

Submitter: Kristy Arneson
On Behalf Of:
Committee: Senate Committee On Health Care
Measure, Appointment or Topic: HB3824

Dear Members of the Senate Health Committee,

My name is Kristy Arneson, and I am a licensed chiropractor in Oregon with an additional degree in acupuncture. I am writing in strong opposition to HB 3824, particularly its inclusion of “needle insertion” within the scope of physical therapy.

While I entered acupuncture school with a robust background in anatomy from my chiropractic education, it became clear early in my training that safe and effective needle insertion requires much more than anatomical knowledge alone. The rigorous acupuncture curriculum—spanning thousands of hours of didactic and clinical instruction—taught me that precise needle depth, angle, and location are critical to preventing harm and achieving therapeutic benefit. These are competencies that cannot be safely acquired in the abbreviated coursework commonly offered in dry needling certification.

Dry needling often targets myofascial trigger points, many of which are located in anatomically high-risk areas. For example:

- Numerous trigger points are located directly over the apex of the lung, increasing the risk of iatrogenic pneumothorax.
- Others are positioned along major nerve pathways, where improper depth or angle can result in nerve damage or neuropathy.
- Many trigger points coincide with acupuncture points that are contraindicated during pregnancy, such as LI4, SP6, BL60, and others. In untrained hands, needling these points can pose serious risks to fetal health.

As someone with dual training, I understand and respect both the power and potential danger of inserting needles into the human body. The techniques used in dry needling are not fundamentally different from those used in acupuncture—they are the same tools, targeting many of the same anatomical structures, and carrying the same risks. To permit providers without acupuncture licensure to perform this procedure would be a serious compromise in patient safety, as well as a violation of the standards set forth in ORS 677.759 and ORS 677.757.

Oregon has long upheld strong regulatory protections around acupuncture to ensure the safety of its residents. Expanding “needle insertion” to physical therapists who are not licensed or trained to the same standard is a regulatory loophole that endangers the public and undermines the integrity of the health professions.

For these reasons, I respectfully urge you to remove “needle insertion” from HB 3824.

Thank you for your time and consideration.