Acupuncture/Dry Needling

OCT 08 2015

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AND THE STREET PRODUCTION		I have been a patient of Beth Yerrell					
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Plea	Please use the space below to further explain your opinion (more space on the back):				
Yo	ur N	Name (required): DOROTHY A. FLORES			
Ha	N	ing had experience dewing the past 63 years with			
cl	Ú	opractors, and other health-care professionals,			
<u></u>	l f	eel very strongly that chiropators should practice			

more on back...

Your Name: DOROMY A. KORÉS their professione, as should other practice the professions in which they have been trained and certified and who been their licenses Current, I have seen too many " professionals" in the health care arena who become taily distracted because of office necessies patient interactions, or attendes, influences. I choose my health ears profes with great care and I want them to be tocured, Plant consider how minimal 24 hours, 100 hours or 300 hours of training actually w. When inserting needles into gratient's body, it is imperative that the in so much more than firt the placement rudgment of placement can do severe I would urge the Sowa Board to seriously Consider the consequences of not requiring standards for anyone who is allowed to ensert needles into the human body-

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Your Name (required): <u>James</u> C, Loss						
I do not Think anyone but fully licensed						
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do meedling at any level.						
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Please use the space below to further explain your opinion (more space on the back):							
Yo	ur I	Name (required): LINDA CARPENTER					
Education is vital, don't allow charapactors,							
\$100000 dell'articolor		pysical Thingists, athletic trainers dry needle.					

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Your Name: _	ANNE AVISE		_	
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Your Name (required): Dry neldling Slems SO ignoraut				
of unsafe when performed by someone w				
Such little pructice. Truger point injections				
done my doctors is a better practice. 7				
more on back				

Your Name: Carture
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about certifications, IF they "Hunk"
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from a chiro or P.T. is the same
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Acupuncture/Dry Needling

On 11 September 2015, a handful of Iowa licensed acupuncturists attended the Iowa Board of Physical and Occupational Therapy's Meeting. The agenda allowed for time to discuss whether physical therapists should be allowed to perform an acupuncture technique they call Dry Needling. All of the acupuncturists in attendance spoke against PTs performing this invasive therapy, but physical therapists in attendance argued for the "Dry Needling" acupuncture technique to be allowed. Following this meeting, the Iowa POT Board will allow public input on this matter *only until October 29*. Then they will deliberate and make a final decision in December. The Board published the following statement:

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Feel free to use this sheet to record your opinion on this public safety matter, so that your views may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check "Yes" or "No" for who you think should be allowed to use acupuncture needles:

Yes No

Licensed Acupuncturists, 2500+ hours (including 700-900 hours of supervised clinical internship) of training, Nationally Accredited Graduate Degrees.

Doctors of Chiropractic, 100 hours of non-accredited, certified training.

Physical Therapists, minimum 24 hours of training in Dry Needling.

Athletic Trainers, minimum 24 hours of training in Dry Needling.

Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required):

Style Aikin 1706 Burr Daks Drive 515 Geb-4445 west Des Morres III.

For board Iowa Pot I Jund it

Your Name: Judy Aikin allotoing a medical profession to be "watered down" to this degree. The very sad part of this story is there are so many Jeople being duped out of the many positive treatments that real acusuncture provides. No profession should be allowed to call thouselves something they are not - Very simply but Please regulate this problem so citizens receive the treatments they are expecting. and realize the outcomes that they read about and hear from others that have experienced true adapuncture from a true Acujuncturist. Please feel free to call me for an interview on my treatments.
515 988-4445

Dry Needling

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Plea	se use the space below to further explain you opinion (more space on the back):
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more on back...

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Please use the space below to further explain you opinion (more space on the back):					
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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):			
Your Name: Mary Janssen			

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back): Your Name: Agaila Zeala
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Please use the space below to further explain your opinion (more space on the back):
Your Name (required): MARY C. CHICOINE
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Your Name: Mary C Chicoine
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Your Name: D'iane Bergren

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Plea	se us	e the space below to further explain you opinion (more space on the back):	
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Feel free to use this sheet to record your opinion on this public safety matter, so that your opinion may be submitted to the Board. You may also send letters or emails directly to the Board.

