



**State of Arizona Acupuncture Board of Examiners**  
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**Substantive Policy Statement**

**Board's Interpretation of "Acupuncture" Definition in A.R.S. § 32-3901(1)**

**April 24, 2019**

This Substantive Policy Statement is advisory only. A Substantive Policy Statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on the regulated parties or include confidential information or rules made in accordance with the Arizona Administrative Procedures Act. If you believe that this Substantive Policy Statement does impose additional requirements or penalties on regulated parties, you may petition the agency under Arizona Revised Statutes ("A.R.S.") Section 41-1033 for a review of the statement. (A.R.S. § 41-1091)

A.R.S. § 32-3901(1) defines "Acupuncture" as the "puncturing of the skin by thin, solid needles to reach subcutaneous structures, stimulating the needles to produce a positive therapeutic response at a distant site and the use of adjunctive therapies." The State of Arizona Acupuncture Board of Examiners ("Board") has interpreted "stimulating the needles" to include the removal of needles from a patient, as the removal of the needles is an integral part of an acupuncturist's education and training, the patient's treatment plan, and therapeutic effect.

A.R.S. § 32-3924(2) requires every applicant for licensure to provide evidence that he or she has graduated from or completed training in a board-approved program of acupuncture with a minimum of one thousand eight-hundred fifty hours of training that includes at least eight hundred hours of board-approved clinical training. Board-approved programs of acupuncture spend a significant amount of time teaching students about the risks and complications associated with acupuncture and the removal of needles: specifically, preventing bruising and bleeding post needle removal and what to do with stuck, broken needles, or missed needles, as well as what to do in the event a medical emergency arises during or after treatment. In light of the possibility that unlicensed and unqualified individuals may be removing needles from patients at the direction and without the supervision of a licensed acupuncturist, the Board has decided to clarify that it views removal of needles as "stimulation" of a needle and a practice exclusively within the scope of practice of a licensed acupuncturist or individuals exempted from Board regulation pursuant to A.R.S. § 32-3921(B).

The Board will seek a statute and/or rule change to clarify the definition of “Acupuncture” to specifically include the removal of needles in a licensee’s scope of practice. While the Board seeks this change to clarify its position, the Board will continue to recognize removal of needles as practicing acupuncture in the State of Arizona under its current law. Only individuals licensed by this Board and exempt pursuant to A.R.S. § 32-3921(B) are authorized to remove needles from patients being treated with acupuncture. Any unlicensed persons removing needles without a license, certificate, or statutory exemption may be subject to legal action pursuant to A.R.S. § 32-3953 and any licensed acupuncturist directing or supervising an unlicensed person in the removal of needles may also be subject to discipline by the Board for unprofessional conduct.