

Submitter:

Maddie Foley

On Behalf Of:

Committee:

Senate Committee On Health Care

Measure, Appointment or Topic:

HB3824

I am writing as a concerned constituent and licensed healthcare provider to express my opposition to any proposed legislation that would legalize dry needling by physical therapists or other non-acupuncturist providers in the state of Oregon without requiring sufficient and standardized training. My issue is not so much with dry needling as a practice; the concern here is the subversive way in which a scope of practice change is being implemented with no language designating basic requirements to ensure competency, training and safety.

Dry needling involves the insertion of filiform needles into muscle and connective tissue — the same tools and techniques utilized in acupuncture, a complex system of medicine that is rooted in thousands of hours of clinical and theoretical education. While proponents of dry needling often attempt to distinguish it from acupuncture, the truth is that both practices involve the invasive insertion of needles into the body, and therefore carry safety risks when performed improperly.

Licensed acupuncturists in Oregon are required to complete a master's or doctoral-level program with over 3,000 hours of education, including detailed study of anatomy, physiology, pathology, needling technique, and supervised clinical training. In stark contrast, dry needling certification programs for physical therapists often involve as little as 20 to 100 hours of weekend training, with no standardized curriculum or independent licensing exam. This discrepancy is alarming, especially when we consider the risks of improper needling, including pneumothorax (collapsed lung), nerve damage, infection, and other serious adverse events. Certainly, physical therapists have a wealth of anatomical knowledge that would actually make them fine candidates to adopt dry needling as a practice. But to act like dry needling is not the same as acupuncture is simply false and there should be adequate training for any acupuncture adjacent practice considering the risks involved.

If dry needling is to be practiced safely and responsibly in our state, it must be regulated with clear oversight that is comparable to the regulations for acupuncture. Dry needling is acupuncture. At present, such regulatory safeguards are not in place, and granting legal permission for undertrained providers to perform invasive needling techniques is not only medically irresponsible — it is a public health concern.

I urge you to amend this bill, or oppose it, unless it includes rigorous, evidence-based training standards that prioritize patient safety. Oregonians deserve healthcare that is both effective and safe, and expanding the scope of invasive procedures without adequate education sets a bad precedent that will likely hurt patients seeking pain

relief.