

STATE OF RHODE ISLAND



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March 5, 2024

The Honorable Susan R. Donovan, Chair
House Committee on Health and Human Services
State House
Providence, RI 02903

RE: 2024 – H 7626 – An Act Relating To Businesses And Professions – The Practice Of Acupuncture And Chinese Medicine

Dear Chair Donovan:

I write to express concern regarding H 7626 which would broaden the definition of a “qualified individual” in acupuncture and Chinese medicine to include any person trained and certified in auricular acudetox.

According to the certifying organization, the National Acupuncture Detox Association (NADA), “auricular acudetox,” also known as “5 Needle Protocol,” “5NP,” or “NADA protocol” means a standardized point auricular acupuncture protocol, consisting of five (5) points: Sympathetic, Shen Men, Liver, Kidney, and Lung, and developed by the National Acupuncture Detox Association (NADA) as an adjunct therapy for the treatment of addiction, substance use disorder, mental and behavioral health, trauma, and for relief in disaster settings.

Current statute recognizes that auricular acudetox is intended to be utilized in a behavioral health focused treatment setting and defines a qualified practitioner as a licensed nurse, a clinical social worker, a mental health counselor, a certified peer recovery specialist, or a certified alcohol or chemical dependency professional. H 7626 would remove these requirements and permit any person who was trained and certified by NADA to practice auricular acudetox with minimal supervision provided by a licensed acupuncturist.

According to a 2016 report published by the National Institutes of Health ([sar-7-169.pdf \(nih.gov\)](#)), auricular acupuncture may have some degree of effectiveness if administered in conjunction with other evidence-based practices such as medication and psychosocial therapies. By loosening current qualification requirements, the nexus to behavioral health-focused treatment is lost and there is no mechanism in place to ensure that persons with behavioral health disorders are receiving appropriate, evidence-based therapies in addition to the auricular acudetox.

Thank you for the opportunity to comment on this legislation.

Sincerely,

A handwritten signature in cursive script that reads "Louis A. Cerbo".

Louis A. Cerbo, Ed.D.
Interim Director

cc: **The Honorable Members of the House Committee on Health & Human Services**
 The Honorable David A. Bennett
 Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker of the House
 Lynne Urbani, Director of House Policy