Yes	140	
国 inter	□ :nshi	Licensed Acupuncturists, 2500+ hours of education(including 700-900 hours of supervised clinical p) resulting in Nationally Accredited Graduate Degrees.
		Doctors of Chiropractic, 100 hours of non-accredited, certified training.
		Physical Therapists, minimum 24 hours of training in Dry Needling.
		Athletic Trainers, minimum 24 hours of training in Dry Needling.
		Medical Doctors, with 0 to 300 hours of training.
		e the space below to further explain you opinion (more space on the back):
Yo	ur N	Name (required): <u>Jan Schirm - Wau</u> kee
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OCT 08 2015

Acupuncture/Dry Needling

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Please use the back of this page to further explain your opinion.			
Print Your Name (required): Barb Abbott Signature: Bab Abbott			
City	City/State/Zip code: Omes, Down 50016		

Dry Needling

OCT 09 2015

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Your Name: Place Krewer				

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):		
Your Name: Janeary Blossau		

October 3, 2015

Irene Bassler 13774 Surrey Lane Dubuque, IA 52002

Iowa Board of Physical and Occupational Therapy 321 E. 12th Street Des Moines, Iowa 50319

ATTN: Judy Manning

Dear Members,

I am a registered nurse who has been practicing for over 40 years. I have worked in many departments and have taken many hours of training in different areas of health care. But just because I have taken a few courses in different disciplines does NOT mean I am proficient in those areas of health care and it certainly does not mean I should be practice on patients without proper supervision and learning.

As a patient, I have seen doctors, nurse practitioners, chiropractors, physical therapists as well as a licensed acupuncturist (NOT a chiropractor who does acupuncture). I believe each of these health disciplines have their own expertise and I trust that they have had the proper training in their respective fields.

However, recently I have learned from my own chiropractor and my acupuncturist that physical therapists and chiropractors are starting to practice "dry needling" — this seems like it might be a term they have coined so they can practice acupuncture without proper and significant training. It is my understanding that the "dry needling" they have started practicing is the same as the practice of using acupuncture aschi points. It is also my understanding that the majority of physical therapists and chiropractors do not have extended training in acupuncture (weekend training a couple of times a month is NOT sufficient training).

Please, stop this dangerous practice of allowing sufficiently untrained physical therapists from practicing acupuncture -- dry needling IS acupuncture, no matter what they want to call it.

For the sake of public safety, please tell physical therapists to stick to practicing the skills in which they went to school for. .. and I repeat, a few weekend classes is NOT proper training -- if they want to practice acupuncture, then please tell them to go back to school for at least 2000 hours.

Thank you for your time.

Irene Bassler

Sincerely,

Irene Bassler

OCT 0 9 2015

ATTN: JUDY MANNING

IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY

321 E. 12th STREET

DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other disciplines not sufficiently trained to practice acupuncture. It is my belief that "Dry needling" is actually acupuncture using acupuncture needles and acupuncture points (aschi points).

Dear Ms. Manning and Board Members,

I go to a licensed conjuncturest who has years of training. Dam concerned that physical throughste are Now practicing accupulative but calling it "dry-veeding". They have limited training but are performing a medical treatment that is highly specialized and gaving patients a false sense of security. This is an insult to those who have had the proper training to become a licensed acaptanist acupuncturist.

Som & Bash

Emily Hurm 3408 Woodland Ave Suite #305 West Des Moines, Iowa 50266

Iowa Board of POT 321 E 12th Street Des Moines, Iowa 50319

To the Iowa POT Board:

In regards to the Physical Therapy Board wanting to allow Dry Needling into their scope of practice, I must say I disagree. In the definition of the modalities physical therapists may use, nowhere does it mention invasive procedures such as puncturing the skin.

Physical therapy is that branch of science that deals with the evaluation and treatment of human capabilities and impairments. Physical therapy uses the effective properties of physical agents including, but not limited to, mechanical devices, heat, cold, air, light, water, electricity, and sound, and therapeutic exercises, and rehabilitative procedures to prevent, correct, minimize, or alleviate a physical impairment. Physical therapy includes the interpretation of performances, tests, and measurements, the establishment and modification of physical therapy programs, treatment planning, consultative services, instructions to the patients, and the administration and supervision attendant to physical therapy facilities. (PHYSICAL THERAPY, §148A.1)

According to the Merriam-Webster Dictionary, "mechanical" means "of or relating to machinery" and "device" is "an object, machine, or piece of equipment that has been made for some special purpose." According to the Free Dictionary "mechanical device" means "mechanism consisting of a device that works on mechanical principles." Based on these explanations and definitions, it does not seem to be giving physical therapists the right to insert needles into the human body.

While physical therapists may know the anatomy of the body very well, they may not be aware of all that is happening when you insert a foreign object into the skin. They are very knowledgeable and great at their job, but the use of needles is not a part of their area of expertise. My question is: why do they want dry needling to be allowed? I think it is safe to say this issue has come up because the use of needles is effective. Which is wonderful news! However, just because the modality works and physical therapists want to use it, doesn't mean they are qualified or licensed to do so.

