



Oregon Medical Board

omb.oregon.gov

971-673-2700

Acupuncture Workgroup

Point Injection Therapy Workgroup

October 15, 2026, 12:00PM

Videoconference

[Join ZoomGov Meeting](#)

Meeting ID: 165 941 1508

Passcode: @uVS*?yNc5

Phone: 669-254-5252

Meeting ID: 165 941 1508

Passcode: @uVS*?yNc5

The public is invited to attend all portions of this meeting and may participate by providing comment during the public comment period (item #4).

1. Call to Order and Roll Call (12:00-12:10PM)

Workgroup Members:

Lisa Tongel, LAc, OMB Acupuncture Advisory Committee, **Workgroup Chair**

Dongcheng Li, LAc, OMB Acupuncture Advisory Committee

William Duarte, DAOM, L.Ac, Acupuncture Educator

Jasmine Patel, MS, LAc, Practicing Acupuncturist

Christina Lambert, LAc, Practicing Acupuncturist

Julia Walls, DACM, MS, MAcOM, LAc, Practicing Acupuncturist

Meeting overview:

- The workgroup's role is advisory, and consensus is not necessary. Members provide input and advice from their respective areas of expertise. While the workgroup may make recommendations, the Oregon Medical Board retains decision making authority.
- This workgroup has been formed to gather input to evaluate and provide a recommendation on inclusion of point injection therapy within the acupuncture scope of practice and any additional qualifications or requirements for an acupuncturist to provide point injection therapy. If applicable, also provide draft rule language for consideration. Not a voting or decision-making body, the OMB retains decision making authority.
- Open, honest, and respectful communication is expected at all times. Members participate in a personal or organizational capacity and do not speak for the OMB.
- This is a public meeting, and all portions will be held in public session and recorded.
- The public is invited to attend the meeting and may provide comment during the designated comment period. Members of the public will otherwise be muted.

2. Introductions (Workgroup Members) & Charter Review (12:10-12:30PM)

3. Point Injection Therapy Request Discussion (12:30-1:20PM)

4. Public Comment (1:20-1:40PM)

We welcome public feedback. Any member of the public may provide comments at this time. OMB staff will call on public participants may raise their hand to indicate the desire to comment. Please limit comments to three (3) minutes and state your name and organization (if applicable). Additional written comments may be submitted to elizabeth.ross@omb.oregon.gov.

5. Closing Discussion (1:40-2:00PM)

- Workgroup members may provide closing thoughts and summary of the discussion.
- Workgroup members and the public may submit additional written comments to Elizabeth Ross, elizabeth.ross@omb.oregon.gov.
- Updates will be posted on the [workgroup's website](#).
- Next Workgroup Meeting: Thursday, November 5, 2026, 12-2PM

Materials: The materials below are provided as a starting point for discussion to facilitate meaningful dialogue among Workgroup members and public comment.

Agenda Subject to Change: So that the Workgroup makes the best use of meeting time, agenda items may be reviewed out of order. The agenda is subject to change without additional notification. Posted times are provided as an estimate.

Questions about the workgroup, email Elizabeth Ross, Legislative & Policy Analyst, elizabeth.ross@omb.oregon.gov.

For information on attending meetings or to request accommodations, contact Gretchen Kingham, Executive Assistant, gretchen.kingham@omb.oregon.gov or 971-673-2700.

Point Injection Therapy Workgroup Charter

Purpose

To evaluate and provide a recommendation on inclusion of point injection therapy within the acupuncture scope of practice and any additional qualifications or requirements for an acupuncturist to provide point injection therapy. If applicable, also provide draft rule language for consideration.

Members

The Workgroup will include persons with subject matter expertise and individuals who will likely be affected by the proposed rules. OMB staff will ensure the Workgroup includes a diversity of experiences and perspectives. Administrative support will be provided by OMB staff. The Workgroup may consist of:

- 1-2 members of the OMB's Acupuncture Advisory Committee
- 1 representative of the Oregon Association of Acupuncturists
- 2-3 practicing acupuncturists
- 1 acupuncture educator
- 1 consumer member who is not an acupuncturist

Scope

The Workgroup will review materials, discuss, and draft rule language (if applicable). The Workgroup is advisory, and consensus is not necessary; the Oregon Medical Board retains final decision-making authority.

Meetings

Public meetings will be held in late Summer and Fall 2026. Meetings will be subject to public meetings law, including public notice, public records, and public access. The meetings will be held via Zoom. Dates and times are subject to change.

Objective

The Workgroup recommendation(s) and any draft rules will be reviewed by the OMB's Acupuncture Advisory Committee in December 2026, and at Oregon Medical Board meeting in January 2027.

3. Point Injection Therapy Request Discussion (12:30-1:20PM)

In June 2026, the Oregon Medical Board’s Acupuncture Advisory Committee reviewed a request from the Oregon Association of Acupuncturists to include Point Injection Therapy (PIT) within the scope of practice for acupuncturists in Oregon.

During its review, the Committee noted that PIT is supported by the National Certification Board for Acupuncture and Herbal Medicine (NCBAHM), which offers a certification program and examination, and that several states, now include PIT in the acupuncture scope of practice. Approved substances vary by state, and may include saline, sterile water, vitamins, minerals, homeopathic substances, botanical extracts, and other non-controlled substances. Committee members expressed a desire for a clear definition of permissible injectable substances to address concerns about sterility, sourcing, single-use versus multi-use vials, preservatives, and risk of contamination, as well as the importance of knowing precisely what botanical extracts contain. The Committee recommended forming a workgroup to examine the topic further.

The Workgroup has been asked to:

- Evaluate whether PIT should be included within the acupuncture scope of practice,
- Identify any additional qualifications or requirements for acupuncturists to provide PIT,
- If applicable, provide draft rule language for the Board’s consideration.

