



KENTUCKY STATE BOARD of PHYSICAL THERAPY  
9110 Leesgate Road, Suite  
Louisville, Kentucky 40222-5159  
<http://pt.ky.gov>

July 18, 2000

Mr. Paul Frederick, MA, PT, CSCS  
Physical Therapy Specialists PSC  
4121 Shelbyville Road 2<sup>nd</sup> Floor  
Louisville, KY 40207

Re: Opinion and Declaratory Ruling regarding state law governing the scope of practice of physical therapy by the Kentucky State Board of Physical Therapy

Dear Mr. Frederick:

This correspondence is in response to your letter dated May 26, 2000, asking for an opinion from the Kentucky State Board of Physical Therapy on whether finger prick blood draws are within the scope of practice of a physical therapist. The Board took up this matter at the next regularly scheduled meeting of the Board after receipt of your letter.

Please keep in mind that this correspondence is an opinion of the Board based solely on the facts you have presented, which will be summarized below. The Board has authorized this opinion to you as an Opinion and Declaratory Ruling pursuant to KRS 13A.130(3) and KRS 13A.010(2)(b) as the agency with jurisdiction to interpret the statutes and regulations governing the practice of physical therapy in the Commonwealth of Kentucky.

**I. Whether finger prick blood draws are within the scope of the practice of physical therapy.**

The Board is presented with the question whether the "finger prick blood draws" are within the scope of the practice of physical therapy. You have presented no other facts in support of your question except identifying the issue of a physical therapist's "ability to perform finger prick blood draws in our [physical therapy] practice."

The relevant part of the extensive statutory definition, KRS 327.010(1), of "physical therapy" includes "invasive or noninvasive procedures with emphasis on the skeletal system, neuromuscular and cardiopulmonary function, as it relates to physical therapy." The Board is of the opinion that a "finger prick blood draw" is an "invasive

procedure” and within the scope of practice of physical therapy as defined by statute, KRS 327.010(1), above.

However, this is heavily qualified by limitation in the statute since the “invasive procedure” must “relate to physical therapy.” The Board cannot define every conceivable medical reason why a “finger prick blood draw” would be necessary and would thus relate to the physical therapy needs of the patient. However, blood glucose levels or other blood measurements may relate directly to a patient’s physical therapy treatment needs as defined in the physical therapy plan of care.

Be also advised that while “finger prick blood draws” are within the scope of practice of physical therapy, with the limitation that the finger prick must be related to the physical therapy needs of the patient, any physical therapist may only provide services within the physical therapist’s competency. Performing a procedure outside the scope of competency of a physical therapist subjects the physical therapist to discipline by the Board. Further, any physical therapist must adhere to universal precautions to prevent the transmission of blood borne pathogens. Again, failure to follow universal precautions subjects the physical therapist to discipline by the Board.

## **II. Conclusion.**

As the agency authorized by the Kentucky General Assembly to regulate the practice of physical therapy in this state, the Board is empowered to interpret its statutes and regulations. In summary, “finger prick blood draws” are within the scope of the practice of “physical therapy” as defined by KRS 327.010(1) only if “related to the practice of physical therapy” and the physical therapy needs of the patient. Finally, the physical therapist must be competent to perform this particular procedure and must adhere to universal precautions.

Sincerely yours,

Kentucky State Board of Physical Therapy

By:

Barbara J. Bruening, P.T., Chair

cc: Board members