

## Vermont Acupuncture Association Comments on OPR Bill

**From:** Deirdre Kelley <president@vtaa.org>

**Sent:** Wednesday, February 3, 2021 12:23 PM

**To:** Sarah Copeland Hanzas <SCopelandHanzas@leg.state.vt.us>

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**Subject:** [External] Vermont Acupuncture Association Comments on OPR Bill

[External]

Dear Chair Copeland-Hanzas and Vice-Chair Gannon:

On behalf of the Vermont Association of Acupuncture, I am writing to let you and your committee members know that our organization supports OPR's proposed change to the acupuncture licensing statute in Sec. 7 of the draft OPR bill (draft 2.2). The proposed change strikes the requirement in 26 VSA §3406(a)(7) that the acupuncture licensure examination include "Chinese herbology" as one of the examination's subject matters.

We understand that the purpose of striking the language in 26 VSA §3406(a)(7) is to avoid any potential for confusion. Vermont currently does not offer any kind of herbology specialty designation. Consequently, whether an acupuncturist passes the exam or not does not change their legal scope of practice.

Like all aspects of the scope of practice, a provider can only do those things for which they are properly trained. The acupuncture scope of practice includes the use of herbal therapies. However, if a provider is not trained to administer or prescribe herbal therapies than they should not provide such treatment.

Please reach out if you have any questions.

Thank-you,

Deirdre Kelley Lic Ac. Dipl Ac.

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