. Within these sections 2697.12(a)(3) and 2697.12(a)(4) states that an Athletic Trainer can provide “***immediate care of an injury***” and “***rehabilitation and reconditioning from an injury sustained or exacerbated while participating in athletic activity....***”

CSOMA believes that along with the previous stated omission of the Practice of Acupuncture in the exclusion section of the Bill AB1592, 2697.12a Scope of Practice

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California State Oriental Medical Association (CSOMA) PO Box 7775 #68552 San Francisco, CA 94120

p/f: (800) 477-4564 e: [info@csomaonline.org](mailto:info@csomaonline.org) w: [csomaonline.org](http://csomaonline.org)

section will permit Athletic Trainers to practice Acupuncture directly on patients without referral to a Licensed Acupuncturist.

Our third objection regards the section of the proposed amended bill 2697.12(d):

***(d) An athletic trainer shall not provide, offer to provide, or represent that they are qualified to provide any treatment that they are not qualified to perform by their professional education or advanced post professional study or does not fall within the scope of practice of athletic training.***

CSOMA strongly believes that this section does not go far enough to protect the safe practice of Acupuncture in California. With the aforementioned exclusion of the Practice of Acupuncture in the section 2697.14, we believe this current wording will permit the future practice of Acupuncture by Athletic Trainers. CSOMA strongly objects to AB 1592 as currently written and amended on March 28, 2019, as it represents a potential public safety danger to Californians by persons practicing Acupuncture (aka Dry Needling), which are grossly undertrained to administer Acupuncture safely and effectively. As you know, Licensed Acupuncturists are required to spend up to 950 hours of direct and supervised training under accredited educational programs for the safe and effective administration of Acupuncture to patients.

CSOMA is requesting that the California Acupuncture Board strongly object to the current wording and omissions contained within AB 1592 on the basis of the lack of protections to the public safety in regard to the Licensed Practice of Acupuncture in California. In addition, CSOMA is requesting that the California Acupuncture Board, as a Professional Board under the Department of Consumer Affairs, Business and Professional Committee make these concerns known to the Business & Professional Committee as it undergoes the Amending of the Business and Professional Code of California.

Sincerely,

California State Oriental Medical Association

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