OMB Acupuncture Scope of Practice

The acupuncture scope of practice is defined in ORS 677.757(1), “Acupuncture” means:

- (a) Traditional Eastern medicine used to promote health and treat neurological, organic or functional disorders through the insertion of needles into specific points on the body at varying depths, including insertion into the skin, subcutaneous tissue, muscle layers and fascia, and into or near joint spaces based on anatomical location and the practitioner’s clinical assessment. The type of needle inserted, and the depth, angle and technique of insertion, **are informed by specialized training in acupuncture theory, biomedical anatomy and diagnostic evaluation to safely stimulate biological and physiological responses** and support the body’s healing process.
- (b) **The treatment method of moxibustion and the use of electrical, thermal, mechanical or magnetic devices, with or without needles, to stimulate acupuncture points and acupuncture meridians and to induce acupuncture anesthesia or analgesia.**
- (c) The following modalities, as authorized by the Oregon Medical Board:
 - A. Traditional Eastern medicine and acupuncture techniques of diagnosis and evaluation;

- B. Traditional Eastern medicine manual therapy, exercise and related therapeutic methods; and
- C. The use of Traditional Eastern medicine pharmacopoeia, vitamins, minerals and dietary advice.

(2) “Traditional Eastern medicine pharmacopoeia” means a list of herbs described in Traditional Eastern medicine texts commonly used in accredited schools of Traditional Eastern medicine if the texts are approved by the Oregon Medical Board.

NCBAHM Education Requirements

The National Certification Board for Acupuncture and Herbal Medicine (NCBAHM) offers a Certificate of Qualification for Acupuncture Injection Therapy. To receive the certificate, an acupuncturist must complete approved courses with a minimum of 40 hours in acupuncture injection therapy coursework including a minimum of 16 hours of supervised practice. After which, they must pass the final examination and assessment. Attached below is the NCBAHM Acupuncture Injection Therapy Certificate of Qualification (AIT COQ) Frequently Asked Questions.

Other States’ PIT Education Requirements

Requirements for acupuncturists to perform PIT vary by state. Attached below are the requirements for Colorado, Maryland, Nevada, and Washington who impose additional training requirements. For these states, required hours range from no set minimum (Colorado, which instead specifies required topics) to 60 hours.

Discussion Items

These questions are only intended to help start the conversation.

- Is point injection therapy (PIT) within the acupuncture scope of practice in Oregon?
- What are the patient safety risks, and how can they be reduced?
- Should acupuncturists need extra training or qualifications before providing PIT?
- Should Oregon set a specific list of approved substances?

Colorado: 4 CCR 738-1.10 – Injection Therapy

A. Definitions. For purposes of this Rule only:

1. The Director recognizes that "Injection therapy" is the stimulation of acupuncture points, including trigger points(historically known as "AHSI" points), by the injection of saline, sterile herbs, vitamins, minerals, homeopathic substances, glucose, lidocaine, procaine, and sarapin, or other similar substances specifically manufactured for nonintravenous injection by means of hypodermic needles.

B. Except as restricted by paragraph (C) of this Rule, an acupuncturist with an active license may practice injection therapy in the treatment of patients in his or her care,

C. Requirements to Practice Injection Therapy. The acupuncturist shall:

1. Possess a Colorado acupuncture license in good standing;
2. Hold a current Clean Needle Technique Certificate through the NCCAOM (or successor organization); and
3. Be current in basic life support (BLS) or cardiopulmonary resuscitation (CPR) approved by the American Heart Association or American Red Cross;
4. Complete educational coursework covered in subsection D.

D. Acupuncturists employing injection therapy shall use only those substances and techniques for which they have received training. Required Educational Coursework shall include:

1. Anatomy and Physiology;
2. Acupuncture physical exam and differential diagnosis;
3. Acupuncture point location, including underlying anatomy;
4. Acupuncture needling technique;
5. General injection safety;
6. Acupuncture point injection therapy;
7. Pharmacology; and
8. Clean Needle Technique.
9. For the use of injectable substances prepared from sterile herbs, completion of training in Chinese herbology and injection of Chinese herbal injectables is required.
To demonstrate satisfying the training requirements in Chinese herbology and injection of Chinese herbal injectables the Director will accept NCCAOM, or a successor organization's, certification in Chinese herbology and/or certification in Oriental Medicine.
10. For the use of substances listed in (E)(3)(a)(12-17), instruction on the use of inhaled O2 and IM epinephrine for emergency use is required.

E. Permissible Substances

1. An acupuncturist shall comply with all federal and state laws that pertain to obtaining, possessing and administering any drug;
2. A substance shall only be approved for use if procured in compliance with all federal and state laws;
3. The following drugs are authorized in the modes of administration that are specified except as limited or restricted by federal or state law:

- a. Permissible substances that an acupuncturist may obtain for injection therapy as permitted per section 12-200-103(4), C.R.S and as permitted by the Director:
 - (1) Dextrose;
 - (2) d-glucose;
 - (3) Enzymes except urokinase;
 - (4) Glucose;
 - (4) Homeopathic Substances (to only include those that are within the US Pharmacopia);
 - (5) Hyaluronic Acid;
 - (6) Minerals;
 - (7) Saline;
 - (8) Sarapin;
 - (9) Sodium chloride;
 - (9) Sterile water;
 - (10) Traumeel;
 - (11) Vitamins;
 - (12) Cyanocobalamin;
 - (13) Lidocaine;
 - (14) Marcaine (Bupivacaine Hydrochloride) with or without epinephrine;
 - (15) Sterile Herbs;
 - (16) Procaine; and
 - (17) Vitamin B-12.

