

**Department of Health
Office of Health Professions
Board of Naturopathy**

Guideline

Revised – 10/18/11

Title:	Naturopathic Physicians performing dry needling	Number: BON 22-01
References:	Chapter 18.36A RCW; meeting minutes for November 16, 2012; February 22, 2012; February 12, 2022; May 13, 2022	
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	Chair, Board of Naturopathy	

The Board of Naturopathy (board) takes the position that the practice of dry needling generally falls within the scope of practice for naturopathic physicians. Accordingly, it is the board’s position that a properly trained naturopathic physician may perform dry needling under chapter 18.36A RCW.

As required by chapter 18.130 RCW, the Uniform Disciplinary Act (UDA), any naturopathic physician who practices dry needling must ensure that they are properly trained and have the requisite skill, knowledge, and experience to safely practice. Likewise, the naturopathic physician must ensure they follow all Washington law governing title protection.

Background

In general, dry needling involves the insertion of thin, solid needles to penetrate the skin for therapeutic effect. It is also known as intramuscular stimulation, intramuscular manual therapy, trigger point dry needling, or intramuscular needling, and is defined as:

A skilled intervention that uses a thin filiform needle to penetrate the skin and stimulate underlying myofascial trigger points, muscular, and connective tissues for the management of neuromusculoskeletal pain and movement impairments. Dry needling (DN) is a technique used to treat dysfunctions in skeletal muscle, fascia, and connective tissue, and diminish persistent peripheral nociceptive input, and reduce or restore

impairments of body structure and function leading to improved activity and participation¹.

Applicable law

Naturopathic medicine is defined in statute as “vitamins; minerals; botanical medicines; homeopathic medicines; hormones; and those legend drugs and controlled substances consistent with naturopathic medical practice in accordance with rules established by the board [of naturopathy].” [RCW 18.36A.020\(12\)](#). [The naturopathic physician scope of practice act, RCW 18.36A.040](#), further defines [naturopathic medicine](#) as “the practice by naturopaths of the art and science of the diagnosis, prevention, and treatment of disorders of the body by stimulation or support, or both, of the natural processes of the human body”; and includes a nonexclusive list of techniques such as “common diagnostic procedures” and “minor office procedures.” These terms are defined in statute as:

(4) "Common diagnostic procedures" means the use of venipuncture consistent with the practice of naturopathic medicine, commonly used diagnostic modalities consistent with naturopathic practice, health history taking, physical examination, radiography, examination of body orifices excluding endoscopy, laboratory medicine, and obtaining samples of human tissues, but excluding incision or excision beyond that which is authorized as a minor office procedure.

(10) "Minor office procedures" means care and procedures incident thereto of superficial lacerations, lesions, and abrasions, and the removal of foreign bodies located in superficial structures, not to include the eye; and the use of antiseptics and topical or local anesthetics in connection therewith. "Minor office procedures" also includes intramuscular, intravenous, subcutaneous, and intradermal injections of substances consistent with the practice of naturopathic medicine and in accordance with rules established by the secretary.

[RCW 18.36A.020](#), emphasis added.

Analysis

[RCW 18.36A.040](#) states that the practice of naturopathic medicine “includes” a variety of techniques listed in statute. In general, the use of the word “include” in a definition is construed as a term of enlargement, rather than limitation.² Accordingly, the Board construes the definition of naturopathic medicine to include treatments or practices similar to those listed in the definition, provided that the treatments or practices are otherwise consistent with RCW 18.36A.³ Since dry needling is intended to stimulate the natural processes of the body, it is the Board’s position that it falls within the scope of naturopathic physicians.

This conclusion finds further support in the fact that the statutory framework surrounding naturopathy expressly allows naturopathic physicians to perform a variety of injections, incisions, excisions, and

¹ AGO 2016 No. 3 – Apr 15 2016, quoting American Physical Therapy Ass’n, *Description of Dry Needling In Clinical Practice: An Educational Resource Paper (APTA Paper)* 2 (Feb. 2013).

² A. Norman J. Singer & J.D. Shambie Singer, *Statutes and Statutory Construction*, § 47:7 (7th ed. 2007); [Queets Band of Indians v. State](#), 102 Wn.2d 1, 4, 682 P.2d 909, 911 (1984)

³ *Simpson Inv. Co. v. Dep’t of Revenue*, 141 Wn.2d 139, 151, 3 P.3d 741 (2000) (“general terms, when used in conjunction with specific terms in a statute, should be deemed only to incorporate those things similar in nature or ‘comparable to’ the specific terms”).

other forms of medical care that pierce or puncture the skin and penetrate human tissue under the scope of “minor office procedures.” This would include treatments such as inserting a needle into an abscess in order to alleviate purulent matter or utilizing a needle to perform nerve conduction velocities. Dry needling itself is minimally invasive⁴ and would arguably be classified as a minor office procedure, particularly since the definition of minor office procedure uses the term “includes” and therefore should be read broadly. Even if dry needling did not fall within the express definition of minor office procedure, permitting the practice of dry needling would be consistent with this broad authority to pierce or puncture the skin. Furthermore, interpreting RCW 18.36A as allowing naturopathy physicians to perform intramuscular, intravenous, subcutaneous, and intradermal injections of substances, but not allowing the naturopathic physician to insert a needle through skin without the introduction of any substance itself, would strain reason.

Lastly, it is the board’s position that while certain aspects of the practice of dry needling may overlap with acupuncture, these two practices are distinguishable. Acupuncture is a subset of medicine with its own systematic paradigm of medical care in which the therapeutic intent is often to treat someone by manipulating the flow of Qi, also known as Chi. If a practitioner treats someone with a needle to manipulate the flow of Qi/Chi, they are practicing acupuncture, which is regulated by RCW 18.06 and requires an appropriate credential.

Conclusion

In summary, it is the board’s conclusion that chapter 18.36A RCW permits the practice of dry needling by a properly trained naturopathic physician with the requisite skill and expertise.

⁴ Morihisa R, Eskew J, McNamara A, Young J *Dry Needling in Subjects with Muscular Trigger Points in the Lower Quarter: A systematic Review*, Int J Sports Phys Ther. 2016;11(1):1-14.