



Minnesota Acupuncture Association  
7809 Southtown Center Suite #287  
Bloomington, MN 55431

February 18, 2022

RE: HF 3240 Physical Therapy Direct Access Bill

Dear Committee Member:

As the President of the Minnesota Acupuncture Association (MAA) I am reaching out on behalf of the board of directors and Licensed Acupuncture members across the state of Minnesota. The MAA would like to express concerns regarding HF3240. The proposal to remove the current 90 day treatment requirement from statute raises significant issues of patient safety due to the education, and qualification to perform diagnostic services required for patient care.

Like other MN Licensed Providers, MD's, Dentists, Optometrists, Chiropractors, Podiatrists, and nurses, Licensed Acupuncturists are authorized to diagnose and treat ailments, injuries and medical conditions of the human body according to state statute. This is based on the extensive education and training of these providers. However, MN law does not allow such authority to physical therapists but rather they are authorized, according to educational standards to perform physical therapy assessments and evaluations based on existing diagnosis. Allowing for unlimited, direct access could lead to delays of critical care and potential harm to patients that have not been examined by a licensed provider prior to treatment. The following are 2 examples:

- 1) A patient may have an underlying or newly forming neurological disorder that requires proper diagnosis and management. While interventions of manual therapies like physical therapy may be warranted in these types of conditions. The complications that can arise from mismanagement could result in further or permanent damage to the patient's health as well as increased and avoidable costs to the healthcare system.
- 2) A patient could have a complex pain syndrome/sympathetic dystrophy syndrome. This is a condition that is difficult to diagnose. If this condition is not properly diagnosed, a delay in treatment, which would be devastating to a patient resulting in chronic pain and permanent disability

Thank you for this opportunity to express the MAA's concerns with the proposed legislation. Please oppose HF3240.

Respectfully,

A handwritten signature in black ink, appearing to read "Nicholas Dougherty".

Dr. Nicholas Dougherty, DAOM, Dipl. Ac (NCCAOM), L.Ac  
President, Minnesota Acupuncture Association (MAA)