F. Patient safety.

1. Acupuncturists shall have an adverse event/emergency plan in place.
2. An acupuncturist practicing injection therapy of substances listed in (E)(3)(a)(12)-(17) shall be equipped and trained to treat patients with oxygen and epinephrine. The oxygen and emergency epinephrine kit shall be on site where injection therapy utilizing substances with potential allergic side effects are being rendered.
3. An acupuncturist authorized to practice injection therapy shall not inject any substance intravenously.

G. Acupuncturists shall show current medical malpractice coverage for this procedure and maintain coverage.

1. It is the acupuncturist's responsibility to only inject substances that are listed in subsection E and are explicitly covered by the acupuncturist's insurance policy obtained in compliance with section 12-200-106(6), C.R.S.

Nevada: NRS 634A.142: Endorsement to practice acupuncture point injection therapy

1. A doctor of Oriental medicine licensed pursuant to this chapter may apply to the Board for an endorsement to practice acupuncture point injection therapy. The applicant must submit with his or her application proof that the applicant has:

- (a) Successfully completed postgraduate coursework approved by the National Certification Commission for Acupuncture and Oriental Medicine or a successor organization which provides at least 24 hours of instruction provided in person,

- including, without limitation, at least 8 hours of instruction received by practicum and 2 hours of training in the administration of intramuscular epinephrine; and
- (b) Obtained or otherwise carries a policy of professional liability insurance which insures the applicant against any liability arising from the provision of acupuncture point injection therapy by the applicant.
2. The Board shall issue an endorsement to practice acupuncture point injection therapy to an applicant who meets the requirements of subsection 1.
3. A licensee who is issued an endorsement to practice acupuncture point injection therapy may only inject substances for which the licensee has received training which may include, without limitation, nutritional, homeopathic and herbal substances.
4. As used in this section, “acupuncture point injection therapy” means the subcutaneous, intramuscular and intradermal injection of substances to stimulate acupuncture points, ashi points and trigger points to relieve pain and prevent illness.

Maryland: COMAR 10.26.02.08 (Acupoint Injection Therapy – Registration)

A. Registration. To obtain the required registration from the Board as qualified to practice acupoint injection therapy, an applicant shall:

- (1) Possess an active license in good standing to practice acupuncture and East Asian medicine in the State;
- (2) Successfully complete an NCCAOM, or other appropriate accreditation body endorsed specialty training program and assessment in acupoint injection therapy that consists of at least 60 hours including:
 - (a) A minimum of 40 hours of theoretical training in the required topics;
 - (b) A minimum of 20 hours of live face-to-face clinical practical experience; and
 - (c) Instruction that meets the requirements of [§C of this regulation](#);
- (3) Possess a current certification by the American Heart Association or approved equivalent in basic life support;
- (4) Hold a current Clean Needle Technique Certificate through CCAHM or NCCAOM;
- (5) If licensed in the State for less than 2 years, possess a valid license in good standing to practice acupuncture and East Asian medicine, in any state, for at least 2 years before applying to perform acupoint injection therapy in the State; and
- (6) Complete and submit an application in the format provided by the Board.

B. The Board shall accept the documentation from a licensee that has completed the training required to perform acupoint injection therapy prior to the effective date of this regulation if:

- (1) The licensee provides a certificate, or other valid documentation, confirming successful completion of 60 hours of acupoint injection therapy training that complies with this regulation; or
- (2) The previously completed training does not meet the requirements of this regulation, but the licensee provides documentation of completion of supplemental training that, together with the initial training, fulfills the coursework requirements of [§C of this regulation](#).

C. Training Program Curriculum. The curriculum for the acupoint injection therapy program shall include:

- (1) 20 hours of clinical practice on a patient or patients;

- (2) History and development of acupuncture injection therapy;
- (3) Differential diagnosis;
- (4) Definitions, concepts, and pathophysiology;
- (5) The nature, function, channels entered, and contraindications of the substances stated in [§F\(2\) of this regulation](#);
- (6) Diseases amenable to treatment with acupuncture injection therapy and the substances appropriate to treat them;
- (7) Identification of appropriate points for treatment, including palpatory diagnosis;
- (8) A review of physical examination, anatomy, and referral zones;
- (9) Universal precautions including management of blood borne pathogens and hazardous waste;
- (10) Procedures for injections, including preparing the substances, contraindications, and precautions;
- (11) Administration techniques and equipment required;
- (12) Administration of the prepackaged substances authorized for acupoint injection therapy, including aseptic technique, recordkeeping and storage of substances prepared and authorized for use in acupoint injection therapy;
- (13) Safety and emergency procedures; and
- (14) 2 hours of training in the use of intramuscular epinephrine and emergency oxygen which count toward the required theoretical and clinical training hours.

D. Clinical Instructors. In addition to the requirements of NCCAOM, or other appropriate accreditation body, an instructor for acupoint injection therapy shall:

- (1) Ensure that the curriculum meets the training requirements set forth under §C of this regulation;
- (2) Be a licensed practitioner in acupuncture in good standing in the State and be registered to practice acupoint injection therapy in the State;
- (3) Possess at least 5 years of experience in the practice of acupuncture that includes acupoint injection therapy;
- (4) Retain proof of compliance as set forth under this section for as long as they provide acupoint injection therapy training; and
- (5) Provide proof of compliance to the Board upon request.

E. Training Programs. All training programs shall provide each successful student with:

- (1) A certificate of successful completion of the program;
- (2) A course syllabus outlining the schedule and curriculum of the program; and
- (3) Testing requirements and the performance measure for successful completion.