Throughout my course of training to become an acupuncturist, I have undergone 3,000 hours of master level training and 720 hours in clinical internships with supervision. A professional acupuncture curriculum must consist of at least 705 hours in Oriental medical theory, diagnosis and treatment techniques in acupuncture and related studies, 660 hours in clinical training, 450 hours in biomedical clinical sciences, and 90 hours in counseling, communication, ethics, and practice management.

Dry Needling

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):			
Your Name: Emily Hurm			

My name is Deb van Latenstein and I am a licensed acupuncturist in the state of Iowa. I have been practicing in Iowa since 2007. I attended and received my diploma in Acupuncture and Oriental Medicine from Northwestern Health Sciences University in Bloomington, Minnesota. I took national boards to certify my knowledge in the areas of Acupuncture, Herbology and Oriental Medicine. I'd like to address my concerns related to the issues of dry needling and the use of acupuncture by those not licensed to practice acupuncture.

In the 1980's I remember hearing about an acupuncturist practicing in Iowa. At the time there was no licensure program. His practice of acupuncture was brought to the attention of the Iowa legislature – and with the intent to protect the public from the dangers of practicing without a license or the oversight of a governing (medical) board, he was told to cease practicing in Iowa. He was quickly put of out of business and he left the state to practice elsewhere. Those who wanted to receive acupuncture had to do so out of state at that time.

In the 1990's, a need was growing and the public demanded that they have access to acupuncture, a proven modality to treat many health issues. A licensure program was developed and passed through the legislature. The Iowa Medical Board was designated as the governing board and set high and rigorous standards to all acupuncturists that wanted to practice in Iowa. All licensed acupuncturists in Iowa must graduate from an accredited acupuncture school, with a minimum of 2500 hours of classroom and clinical hours. They must pass their national boards. They also must complete ongoing education and reapply for licensure every two years. These requirements help to ensure that those practicing acupuncture in Iowa are *qualified* to practice acupuncture with the highest safety standards known to protect the public.

Recently it has been brought to my attention and the attention of the Iowa Association of OM & Acupuncture (IAOMA) that there is a *subset group* of physical therapists that are utilizing acupuncture needles in their practice. This is disturbing to me and to those in the acupuncture profession for a number of reasons.

The profession of acupuncture is being watered down and carelessly imitated and passed off as a new and unique therapy. It is being incorporated into another profession's scope of practice – without safety standards. Those practicing in the PTOT profession are ignoring the current laws that have been put into place to protect the public, as our profession is upheld to do.

When this sub group of physical therapists uses acupuncture it aims to undermine and devalue the profession of acupuncture. It also aims to confuse and defraud the general public – including unsuspecting patients that are being treated with acupuncture needles, insurance companies that pay for these services, as well as the legislative and judicial bodies that govern the safe practices of acupuncture in Iowa.

Illegal: While these physical therapists have been advertising the use of dry needling, they have been utilizing acupuncture needles and puncturing the skin with them. By definition, this is acupuncture and they are not licensed to do so. There is no supervision, no approved accredited training, no licensure standards, no continued oversight or ongoing education that physical therapists are required to follow. According to Iowa law, this is illegal.

Deception & Confusion: When physical therapists use the term 'dry needling', they do so by claiming that it is not the same as acupuncture. Yet in PT literature, dry needling is advertised as the insertion of a filament needle (aka acupuncture needle) directly into a myofascial trigger point to release tension and decrease pain. Acupuncture is defined as the insertion of a filament needle into the body. It has also been stated that dry needling dates back to the early 7th century when Sun–SSu Mo, who was a Taoist doctor that utilized 'ashi' points. These ashi points are acupuncture points that are also known as modern day trigger points.

The PTOT board did not consult with the Iowa Medical Board, which governs and oversees the practice of acupuncture. The PTOT board did not consider or consult with any practicing acupuncturists to clearly define their scope of practice. In board discussions, they concluded that since there wasn't any clear definition in the description of their profession or scope of practice - that the omission itself must then indicate that they have a right to practice acupuncture and incorporate it into their practice. This is exactly why in the 1980's the first acupuncturist in Iowa was told to leave, because he was practicing without a license.

Predatory, Undermining & Devaluing: While the acupuncturists are bound to the high standards of licensure in Iowa, the acts of the physical therapists utilizing dry needling techniques are causing harm to the field of acupuncture. While potential patients may be looking for acupuncture as a treatment for their ailments, they may not choose to do so with an acupuncturist because many insurance policies do not cover acupuncture treatments. But, if they go to a physical therapist that can treat them with acupuncture needles (and can code in such a way to get those treatments paid for through their insurance), then they can see the economic benefit to choose a PT over an acupuncturist. This is a predatory practice and it serves to undermine and devalue the education, skills and practice of acupuncture.

