

Kailashi Zigler L.Ac., Owner of Sunstone Medicine
Licensed Acupuncturist in Portland, Oregon

Dear Members of the Committee,

I am writing in strong opposition to any legislative proposal that would expand the scope of practice for physical therapists in Oregon to include “**needle insertion**” — a practice more commonly referred to as **dry needling**.

As a licensed acupuncturist with over 3,000 hours of specialized training in acupuncture technique, anatomy, safety, and clinical application, I am deeply concerned about the risks to patient safety and public trust that would result from allowing physical therapists to perform invasive needling procedures with only a **weekend seminar or minimal continuing education hours**.

Acupuncture techniques that dry needling is modeled after, involves **inserting solid filiform needles into muscle, nerve, and fascial structures — often deeply and near critical anatomy**. Licensed acupuncturists undergo years of intensive training to learn:

- How to safely palpate and needle deep musculature
- How to avoid, recognize, and manage adverse events (e.g., pneumothorax, nerve damage, bleeding)
- How to understand both eastern and western anatomical frameworks that inform safe and effective needle technique

In contrast, physical therapists are advocating for needle insertion privileges with **no requirement for standardized, accredited training**, and without adequate oversight by a professional regulatory body with experience in needle-based care.

It is irresponsible and dangerous to allow practitioners with **minimal needling education** to perform procedures that can cause serious harm. Dry needling has already resulted in injuries nationwide, including punctured lungs, hematomas, and nerve damage — nearly all of which occurred **in contexts where practitioners lacked the depth of education required for safe needle handling**.

This is not a turf war — it’s a **public safety issue**. Physical therapists are highly skilled in their discipline, but dry needling is an invasive technique that simply does not fall within their foundational education or training. If they wish to incorporate needling into their treatment, the appropriate path is to pursue licensure in acupuncture.

I respectfully urge you to reject any proposal that would allow physical therapists or any other profession to add needle insertion to their scope of practice without meeting the same training, safety, and licensure standards required of acupuncturists in Oregon.

Thank you for protecting patient safety and upholding the standards of care in our state.

Sincerely,

Kailashi Zigler