

Written Testimony in Opposition to HB 3824
Submitted by: Dr. Danielle Reghi, DACM, LAc
To: Oregon Senate Committee on Health

Dear Members of the Senate Health Committee,

I am writing to express my strong opposition to HB 3824 due to serious concerns regarding patient safety, scope of practice infringement, and the lack of educational and regulatory oversight included in this bill.

While there are several troubling elements in the proposed legislation, I am particularly concerned with the language found in **Page 3, Section 9**, which includes the addition of “**needle insertion**” to the scope of practice for physical therapists.

Let me be clear: what is being described as “needle insertion” is more commonly known in practice as **dry needling**—a procedure that is functionally and legally considered acupuncture. Dry needling involves the insertion of acupuncture needles into muscle motor points to create a physiological response. It is, by definition, a form of acupuncture.

Under Oregon law, acupuncture is defined as:

“An Oriental health care practice used to promote health and to treat neurological, organic or functional disorders by the stimulation of specific points on the surface of the body by the insertion of needles.”

This is exactly what dry needling entails—only rebranded. Moreover, **muscle motor points targeted during dry needling are often acupuncture points**, described using different terminology.

The concern here is not about inter-professional conflict—it is about **educational standards, patient safety, and regulatory accountability**. Acupuncturists in Oregon are required to complete over **2,500 hours of formal education**, pass **three national board exams**, and maintain licensure under the **Oregon Medical Board**, which enforces strict guidelines for safety, ethics, and professional conduct.

In contrast, physical therapists seeking to perform dry needling can complete weekend seminars lasting as little as **27–30 hours**, often with no standardized testing or clinical competency requirements. Even more concerning is that HB 3824, as written, does not require **any minimum education or training** in needling for PTs, nor does it establish an independent, non-partisan oversight body to ensure public safety.

The bill proposes that the **Physical Therapy Licensing Board**, which is not a neutral body, oversee this significant expansion of scope. This raises further concerns about regulatory bias and lack of medical accountability. By comparison, acupuncturists are governed by the Oregon Medical Board—a body not comprised of acupuncturists—which adds a layer of objectivity and public protection.

There is also legal precedent on this issue. In 2017, a judge ruled that dry needling is not within the physical therapy scope of practice. HB 3824 directly contradicts that ruling by allowing PTs to perform a clearly defined medical procedure without meeting the standards applied to acupuncturists or other needle-based modalities.

While acupuncture is generally very safe, **the risk is not zero**. Poor technique and insufficient training can result in serious complications, including **nerve damage, soft tissue trauma, and pneumothorax**. Patients have the right to assume that any provider performing a needle-based intervention is fully educated, trained, and regulated.

In summary, HB 3824 threatens patient safety, undermines Oregon's established regulatory framework, and weakens the integrity of healthcare professions by allowing invasive procedures without sufficient training or oversight. I urge the committee to amend or strike the needle insertion provision from this bill to protect Oregon patients and uphold responsible, evidence-based medical practice.

Thank you for your time and thoughtful consideration.

Sincerely,
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