The above stated reasoning is justification for PT's to cease and desist utilizing acupuncture needles in their field. For similar reasons, those within each field of practice must fulfill requirements and adhere to the laws that govern them. I believe the proper route to obtain a license for any of these professions is clearly defined in the Iowa laws set forth by the legislature. Those wanting to practice according to those laws should meet all the requirements listed and apply for a license to do so in the state of Iowa. Therefore,

I am not a licensed MD and do not perform surgeries or prescribe pharmaceuticals.

I am not a licensed pharmacists and do not fill prescriptions.

I am not a licensed RN and do not give immunizations.

I am not a licensed chiropractor and do not perform adjustments for proper alignment.

I am not a licensed dentist and do not perform x-rays, extractions or fill cavities.

I am not a licensed physical therapist and do not perform manual physical therapy

What I am is a licensed acupuncturist and I have completed all the requirements that have been set forth by the Iowa legislature to practice acupuncture in the state of Iowa. Furthermore, when I recognize the need for attention beyond my scope of practice-I have, and often do, refer out to those more qualified in their respective areas of expertise.

Thank you for your full consideration in this matter.

Sincerely

Deborah van Latenstein, L.Ac., Dipl. OM

OCT 1 2 2015

Dry Needling

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You	Your Name: Don Krug			

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YOU	Your Name: 100 Willenbory		

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Your Name: Deana Kande		

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You	ır N	ame: Kita M Manteinach

Dry Needling

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Please check any and all boxes for who you think should be able to use acupuncture needles:
Yes No
☐ Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.
Doctors of Chiropractic, 100 hours of non-accredited, certified training.
☐ ☐ Physical Therapists, minimum 24 hours of training in Dry Needling.
Athletic Trainers, minimum 24 hours of training in Dry Needling.
☐ ☑ Medical Doctors, with 0 to 300 hours of training.
Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):
Your Name: Man & Gland

OCT 1 2 2015

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You	ır N	ame: Mary Beth Althaus

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Let uspace	s, an	d the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more he back):
You		I only want someone who actually knows what they are doing because they have the proper schooling. I feel the human body is a complected organ and needs extensive knowledge on how to that it and ease for it. I wouldn't let a Dr. with minimum hours of training work one me are take care of me.

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		ame: Suzole Hughes
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		ame: Sandia Greano

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You	ır N	d the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more ame:
,	Ch Le W	have had this procedure done by a Dr of iropractic and sound it to only be temporary lies, if any. A waste of money for Patients, where is did find complete relies from a 2:1, of a waste of money.

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		ame: Drodget ViviZager

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Your Name: Monica Schmitt		

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(M	hen Needling - you niced to know about the points of aestron-because of healing Both Physical x emotional

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Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):
Your Name: Meghan Thies

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Your Name: Plather Jungblut
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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.

Doctors of Chiropractic, 100 hours of non-accredited, certified training.

Physical Therapists, minimum 24 hours of training in Dry Needling.

Athletic Trainers, minimum 24 hours of training in Dry Needling.

Medical Doctors, with 0 to 300 hours of training.

Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):

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OCT 1 2 2015

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	X	Medical Doctors, with 0 to 300 hours of training.		
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Your Name: Katil Effetz	1:1 /		
	You	ır N	lame: Katil Effetz

Manning, Judy [IDPH]

From:

GEORGE OLESON <geoole@msn.com>

Sent:

Monday, October 12, 2015 11:28 AM

To:

Manning, Judy [IDPH]

Subject:

Use of acupuncture needles

To: Iowa Board of Physical and Occupational Therapy

I am writing at the suggestion of my acupuncture therapist, Katherine Whitmore Chuapoco, to offer my thoughts regarding the use of acupuncture therapies -- or dry needling -- by medical professionals, chiropractors, and physical therapists who lack the rigorous training demanded of acupuncturists. I urge you to protect the public's interest in maintenance of the availability of acupuncture therapy provided by -- and only by -- such acupuncture professionals.

I have been receiving acupuncture treatments from Katherine for chronic pain for nearly two years during which I have achieved the ability to effectively manage that pain. To say that I both believe in and value acupuncture therapy is and understatement. For me, it has been a God-send, and I credit Katherine's diligence and expertise for my success.