F. Practice.

- (1) To practice acupoint injection therapy, the licensed acupuncturist shall:
 - (a) Possess a registration for acupoint injection therapy from the Board;
 - (b) Explain acupoint injection therapy to the patient in advance of treatment;
 - (c) Obtain written informed consent specific to acupoint injection therapy that shall be included in the patient's medical record;
 - (d) Only perform subcutaneous, intradermal, or intramuscular injection in accordance with the principles of acupuncture;

- (e) Have an adverse event or emergency plan in place for allergic reactions to injected substances;
 - (f) Maintain professional liability coverage for this procedure; and
 - (g) Only use prepackaged and sterile acupoint injectable therapeutic substances that are:
 - (i) Acquired from an appropriately licensed entity in compliance with federal and State law; and
 - (ii) Stored securely and in accordance with manufacturer's specifications.
- (2) In the practice of acupoint injection therapy, the licensed acupuncturist, provided they have been trained on utilization of the specific therapeutic substance, may only use the following therapeutic substances for acupoint injection therapy:
- (a) Sterile and bacteriostatic water;
 - (b) Saline solution;
 - (c) Alkalizing agents such as sodium bicarbonate;
 - (d) Nutritional or dietary substances;
 - (e) Vitamins and minerals including B-12, B-complex, C, cyanocobalamin, hydroxocobalamin, and methylcobalamin;
 - (f) Proteins, enzymes, and amino acids including methionine, choline, inositol, and glutathione;
 - (g) Sugars including dextrose and glucose;
 - (h) Ozone;
 - (i) Procaine and lidocaine;
 - (j) Herbal and botanical extracts including astragalus and Sarapin;
 - (k) Biological products including hyaluronic acid and epinephrine; and
 - (l) Homeopathic substances including Traumeel and Zeel.
- (3) A licensed acupuncturist in the practice of acupoint injection therapy may not:
- (a) Administer substances other than those specified under [§F\(2\) of this regulation](#);
 - (b) Administer substances that the licensed acupuncturist has not been appropriately trained in accordance with this regulation;
 - (c) Give an injectable substance to a patient for self-injection; or
 - (d) Administer intravenous injections.

[Washington: WAC 246-803-040 – Education and Training for point injection therapy](#)

Acupuncturist or acupuncture and Eastern medicine practitioners employing point injection therapy shall use only those substances and techniques for which they have received training.

- (1) The education and training for point injection therapy must:
- (a) Consist of a minimum total of 24 hours in the topics required in this section:
 - (i) Sixteen hours must be in-person; eight hours of which must be hands-on clinical practical experience; and
 - (ii) The remaining eight hours may be obtained through live interactive webinar or in-person.

(b) Be administered by an instructor that meets the requirements of subsection (3) of this section.

(2) A curriculum for a point injection therapy training program must include all of the following:

- (a) Review of physical examination, contraindications and universal precautions, and differential diagnosis;
- (b) Compounding and administration of the substances authorized for point injection therapy under WAC [246-803-030](#), including aseptic technique, recordkeeping and storage of substances authorized for use in point injection therapy;
- (c) Use of local anesthetics, such as lidocaine and procaine, for reduction of pain during point injection therapy, consistent with the practice of acupuncture and Eastern medicine;
- (d) Emergency procedures to include the use of oxygen and epinephrine for potential emergency purposes, such as an allergic or adverse reaction, for patient care and safety; and
- (e) Point injection therapy techniques and contraindication within the acupuncture or Eastern medicine scope of practice relative to the authorized substances listed in WAC [246-803-030](#) (13)(a)(i) through (vi).

(3) An instructor for point injection therapy must have:

- (a) A health care credential in good standing with a scope of practice that includes point injection therapy; and
- (b) At least five years of experience in a health care practice that includes point injection therapy.

(4) In addition to the requirements of subsections (1) and (2) of this section, an acupuncturist or acupuncture and Eastern medicine practitioners using point injection therapy must complete a minimum of two hours of training specifically in the use of intramuscular epinephrine, local anesthetics and oxygen.

- (a) The training may be taken separately from the training in point injection therapy.
- (b) The minimum of two hours of training count towards meeting the requirement for 24 hours of training as required in subsection (1)(a) of this section.
- (c) An acupuncturist or acupuncture and Eastern medicine practitioner who holds an active credential with a scope of practice that includes the authority to prescribe, dispense or administer epinephrine, local anesthetics, or oxygen does not need to meet the requirements of (a) of this subsection.

(5) To qualify under this section, the training program shall provide each successful student with a:

- (a) Certificate of successful completion of the program; and
- (b) Course syllabus outlining the schedule and curriculum of the program.

(6) The requirements of subsections (1) through (5) of this section do not apply to an acupuncturist or acupuncture and Eastern medicine practitioner who has provided point injection therapy prior to June 9, 2016. An acupuncturist or acupuncture and Eastern medicine practitioners using point injection therapy prior to June 9, 2016, must have completed training and education in point injection therapy.

- (7) Prior to administering local anesthetic, epinephrine, or oxygen in providing point injection therapy services, an acupuncturist or acupuncture and Eastern medicine practitioner must satisfy the education and training requirements under this section.
- (8) Any acupuncturist or acupuncture and Eastern medicine practitioner performing point injection therapy must be able to demonstrate, upon request of the department, successful completion of education and training in point injection therapy.

Utah R156-72-701. Injection Therapy - Training Requirements.

(1) Under Subsection 58-72-102(3) and Section 58-72-701, the education and training curriculum for an acupuncturist to provide injection therapy shall:

- (a) be approved by NCBAHM or ACAHM;
- (b) be at least 24 clock hours which shall include at least 16 hours of in-person, hands-on, clinical experience;
- (c) include the following areas:
 - (i) contraindications, indications, and universal precautions;
 - (ii) administration of substances authorized for point injection;
 - (iii) aseptic technique;
 - (iv) recordkeeping;
 - (v) storage; and
 - (vi) emergency procedures, including:
 - (A) responding to adverse reactions;
 - (B) administration of oxygen; and
 - (C) use of intramuscular epinephrine.

(2) An acupuncturist shall document completion of the education and training curriculum by obtaining a certification of completion from the course provider.

