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**INDIANA PROFESSIONAL LICENSING AGENCY
INDIANA BOARD OF PHYSICAL THERAPY**

Practice Ruling #2023-12-1

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ISSUES

May a physical therapist who has not complied with 842 IAC 1-6-2 provide dry needling services under the direct supervision of a qualified physical therapist who has complied with 842 IAC 1-6-2?

STATEMENT OF FACTS

The requesting party represents the physical therapy profession. Physical therapists have traditionally practiced dry needling. On March 23, 2023, the Board promulgated a final rule regarding the practice of dry needling. The new rules require physical therapists to obtain fifty (50) hours of specific education prior to practicing dry needling. The education requirements go into effect on June 30, 2024.

Physical therapists often practice in conjunction with other physical therapists. In these circumstances, physical therapists who have not fully completed the dry needling education seek to perform dry needling under the supervision of physical therapists who have completed the dry needling education.

DISCUSSION

Based on the foregoing facts, the requesting party requests a ruling as to whether physical therapists who have not fully completed the required dry needling education may provide dry needling services under the direct supervision of a qualified physical therapist who has undergone the dry needling education.

Pursuant to 842 IAC 1-6-2(i), physical therapists “must have the knowledge, skill, ability, and competence to perform dry needling.” To be considered competent to perform dry needling, “a physical therapist must successfully complete a minimum of fifty (50) hours of education specific to dry needling theory, practice, and technique of which forty (40) hours must be completed in person.” *Id.*

Education in dry needling theory, practice, and technique must meet the requirements of 842 IAC 1-7-5 satisfy this requirement. *Id.* at (i)(2). Accordingly, certain entities are qualified to design and deliver dry needling education programs. 842 IAC 1-7-5. These programs may include a practical element. 842 IAC 1-6-2(i).

Physical therapists wishing to practice dry needling outside authorized coursework must also meet documentation requirements. “The physical therapist bears the burden of proof of sufficient education and training to ensure competence with the treatment or intervention.” *Id.* at (i)(2). Upon request by the Board, “the physical therapist providing dry needling services shall provide documentation of completion of the training required by this rule.” *Id.* at (i)(3). Failure to provide documentation results in a finding that the “physical therapist is not competent and shall not be permitted to perform dry needling.” *Id.* at (i)(5).

Once qualified by education, the physical therapist is permitted to provide dry needling services. The dry needling services must be performed by the qualified physical therapist. *Id.* at (i)(5). The dry needling services may not be delegated to another practitioner. *Id.*

Supervision of dry needling services is separately addressed with respect to physical therapy assistants. Delegation of dry needling services to physical therapy assistants is specifically prohibited. 842 IAC 1-1-2(d). This prohibition exists even when the assistant is under the direct supervision of a physical therapist. *Id.*

RULING

Based on the information provided, a physical therapist may only practice dry needling either as part of authorized dry needling coursework or after completion of the education required 842 IAC 1-6-2(i). A physical therapist may not delegate dry needling services to another physical therapist or physical therapy assistant.

CAVEAT

This ruling is issued on the assumption that the facts and circumstances as stated by the requesting party are correct. If the facts and circumstances given are not correct, or if they change, then the requesting party may not rely on it. However, other practitioners with substantially identical factual situations may rely on this ruling for informational purposes in conducting their practice. If a practitioner relies on this ruling and the Board or Commission discovers, upon examination,

that the fact situation of the practitioner is different in any material respect from the facts and circumstances given in this ruling, then the ruling will not afford the practitioner any protection. Subsequent material changes in statute, regulation, or case law will void the ruling.