Throughout the period of my treatment, I also have worked with a licensed physical therapist (Alyssa Subbert) to whom I was referred by Katherine. Alyssa has supplemented Katherine's treatment by addressing the mechanical reasons for the pain I experience. I thus appreciate the distinction between the two disciplines as should the licensing laws and regulations of the State of Iowa. I trust the treatments provided by both Katherine and Alyssa in part because I know that each is properly trained in her own discipline. As a patient, it is particularly disconcerting to me to contemplate the possibility that anyone without extensive professional training would endeavor to engage in dry needling.

As a lay person and recipient of ongoing acupuncture therapy, I firmly believe that the State of Iowa should implement and uphold the highest standards for the provision of acupuncture therapy. I was startled to learn that this is even an issue. It shouldn't be.

I would be happy to supplement my thoughts if it would facilitate the Board's consideration of this matter.

Yours very truly,

George T. Oleson 2113 NW 136th Street Clive, IA 50325

Manning, Judy [IDPH]

From:

kirsten@coreptiowa.com

Sent:

Tuesday, October 13, 2015 1:11 PM

To:

Manning, Judy [IDPH]

Subject:

Public Comment: Dry Needling

Attn: Judy Manning

Public Comment on Dry Needling

As a PT in the state of lowa I am writing to comment on the current discussion on dry needling in our state and profession. While I, personally, do not practice dry needling, I do support the choice physical therapists have in administering it. Physical Therapists practicing under the Iowa PT licensure board, to date, have had no complaints related to dry needling performed by PTs and no malpractice insurance companies have concerns or significant claims related to PTs performing dry needling. In addition, the FSBPT reports that the academic background and clinical decision making process needed in dry needling is included in 86% of our required formal education; the remaining gap in knowledge is achieved in our post-grad training. Knowing only these few pieces of information is enough to recognize that PTs are practicing dry needling in a safe and competent manner. Continuing to work with the licensure board to clarify post-graduate training is an appropriate step to be taken in the future. As it currently stands, PTs should be able to continue incorporating their evaluation and assessment process with their dry needling practice.

Kirsten Radke, PT, DPT

Core Physical Therapy
2001 Westown Parkway, Suite 107
West Des Moines, IA 50265
515.440.3439
515.440.3832 fax

www.CorePTiowa.com



Attention:

The information contained in this message and or attachment(s) is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any system and destroy any copies

OCT 1 3 2015

Acupuncture/Dry Needling

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Please check "Yes" or "No" for who you think should be allowed to use acupuncture needles:

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Yes No

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☐ Doctors of Chiropractic, 100 hours of non-accredited, certified training.

☐ Physical Therapists, minimum 24 hours of training in Dry Needling.

☐ Athletic Trainers, minimum 24 hours of training in Dry Needling.

☐ Medical Doctors, with 0 to 300 hours of training.

Please use the space below to further explain your opinion (more space on the back):

Your Name (required): Medical Doctors, with 1 to 300 hours of training.

Your Name: Merry Zankin have depended upon acupuncture as a vital component of maintaining my health. Fifteen years app, considerable neolical symptoms had me going to a number of medical professionals. I was arren a number of nedications du

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Please use the space below to further explain your opinion (more space on the back): Your Name (required): Thomas Anderson
,

more on back...

Dry Needling

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the service, get the dagree/licensure. WHY do p.t.s want to do-this? Do the training dis Simple. Western mad. & Eastons mad. can on should be compatible + used together. But - each person needs to believe in the specialty & use it with the right accorditation. Do the work to achieve the god.

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Your Name: Mary Workefield				
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their expertise. They didn't do all that education ans training for nothing Acupuncturists aren't trying to act as physical therapists or chiropracture so why Should they try to do acupuncture? Word you let a suggest operate on you who had only attended a few classes? Of course not, that would be too vishy There's a reason these professions go through so much training, so they can be the best gradified to do their jobs. I know these other professional groups are much larger, but please don't let that sway you. The potential for accidente and injuries with non-a apuncturate is simply to high to be allowed in Iona Please Let the experts Stakto their field

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Please use the space below to further explain your opinion (more space on the back):

Your Name (required):

Jennifer Carwell

Dry Needling

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lowa Physical and Occupational Therapy Board

The practice known as "dry needling" performed by non-medical (such as physical therapists and athletic trainers), marginally trained (such as physician assistants and nurse practitioners) and other medical practitioners (such as medical and osteopathic physicians and chiropractors) should be simply and purely considered medical malpractice. The token "training" these proponents receive, as well as lack of quality control and adequate supervision during the use of Class II Medical devices in invasive procedures is appalling. Those who already practice their version of acupuncture, euphemistically called dry needling, are practicing at a level of medicine that clearly falls far below the expected standard of medical care, and may even border the status of a criminal act.