R156-72-702. Injection Therapy - Substances.

Under Subsection 58-72-102(3), a licensed acupuncturist who meets the qualifications to perform injection therapy required under Sections 58-72-701 and R156-72-701 may inject any of the following sterile substances in liquid form into acupuncture points on the body:

- (1) an herb;
- (2) a supplement;
- (3) a vitamin; or
- (4) a homeopathic product.

R156-72-702. Injection Therapy - Substances.

Under Subsection 58-72-102(3), a licensed acupuncturist who meets the qualifications to perform injection therapy required under Sections 58-72-701 and R156-72-701 may inject any of the following sterile substances in liquid form into acupuncture points on the body:

- (1) an herb;
- (2) a supplement;
- (3) a vitamin; or
- (4) a homeopathic product.



Acupuncture Advisory Review Request Form

Revised 12/2023

Please complete the following form to request review of an acupuncture practice topic for the Oregon Medical Board's Acupuncture Advisory Committee. Your proposal will be reviewed by OMB staff with assistance by the Committee's chair. If we have questions concerning the requested review, we will follow up with you for additional information.

You will receive confirmation of your request and whether the request will be reviewed by the Acupuncture Advisory Committee. Please note the Acupuncture Advisory Committee meets the first week in June and December. Requests should be submitted at least one month prior to a meeting for consideration.

Please provide as much information as you can to inform the review process, you may leave questions blank if not applicable or you do not know the answer.

1. What topic would you like the Acupuncture Advisory Committee to review? Please note any [acupuncture rules](#) that you are proposing be reviewed.

We would like to visit the topic of Point Injection Therapy (PIT) being included in the interpretation of point stimulation. What PIT Is: A localized, non-intravenous injection of limited, sterile substances into acupuncture or trigger points, performed by licensed acupuncturists with additional education and training.

2. Why is this review needed?

The National Certification Board for Acupuncture and Herbal Medicine has created a national certification for PIT. Several U.S. states regulate PIT through statute and/or board rule. Oregon currently does not. Clarifying regulatory treatment would improve safety, compliance, and enforcement.

3. What are the advantages or benefits? Is there a patient benefit?

Faster therapeutic effect (pain relief), prolonged therapeutic effect, increase circulation and tissue healing, neuromuscular reset, increased integrative flexibility with combining benefits of Eastern and Western medicine.

4. What are the disadvantages or risks? Is there potential for harm?

When performed by a properly trained and licensed provider:

Side effects are usually mild (temporary soreness, bruising)

Serious complications are rare

5. Who else might be affected by the review? How will they be affected?

This will affect Licensed Acupuncturists in Oregon only and the patients they treat.

6. Who might oppose the topic being reviewed? Why might they oppose it?

In other states there has not been much opposition to this. There have been questions that the pharmaceutical boards have brought up about procurement of substances (like Procaine and Lidocaine) that we are not able to prescribe federally (we do not hold DEA license) but can use in treatment. Procurement of substances is part of the national training around this.



Acupuncture Advisory Review Request Form

Revised 12/2023

7. Is this area currently being taught in acupuncture curriculum? Would an acupuncturist need additional training?

Training standards in school around this topic varies a lot. There is now a national training and certification for PIT that would need to be completed in order to guarantee patient safety around this.

8. What are the financial impacts?

Financial impacts to the OMB should be minimal if any- nationally we are not aware of any patient harm that has occurred from individuals with proper training.

9. How do other state licensing boards view this topic?

This varies a lot from state to state- we have a spreadsheet with every state who have PIT in their scope stating if this is in statute or administrative rulemaking. We will happily provide this.

10. What research or evidence is there on this topic? Include links or copies to research.

States that authorize PIT have not reported disproportionate increases in disciplinary actions related to the modality. Their regulatory focus remains on training, boundaries, and enforceability.

Request for review made by:

Amber Reding-Gazzini

Full Name

E-mail

Phone

Oregon Association of Acupuncturists

Organization (if applicable)

Street Address, City, State, Zip Code

E-mail request form to: shayne.nylund@omb.oregon.gov and elizabeth.ross@omb.oregon.gov

