



ARIZONA BOARD OF ATHLETIC TRAINING

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Dry Needling Standards of Education and Training Frequently Asked Questions

1. To whom does this law effect?
 - a. Any Arizona licensed athletic trainer prior to engaging in the technique dry needling.
2. What minimal training is required?
 - a. A course completed, regardless of when it was taken, must demonstrate the following requirements to meet the minimum standards in A.A.C. R4-49-406.
 - i. Approval, which must be documented when submitted to the Arizona Board of Athletic Training ("Board"), from one of the following entities
 1. Commission on Accreditation of Athletic Training Education,
 2. National Athletic Trainers' Association,
 3. Board of Certification, Inc.,
 4. State or district associations of the National Athletic Trainers' Association, or
 5. Specialty groups or societies of the National Athletic Trainers' Association.
 - ii. Course content, which must be documented when submitted to the Board, of one of the following clean needle procedures
 1. The U.S. Centers for Disease Control and Prevention, or
 2. The U.S. Occupational Safety and Health Administration.
 - iii. Course content, which must be documented when submitted to the Board, covering anatomical review.
 - iv. Course content, which must be documented when submitted to the Board, covering blood borne pathogens.
 - v. Course content, which must be documented when submitted to the Board, covering contraindications and indications for dry needling.
 - vi. The course must have a written exam covering the content of the course, which must be documented when submitted to the Board.
 - vii. The course must have a practical examination covering the relevant content of the course, which must be document when submitted to the Board.
 - viii. The course content must be a minimum of 24 contact hours in length, which must be documented when submitted to the Board.

3. When does documentation, establishing completion of the minimum training, need to be provided to the Board?
 - a. The documentation is due on or after September 30, 2022, prior to performing dry needling interventions.
 - i. **If a licensee completed training before September 30, 2022**, a licensee should compare documentation of the training to the information required to be submitted as listed under Question Two (2) above, and determine if the licensee can produce the required documentation. If a licensee has the required documentation, the licensee should submit the information to the Board within the first thirty (30) days after the laws effective date of September 30, 2022. If a licensee cannot prove the required standards have been completed, contact the course provider to obtain the needed information and documentation. If the course completed did not have the required course content, the licensee will need to complete the required education and training prior to performing dry needling interventions.
 - ii. **If a licensee completed training after September 30, 2022**, compare the course content to the standards of education and training in A.A.C. R4-49-406 and obtain documentation that the course meets all listed requirements. Submit the documented proof of the completed course content within thirty days of completing the course.
 - iii. **If a licensee completed training before gaining licensure in Arizona**, compare documentation of the training to the information required to be submitted as listed under Question Two (2) above and determine if the required documentation can be produced. If a licensee has the required documentation, submit the information to the Board within thirty (30) days after licensure. If a licensee cannot prove the required standards have been completed, contact the course provider to obtain the needed information and documentation. If the course completed did not have the required course content, complete the required education and training.
 - b. All licensees will receive a letter from the Board confirming the Board received the submission of dry needling education and training documentation. If Board staff found the documentation may lack sufficient information to demonstrate compliance with the education and training standards, the licensee will be notified and Board staff will work with the licensee to attempt and resolve any apparent deficiencies. However, it is the licensee's responsibility to be able to demonstrate compliance with the law.

4. What forms of documentation may a licensee provide to demonstrate compliance with the education and training standards?
 - a. Certificate of Completion which documents all of the requirements of A.A.C. R4-49-406.
 - b. Certificate of Completion with supporting documentation that demonstrates completion of the requirements in A.A.C. R4-49-406 (e.g. course syllabus, letter from course instructor, letter from course provider, letter from course approver).
5. What does a licensee need to report to the Board during renewal if the licensee has received dry needling training?
 - a. Starting in 2023, all renewals for athletic training licenses will have a question regarding completion of the dry needling training. The answers on renewals will be compared to the list of licensees that have previously provided documentation of dry needling education and training. If a licensee is providing dry needling and has not provided the required information to the Board, licensee may be contacted by Board staff to resolve the discrepancies.
6. What action can the Board take if a licensed athletic trainer in Arizona uses dry needling when they have not completed the minimum education and training?
 - a. Starting September 30, 2022 A.R.S. § 32-4153(23) will become effective. The statute makes it a violation of law to perform dry needling before meeting the standards the Board has set in rule. Therefore, the Board may take disciplinary action against a licensee that fails to comply with the statute. The possible disciplinary action includes all actions listed in A.R.S. § 32-4156 including,
 - i. Decree of censure
 - ii. Restricted license and probation
 - iii. Suspension of license
 - iv. Revocation of license
 - v. Refusal to issue or renew a license
 - vi. Civil penalty of not more than \$10,000.00 per violation
 - vii. Voluntary surrender of a license