The level of training is so minimal, it is essentially non-existent. These persons have almost no knowledge of the Chinese culture nor the principles that are the very foundation of the true practice of acupuncture.

I firmly believe that this proposal is financially driven. A true medical practitioner who determines a patient may benefit from acupuncture is morally obligated to refer their patient to a fully trained, accredited and licensed acupuncturist. Anything less is unacceptable. I reiterate that those who chose to practice acupuncture themselves are negligent and are performing at a level of malpractice.

Another concern involves the financial realm pf medicine. How much is the patient charged? Is insurance billed for these procedures (either overtly or hidden, bundled in a "mega bill")? If the latter is true, then the question of insurance fraud must be addressed.

Passage of this proposal is another symptom of the decline of the quality of medical practice in the USA.

Think carefully, and foremost consider the patient. Would you rather have yourself or a family member treated by an extensively trained, fully licensed acupuncturist or someone who attended a weekend "Cliff Note" version of this facet of medicine?

Debra A. Kimball, MD

Shaa Kuboll MD





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Please use the back of this page to further explain your opinion.		
Prin	t Yoı	ur Name (required): Pamela Kay Hawhee Signature: Del 12/11
City	/Stat	e/Zip code: Amer IA 50010

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Plea	se us	e the back of this page to further explain your opinion.
Print	: You	ur Name (required): JOHN K SKERRITT Signature:
City	/State	e/Zip code: Ames, Ioun 500/0

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Dry Needling

OCT 1 3 2015

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Please check any and all boxes for who you think should be able to use acupuncture needles:

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□ Doctors of Chiropractic, 100 hours of non-accredited, certified training.	
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☐ Medical Doctors, with 0 to 300 hours of training.	
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Your Name: Jatricia Congett		

Center for Acupuncture and Healing Arts

520 39th Street • Des Moines, IA 50312

Licensed Acupuncturists • Masters of Science in Oriental Medicine • Jin Shin Jyutsu

007 1 4 2015

October 2, 2015

lowa Board of Physical & Occupational Therapy 312 E. 12th St. Des Moines, Iowa 50319

To the Iowa Board of Physical & Occupational Therapy,

My name is Katherine Whitmore Chuapoco, I am a licensed acupuncturist and a diplomate of acupuncture by the NCCAOM. I am also a registered nurse in the state of lowa, and have maintained an active R.N. license since 1996. I have been an acupuncturist in private practice for 15 years, and I was the first acupuncturist at the Des Moines VA Hospital from 2001 to Feb. 2015, specializing in pain management.

At the Des Moines VA Hospital, I was part of the Pain Management Team, working with doctors, physician's assistants, nurses, physical therapists, and most recently, chiropractors. This diversified approach gives patients the best care possible to meet their needs, decided on a case by case basis. Each person had a role in the patient's care based on their title, educational background/ training, and professional scope of practice. The beauty of the team approach really comes down to referring the patient to the provider that best fits the patient's needs. Referrals to other providers were done if the case warranted additional services or needed a new direction of care. Recognizing the difference in expertise of skills and service, and referring to the appropriate provider, sets the tone for the highest quality of care for a patient. This helps to ensure the best possible outcome. This brings me to the point I would like to make about PT's performing dry needling. They are, in a sense, standing between the patient and a more qualified provider, a licensed acupuncturist. This could mean the difference between success or failure of treatment. Physical therapists are performing an invasive technique they call Dry needling, which in fact is acupuncture. They are using an acupuncture needle while being undertrained and without proper safeguards. This becomes less about the patient, and more about what the profession has to gain by including a technique outside the defined scope of practice.

I have the utmost respect for physical therapists and I refer to them all the time for what they are able to do for the betterment of my patients. I believe they are the *experts* when it comes to manual therapy that is, a "hands on" approach with working on the muscles. I, in turn, would hope they would refer to me, an *expert* in the insertion of filiform needles, also known as, acupuncture needles based on my extensive educational background in oriental medicine and clinical experience.

Allowing physical therapists to perform dry needling, an invasive technique with minimal training, clearly poses a risk to the public's safety and undermines the notion of receiving the highest standard of care by a medical professional.

The term "mechanical device" means a mechanism consisting of a device that works on mechanical principles and is not the same thing as a "medical device," which by definition is an instrument, apparatus, implant, in vitro reagent, or similar or related article that is used to diagnose, prevent, or treat disease or other conditions, and does not achieve its purpose through chemical action within or on the body. The FDA has classified the acupuncture needle,



which is a filiform needle, as a Class II medical device. Dry needling which is the use of an acupuncture needle, referred only to as a filiform needle by Physical therapists, is the same needle that is considered a "medical device" used to puncture the skin. Saying otherwise is an example of skewing the lines of definition for the sole purpose of professional interest, rather than focusing on public safety.