Submitted by the Oregon Association of Acupuncturists

PIT_Authorizing_States_Comparison_with_Citations_and_Safety - Jan 2026

State	Legal Mechanism	Primary Authority (Statute/Rule)	Primary Citation	Official / Reliable Source URL	High-Level Allowed Substances / Description	Key Limitations / Safeguards (High-Level)	Safety: Training / Certification / Education Requirements	Policy Notes (Oregon Relevance)
Washington	Statute Reference + Detailed Rule (WAC)	Rule defines point injection therapy and limits substances; companion rule sets education/training	WAC 246-803-030; WAC 246-803-040	https://app.leg.wa.gov/wac/default.aspx?cite=246-803-030 ; https://www.law.cornell.edu/regulations/washington/WAC-246-803-040	Limited substances (e.g., saline, sterile water, vitamins/minerals in liquid form, homeopathic/nutritional substances)	No controlled substances or steroids; training required; IV excluded; allows local anesthetics with training	Explicit minimum education/training in rule: WAC 246-803-040 sets PIT education and training requirements and documentation standards; WAC 246-803-030 limits substances and excludes IV/controlled substances.	Best model for Oregon rulemaking: explicit list + education standards + exclusions
Colorado	Statute + Rule	Statute includes injection therapy within acupuncture; rule defines injection therapy and lists substances	C.R.S. § 12-200-103(1)(I) (or prior recodification § 12-29.5-102); 4 CCR 738-1.10	https://law.justia.com/codes/colorado/title-12/health-care-professions-and-occupations/article-200/section-12-200-103/ ; https://www.law.cornell.edu/regulations/colorado/4-CCR-738-1.10	Rule-recognized injection therapy (e.g., saline, sterile herbs/vitamins/minerals/homeopathics, etc.)	No IV injection; training/competency; emergency plan requirements	Rule-based requirements: injection therapy permitted only under 4 CCR 738-1.10 (training/competency standards; documentation; IV injection prohibited).	Demonstrates statutory inclusion + detailed rule-based safeguards
Florida	Board Rule	Rule defines acupoint injection therapy as adjunctive therapy	Fla. Admin. Code R. 64B1-4.012	https://www.law.cornell.edu/regulations/florida/Fla-Admin-Code-Ann-R-64B1-4-012	Injection of herbs, homeopathics, and other nutritional supplements (sterile) into acupuncture points	IV therapy excluded	Board-rule modality with education requirement: practice contingent on documented injection-therapy education consistent with Rule 64B1-4.012 and board standards (commonly satisfied via formal coursework).	Clean model for Oregon: authorize by statute then define modality + exclusions in OMB rule
Maryland	Regulation (Registration Pathway)	Regulations establish registration to practice acupoint injection therapy	COMAR 10.26.02.08 (Acupoint Injection Therapy – Registration)	https://health.maryland.gov/regs/Documents/10.26.02%20and%2010.26.06.pdf	Board-approved specialty training program; registration required	Registration required; board maintains lists and standards	Registration pathway: practitioner must complete an approved acupoint injection therapy specialty training program and hold the applicable registration (COMAR).	Endorsement/registration pathway reduces ambiguity and supports auditing
Nevada	Statute (Endorsement)	Statute provides endorsement to practice acupuncture point injection therapy	NRS 634A.142	https://law.justia.com/codes/nevada/chapter-634a/statute-634a-142/	Endorsed practice of acupuncture point injection therapy	Endorsement + proof requirements; liability insurance referenced in related materials	Endorsement pathway: practitioner must obtain an acupuncture point injection therapy endorsement and meet board-specified education/training requirements (NRS 634A.142).	Good model for a defined endorsement within Oregon licensure
New Mexico	Statute + Rules (Expanded Practice)	Statute requires board to issue expanded practice certifications including injection therapy	NMSA 1978 § 61-14A-8.1; NMAC 16.2.19 (expanded practice certification provisions)	https://law.justia.com/codes/new-mexico/chapter-61/article-14a/section-61-14a-8-1/ ; https://www.law.cornell.edu/regulations/new-mexico/N-M-Admin-Code-SS-16.2.19.8	Expanded practice tiers include basic injection therapy/injection therapy (and separately IV therapy)	Advanced certification required; prescriptive authority framework	Expanded practice model: requires expanded practice certification(s) (e.g., basic injection therapy / injection therapy) with additional education and clinical training as defined by NMAC.	Broadest authority; higher policy/regulatory burden than FL/WA-style PIT
Utah	Statute	Statute defines injection therapy for licensed acupuncturists and lists permissible substances and anatomical limits	Utah Code § 58-72-102 (definition of injection therapy)	https://le.utah.gov/xcode/Title58/Chapter72/58-72-S102.html	Sterile substances in liquid form into acupuncture points (subcutaneous/intramuscular)	Explicit anatomic exclusions; requires clean needle technique certificate	Statutory prerequisites and limits: injection therapy defined in statute with anatomical limitations; requires Clean Needle Technique certification and practice within statutory substance/anatomy limits.	Strong safety-forward statutory drafting template

Proposed Oregon Administrative Rule

Acupuncture Injection Therapy (AIT) / Point Injection Therapy (PIT)

847-070-XXXX

Definitions

For purposes of this rule:

1. “Acupuncture Injection Therapy” or “AIT” means the stimulation of acupuncture points, trigger points, motor points, myofascial points, or other anatomically appropriate treatment sites through the administration of injectable substances using hypodermic needles consistent with acupuncture and East Asian medicine principles.
2. “Point Injection Therapy” or “PIT” means a form of Acupuncture Injection Therapy.
3. “Qualified Licensee” means an Oregon licensed acupuncturist who has met the education, training, and competency requirements established in this rule.
4. “Approved AIT Training Program” means an educational program that:
 - a. Meets the standards established by the National Acupuncture Injection Therapy Taskforce (NAITT); or
 - b. Is approved by the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM) or National Certification Board for Acupuncture and Herbal Medicine (NCBAHM) for the Acupuncture Injection Therapy Certificate of Qualification (AIT COQ); or
 - c. Is otherwise approved by the Board.
5. “Injectable Substances” means substances authorized under this rule that are within the training and competency of the licensee and permitted under Oregon law.

847-070-XXXX

Scope of Practice

1. Acupuncture Injection Therapy constitutes a form of acupuncture point stimulation within the practice of acupuncture in Oregon when performed by a Qualified Licensee.
2. A Qualified Licensee may perform Acupuncture Injection Therapy for therapeutic purposes consistent with acupuncture and East Asian medicine theory and training.

3. Acupuncture Injection Therapy may include:
 - a. Intradermal injections;
 - b. Subcutaneous injections;
 - c. Intramuscular injections;
 - d. Trigger point injections; and
 - e. Other injection techniques authorized through approved training.
 4. Acupuncture Injection Therapy shall not authorize:
 - a. Intravenous therapy;
 - b. Epidural injections;
 - c. Joint injections into synovial spaces;
 - d. Administration of controlled substances; or
 - e. Any practice otherwise prohibited by Oregon law.
-

847-070-XXXX

Qualification Requirements

1. Prior to performing Acupuncture Injection Therapy, a licensee shall:
 - a. Hold an active Oregon acupuncture license in good standing;
 - b. Maintain current CPR/BLS certification; and
 - c. Successfully complete an Approved AIT Training Program.
2. An Approved AIT Training Program must include:
 - a. A minimum of 40 hours of education;
 - b. At least 16 hours of supervised practical clinical application; and
 - c. Training in:
 - i. Injection safety and aseptic technique;
 - ii. OSHA bloodborne pathogen standards;
 - iii. Clean needle and injection procedures;
 - iv. Anatomy and contraindications;
 - v. Emergency response procedures;
 - vi. Adverse event recognition and management;
 - vii. Informed consent procedures;
 - viii. Pharmacology and injectable substance safety;
 - ix. Proper storage and handling of injectable substances;
 - x. Documentation standards; and
 - xi. Oregon laws and rules governing acupuncture practice.

