

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Letter of Testimony for Texas Medical Board  
**Date:** Thursday, December 15, 2016 8:06:00 AM

---

**From:** John Finnell [mailto:jfinnell@aoma.edu]  
**Sent:** Wednesday, December 14, 2016 5:11 PM  
**To:** Sunset Advisory Commission  
**Subject:** Letter of Testimony for Texas Medical Board

Attention Texas Sunset Commission Members:

My name is John S Finnell, ND, MPH, LAc. I hold a doctorate in naturopathic medicine, a master of science in acupuncture and Oriental medicine and a master of public health in epidemiology and environmental engineering. I am a native north Texan, but call Austin home. I serve as the Director of the Postgraduate Doctorate in Acupuncture and Oriental Medicine (DAOM) at AOMA Graduate School of Integrative Medicine, a regionally accredited institution of higher education located here in Austin, Texas. AOMA is a Level V, Southern Association of Colleges and Schools Council of Colleges regionally accredited institution, which is the same level as Baylor College of Medicine. The Accreditation Commission for Acupuncture and Oriental Medicine, recognized by the U.S. Department of Education, acts as our professional accreditor. The masters' in acupuncture and Oriental medicine is the terminal degree in the field for licensure; our field also offers doctoral degrees in acupuncture and Oriental medicine. Texas currently has three schools offering training in the field.

As you are aware, the scope of practice for a licensed acupuncturist includes the treatment of the nonsurgical, nonincisive insertion of an acupuncture needle and the application of moxibustion to specific areas of the human body as a primary mode of therapy to treat and mitigate a human condition, including evaluation and assessment of the condition; and the administration of thermal or electrical treatments or the recommendation of dietary guidelines, energy flow exercise, or dietary or herbal supplements in conjunction with the treatment.

It has been brought to my attention that other licensed providers also perform therapeutic needling, also known as "dry needling," without the commensurate training required for licensure as an acupuncturist in the State of Texas. The Texas State Board of Acupuncture Examiners, in their review of qualified acupuncturist licensees, may require that applicants for an acupuncture license who have not been in active practice for one of the prior two years undergo up to 6 months of supervised clinical practice, prior to receiving their license. However, no such requirement for didactic or supervised clinical training exists currently for licensed chiropractors or physical therapists to practice acupuncture or "dry needling." Indeed, there is little, or no, acupuncture training required by their professional accreditors or included in their training in the DC or DPT professional programs.

It should not be overlooked that licensed acupuncturists provide evidence-based, non-pharmacological (and non-opiate) approaches to treating the human condition. It is time for acupuncturists to play a larger role in the prevention of disease in Texas. Our citizens call for and deserve safe and effective healthcare options for stress reduction, wellness and health promotion, as a first line preventative therapy. An acupuncturist by any other name may not paint a rosy picture for Texans.

The State of Texas and the Sunset Commission operate in the best interest of the public

health. I sincerely appreciate your time and thoughtful review of the healthcare practices and the promotion of public health in my home state.

Respectfully,

**John S. Finnell, ND, MPH, LAc**  
Director, Doctoral Program and Research  
AOMA Graduate School of Integrative Medicine  
4701 West Gate Blvd.  
Austin, TX 78745  
[jfinnell@aoma.edu](mailto:jfinnell@aoma.edu)  
512.492-3057  
[www.aoma.edu](http://www.aoma.edu)

[Twitter @aoma\\_austin](#)  
[AOMA Facebook](#)  
[AOMA LinkedIn](#)



**Transforming Lives and Communities through  
Graduate Education in Oriental Medicine.**

This message, including attachments, contains confidential information and is intended only for the individual(s) named. Any use by others is strictly prohibited. Do not disseminate, distribute or copy this email without permission. Please notify the sender immediately by email if you have received this email by mistake, and delete this email from your system.