In my opinion, this is not a "turf war," but is instead about respecting educational backgrounds and scopes of practice. Take, for example, the difference between a Physical Therapist and a Physical Therapist Assistant. The obvious difference is the amount of education one must complete before being licensed under the designated title. Under code 200.6(5)a. for lowa Physical Therapists Professional Licensure codes, it is stated that the PTA "shall provide only those services for which the PTA has the skills necessary and shall consult the supervising therapist if the procedures are believed not to be in the best interest of the patient." This statement showcases the levels of responsibility and skills that are based on one's education, and also intended to protect public safety by prioritizing the best interest of the patient. I believe this same idea should be true when it comes to making sure a patient is referred to the appropriate provider for a specialty service by an individual with the educational background and extensive training to show for it. This is acting in the patient's best interest. Acupuncturists have hundreds of hours of clinical training and 2000+ hours of didactic classes before actually executing our skills in using a filiform needle/ acupuncture needle on a patient. Would it really be in the public's best interest to be treated by a Physical Therapist, or anyone else for that matter, with as little as 24 hours of training to use an acupuncture needle to perform this invasive technique? I absolutely disagree with this as a Licensed Acupuncturist, as a health care provider, and more importantly, as a person of the public in the state of lowa.

Please vote against Dry needling by Physical Therapists, which is a vote *for* protecting the public's safety, *for* respecting higher educational standards, and *for* the best interest of all patients.

Thank you for your time and careful consideration.

Katherine Whitmore Chuapoco RN, M.S.O.M, L.Ac

Manning, Judy [IDPH]

From:

kgasner@iw.net

Sent:

Wednesday, October 14, 2015 10:56 AM

To:

Manning, Judy [IDPH]

Subject:

Dry Needling

Katherine Tiedeman, PT, DPT, CSCS

Buena Vista Regional Medical Center

1525 W. 5th Street

Storm Lake, IA 50588

Bureau of Professional Licensure

Attn: Judy Manning

Lucas State Office Building, 5th floor

321 East 12th St.

Des Moines, IA 50319-0075

Dear Ms. Manning:

I am a physical therapist that has been using dry needling with my patients. I am writing to you today in regards to the recent petition of declaratory order submitted by the Iowa Association of Oriental Medicine and Acupuncture stating the dry needling is not within a physical therapist scope of practice. I urge the Iowa Licensure Board to include dry needling in a physical therapist's scope of practice.

In our doctorate level physical therapy training, we get extensive anatomy instruction which includes dissection of cadavers. The caliber of the anatomy classes we take are the exactly the same as medical students. In fact, physical therapy students and medical students are in exactly the same anatomy classroom. Physical therapy schools also place a heavy emphasis on palpation skills. Physical therapists also receive instruction in wounds, wound care, clean and sterile procedures. Lastly, at dry needling courses, we are required to pass a skills test and a written exam.

Safety is always a high priority with any type of treatment we are performing. Dry needling is no exception. In fact it is stated in our profession's Code of Ethics Principle #3 states "Physical therapists shall be accountable for making sound professional judgments" http://www.apta.org/Policies/Ethics/.

In my physical therapy practice, dry needling has been a very valuable treatment technique. I do not use dry needling as a stand-alone treatment nor do I claim that I am performing acupuncture. I use dry needling in conjunction with other physical therapy techniques. Consequently, dry needling along with other physical therapy treatment techniques has helped to decrease pain and increase function in hundreds of my patients.

I urge the Iowa State Board of Professional Licensure to include dry needling within the scope of practice for physical therapist. Physical therapists have the knowledge to perform this treatment technique in a safe and effective manner.

Thank you for your attention on the very important manner.

Professionally,

Katherine Tiedeman, PT, DPT, CSCS

OCT 1 4 2015

Acupuncture/Dry Needling

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Please check any and all boxes for who you think should be allowed to use acupuncture needles:

Yes No

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Please use the back of this page to further explain your opinion.		
Print		r Name (required): KAYE CARSON Signature: Kaye Carsox
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Your Name (required): William J. Breen Will

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Dry Needling

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All submissions must be received by October 29, 2015." The Board is located in the Lucas Building, at 321 E 12th St, Des Moines, IA.

Feel free to use this sheet to record your opinion on this public safety matter, so that your opinion may be submitted to the Board. You may also send letters or emails directly to the Board.