3. The Board may recognize the successful completion of the NCCAOM or NCBAHM Acupuncture Injection Therapy Certificate of Qualification (AIT COQ) as evidence of competency.
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Authorized Injectable Substances

1. A Qualified Licensee may administer injectable substances that are:
 - a. Within the licensee's education and training;
 - b. Obtained lawfully; and
 - c. Appropriate for acupuncture injection therapy.
 2. Authorized substances may include:
 - a. Saline;
 - b. Sterile water;
 - c. Vitamins;
 - d. Minerals;
 - e. Homeopathic substances;
 - f. Botanical extracts; and
 - g. Other non-controlled substances approved by the Board.
 3. A licensee shall not administer:
 - a. Controlled substances;
 - b. Prescription anesthetics unless specifically authorized by Oregon law; or
 - c. Any substance for cosmetic purposes unless separately authorized.
-

847-070-XXXX

Professional Standards

1. A Qualified Licensee performing Acupuncture Injection Therapy shall:
 - a. Utilize universal precautions and aseptic technique;
 - b. Maintain compliance with OSHA bloodborne pathogen standards;
 - c. Maintain accurate treatment records;
 - d. Obtain informed consent specific to injection therapy;
 - e. Maintain professional liability insurance covering injection therapy procedures;and
 - f. Ensure appropriate emergency supplies are available onsite.

2. Documentation shall include:
 - a. Substance administered;
 - b. Dosage and amount;
 - c. Injection site;
 - d. Lot number and expiration date when applicable;
 - e. Patient response; and
 - f. Any adverse event or complication.
-

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Continuing Education

1. A Qualified Licensee shall complete at least eight hours of continuing education in Acupuncture Injection Therapy every two years.
 2. Continuing education must include:
 - a. Safety and infection control;
 - b. Emergency procedures; or
 - c. Clinical application and competency.
 3. Continuing education approved by NCCAOM, NCBAHM, or the Board satisfies this requirement.
-

847-070-XXXX

Unprofessional Conduct

Failure to comply with the requirements of this rule constitutes unprofessional conduct and may subject the licensee to disciplinary action.

Grounds for discipline include:

1. Performing AIT without required training;
2. Failure to maintain aseptic technique;
3. Administration of unauthorized substances;
4. Failure to obtain informed consent;
5. Failure to maintain required records; or
6. Practicing beyond the scope authorized under this rule.

ACUPUNCTURE INJECTION THERAPY CERTIFICATE OF QUALIFICATION GENERAL INFORMATION

Introducing the **NEW NCBAHM Acupuncture Injection Therapy (AIT) Certificate of Qualification (COQ)!**



- State-recognized, competency-based program
- Comprehensive, assessment-based Certificate of Qualification
- Designed to meet industry standards for Acupuncture Injection Therapy

The COQ program has been meticulously crafted by the ***National Acupuncture Injection Therapy Taskforce (NAITT)***, which is composed of numerous subject matter experts from all of the country, each boasting over two decades of experience in the Acupuncture Injection Therapy.

The NAITT has diligently developed the Course Learning Objectives (CLOs) for the AIT COQ Program to ensure it meets the highest standards of excellence. In order to enhance the rigor and validity of the assessment section, NAITT has sought the expertise of the National Certification Commission for Acupuncture and Herbal Medicine (NCBAHM). By partnering with NAITT, we are confident that this collaborative effort will significantly elevate the quality and recognition of the AIT COQ program.

This program is available to **licensed acupuncturists who have completed an NAITT-approved Acupuncture Injection Therapy (AIT) course after January 1, 2020** and wish to integrate injection therapy into their practice. Acupuncturists can find a list of NAITT-approved AIT courses under the 'Helpful Links' section.

Practitioners may proceed via the button below to purchase the assessment upon completion of an NAITT-approved AIT course. Upon successful passing of the assessment, practitioners will

Receive 40 PDA points, including Ethics and Safety requirements, as well as the NCBAHM AIT Certificate of Qualification (COQ) Digital Badge.

Topics Covered

- Acupuncture Injection Therapy
- Effective techniques, application, and aseptic procedures
- OSHA safety standards and precautions
- Treatment strategy and planning
- Injectable substances and best practices for storage
- Adverse reactions and emergency procedures
- Rules and regulations related to Injection Therapy

Please note: The Acupuncture Injection Therapy Certificate of Qualification (AIT COQ) is available to licensed acupuncturists who have completed an NAITT-approved AIT course after January 1, 2020.



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NCBAHM Acupuncture Injection Therapy Certificate of Qualification (AIT COQ) Frequently Asked Questions

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General Information

Q1: What is the NCBAHM Acupuncture Injection Therapy Certificate of Qualification (AIT COQ)?

A1: The NCBAHM Acupuncture Injection Therapy Certificate of Qualification (AIT COQ) is a specialized certificate that validates a practitioner's competence and expertise in performing acupuncture injection therapy (AIT) once they have passed the final assessment.

Q2: What is the National Acupuncture Injection Therapy Taskforce (NAITT)?

A2: The National Acupuncture Injection Therapy Taskforce (NAITT) comprises of subject matter experts (SMEs) from all over the country with each boasting over two decades of experience in AIT.