Please check any and all boxes for who you think should be able to use acupuncture needles:					
Yes	No				
K		Licensed Acupuncturists, 2500+ hours of training, Nationally Accredited Graduate Degrees.			
	×	Doctors of Chiropractic, 100 hours of non-accredited, certified training.			
	×	Physical Therapists, minimum 24 hours of training in Dry Needling.			
	′,	Athletic Trainers, minimum 24 hours of training in Dry Needling.			
	X	Medical Doctors, with 0 to 300 hours of training.			
	Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back): Your Name: Rob Weingerst The same regularments for licensing of acupuncturists Should exist for anyone wishing to practice				
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Sh	04	Id exist for anyone wishing to practice			
IX Re		uniture or use acupaniture redles. an in your professional Scope of pactice!			

Date: 10/8/15

OCT 1 6 2015

ATTN: JUDY MANNING IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY 321 E. 12TH STREET DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

as a beensed managetherapist and avid accepancture client/patient, clam concerned about the health of safety of the public when al hear of physical bherapists, brainers, etc using dry needling techniques with clients. Buy needling is accepancture and should therefore only be performed by trained because accepancturiets. I enjoy many modalities of healing with many paditionary and would not feel at all safe or comfortable having "dry needling" performed by a pt, tatoo artist, manage, sincerely, sportstrainer of chirofiactor.

Kinsti Norman, IMI

ATTN: JUDY MANNING IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY 321 E. 12TH STREET DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,
Cam an RN that has been going to a licensed
acupuncturest for 22 years & relline any spenning
that wants to use acupuncture for treatment
should be required to be licensed, not just
go to a few hours class. The public on a
Twhole as no edea there is a difference between
a licensed acupuncturest & sonocone just doing it
like a P.T. or Chiro. Please do not allow P.Totother
disciplines of stactioners to do their skilled therapy
without proper ridining
Sincerely,
Cone Moltoskenson R. M

Date:

ATTN: JUDY MANNING

IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY

321 E. 12TH STREET

DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

Plase ensure the safety of all patients Seeking acupuncture by eliminating the use of "dry needing."

Sincerely,

Damela S. Engelker

DCT 1 6 2015

Dry Needling

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Yes No

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□ ▼ Doctors of Chiropractic, 100 hours of non-accredited, certified training.

□ Physical Therapists, minimum 24 hours of training in Dry Needling.

□ ★ Athletic Trainers, minimum 24 hours of training in Dry Needling.

□ ★ Medical Doctors, with 0 to 300 hours of training.

Please check any and all boxes for who you think should be able to use acupuncture needles:

Please use the space below to further explain you opinion (more space on the back):

Your Name (required): Jennifer Horner

Other than a licensed acupuncturest, those on the

list above are not properly trained to perform

acupuncture. They have inadequate educated

	<u>Jennyfer</u>				
which	creates	۵	safety	. concur	
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Dry Needling

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	Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):						
You	Your Name: Tiffany Manning						
No. of Control of Cont							

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Please check any and all boxes for who you think should be able to use acupuncture needles:

Yes No

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	is, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more e on the back):						
Yo	ur Name: <u>Janet Shepherd</u> , Ph.D. Licensed Psychologist Jowa City, IA						
*LOUISING PATRICTOR	Iowa City, IA						
AMBAN MINISTER AND							
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☐ Medical Doctors, with 0 to 300 hours of training.
Let us, and the Iowa Board of Physical and Occupational Therapy, know why you checked what you did (more space on the back):
Your Name: <u>Bluna Thompson</u>

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A D	Medical Doctors, with 9 to 300 hours of training.
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Your Name: CRAG STERES	
New Address Control of	

Date: October 8,2015

OCT 1 6 2015

ATTN: JUDY MANNING
IOWA BOARD OF PHYSICAL AND OCCUPATIONAL THERAPY
321 E. 12TH STREET
DES MOINES IOWA 50319

RE: The practice of "dry needling" by physical therapists and other practitioners not sufficiently trained to practice acupuncture. It is my belief that "dry needling" is actually acupuncture using acupuncture needles and acupuncture points (ashi points)

Dear Ms. Manning and Board Members,

I have witnessed the damage Someone
(physical Therapist) Can do nith dry
Needlines techniques. Surgery is now
required to correct The findinduals Pain.
PLEASE do unat is needed to insure
That accipinature be performed by
trained certified acupunturists.
Would you want someone with only a few
hours of training working on your energy
points - better example would you want
sincerely, a physical Therapist obing

In Hen Sugery on you? It is a Similar
Problem.

Please do not allow This to Continue!