NAITT has diligently developed the Course Learning Objectives (CLOs) for the AIT COQ Program to ensure it meets the highest standards of excellence.

In order to enhance the rigor and validity of the assessment section, NAITT has sought the expertise of the National Certification Board for Acupuncture and Herbal Medicine (NCBAHM). By partnering with NAITT, we are confident that this collaborative effort will significantly elevate the quality and recognition of the AIT COQ program.

Q3: Why should I obtain the AIT COQ?

A3: Obtaining the AIT COQ demonstrates your commitment to advanced practice standards, increases your credibility, and may expand your scope of practice. It also assures patients and employers of your proficiency in acupuncture injection therapy.

Q4: Is a Certificate awarded?

A4: Yes, Candidates who pass the exam will be awarded:

- An electronic 8.5" x 11" wall certificate, which can be printed and framed by the candidate
- Digital badge: which can be used in digital marketing, including website, social media, and email communications

Q5: Can I complete the AIT COQ Program even though AIT is not in my state's scope of practice?

A5: You may complete the program and still earn the AIT COQ Certificate along with the Badge. However, practitioners may only practice modalities within your state's scope of practice. Be sure to verify with your local state regulatory board to see if your state includes AIT prior to registering for the program.



Q6: What is the scope of practice for AIT COQ holders?

A6: The scope of practice for AIT COQ holders includes performing acupuncture injection therapy with sterile substances approved for use. The specific substances and techniques permitted may vary by state or jurisdiction, so it is essential to check the regulations in your area.

Q7: Are there any legal considerations I should be aware of?

A7: Yes, it is important to be aware of the legal regulations governing acupuncture injection therapy in your state or jurisdiction. This may include obtaining additional permits or adhering to specific protocols. Always ensure you are in compliance with local laws and regulations. Check with your malpractice insurance carrier about coverage and liability.

Q8: What is the difference between a Certificate and Certification?

A8: Unlike the board exams, which lead to certification, the AIT COQ is a *certificate* program.

Certification Vs Certificate	
Certification	Certificate
<ul style="list-style-type: none">• Board Certified	<ul style="list-style-type: none">• Certificate holder
<ul style="list-style-type: none">• Includes credentials (e.g.: Dipl.Ac.) placed after your name	<ul style="list-style-type: none">• No credentials after your name
<ul style="list-style-type: none">• Used to assess the baseline knowledge, skills, and/or competencies previously acquired (i.e. in school) to obtain licensure	<ul style="list-style-type: none">• Provides training through a specific program of study in a specialized area
<ul style="list-style-type: none">• Assessment is broad in scope	<ul style="list-style-type: none">• Assessment is narrow in scope

Candidates who complete the AIT COQ:

Should	Should Not
☒ Refer to themselves as Acupuncture Injection Therapy Certificate Holders	☒ Refer to themselves as “certified”
☒ Display the AIT COQ badge and certificate	☒ List additional credentials

Eligibility, Education, and Application

Q9: Who is eligible for the AIT COQ?

A9: To be eligible for the AIT COQ, you must:



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- have an acupuncture license that is in good standing
AND
- meet the specific training and education requirements set by NAITT

A list of approved courses can be found under the Quick Links section of the [NCBAHM AIT COQ website](#).

Q10: What training is required for the AIT COQ?

A10: The required training includes a NAITT-approved course with a minimum of 40 hours in acupuncture injection therapy coursework, including at least 16 hours of supervised practice. The list of approved courses can be found on the [NCBAHM AIT COQ website](#).

Q11: How do I apply for the AIT COQ?

A11: You can apply for the AIT COQ through the [NCBAHM website](#). The application process involves:

1. Completing the required course work (a NAITT-approved course)
2. Purchasing the AIT COQ
3. Submitting your educational documentation, license, proof license is in good standing
4. Passing the AIT COQ examination

Examination

Q12: What does the AIT COQ examination entail?

A12: The AIT COQ examination assesses your knowledge and skills in acupuncture injection therapy. There is one-hour and forty-five minutes (1.75 hr.) allotted for seventy (70) multiple choice questions that must be completed at a PearsonVue testing center.

It is administered in a secure, computer-based format at Pearson VUE testing centers, which operate over 200 locations throughout the United States. The exam evaluates your understanding of theoretical principles as well as your ability to apply safe and effective injection techniques in clinical practice. The examination is offered year-round, allowing for flexible scheduling to accommodate candidates' needs.

Q13: How can I prepare for the AIT COQ examination?

A13: To prepare for the examination, you should complete the required training from an approved program and review the [AIT COQ examination Content Outline](#) provided by the NCBAHM.



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Q14: How much is the AIT COQ examination?

A14: Please visit the [NCBAHM website](#) for breakdown of fees:

- Administrative fee to the NCBAHM for the purchase order
- New exam authorization to PearsonVue

Q15: What if I do not pass the AIT COQ examination?

A15: Passing score is 70%; scores less than 70% in either domain require the applicant to retake the assessment. [Click Here for the AIT COQ Final Assessment Content Outline](#).

There is a 45-day waiting period between exam attempts and exam fee for each attempt to pass the Final Assessment.

Conclusion

Q16: Where can I find more information about the AIT COQ?

A16: More information about the AIT COQ, including detailed eligibility criteria, application procedures, and examination content, can be found on the [NCBAHM website](#). You can also contact NCBAHM directly for specific inquiries. Email: CertificatePrograms@theNCBAHM.org

The NCBAHM AIT COQ is a valuable certificate for acupuncturists seeking to expand their skills and enhance their practice. By meeting the eligibility requirements, completing the necessary training, and passing the examination, you can achieve this certificate of qualification and provide a higher level of care to your patients. For more information, be sure to visit the [NCBAHM website](#) and stay updated on the latest guidelines and resources.