

Dear Members of the Senate Committee on Health Care,

My name is Catherine M. Gurski. I am a Naturopathic physician and licensed acupuncturist in Portland, Oregon. I oppose HB 3824, specifically the inclusion of “needle insertion” (Page 3, Line 37) in the physical therapy scope of practice. The term refers to dry needling, a technique that uses acupuncture needles to penetrate the skin and stimulate muscle or nerve tissue—functionally equivalent to acupuncture, as defined in Oregon law.

Under ORS 677.757(1)(a), “acupuncture” is explicitly defined as the stimulation of specific points on the body “by the insertion of needles”. The statute further affirms that acupuncture includes the use of electrical or mechanical devices with or without needles, which are also marketed under dry needling protocols. This creates both legal and regulatory conflicts.

In Oregon, acupuncture may only be practiced by those licensed under the Oregon Medical Board, under ORS 677.759. Unauthorized practice of acupuncture—including any unlicensed needle insertion—is considered the unauthorized practice of medicine under ORS 677.765 and is subject to penalties.

This bill therefore directly conflicts with established state law by proposing to allow non-OMB-regulated practitioners (physical therapists) to perform a procedure that falls squarely within the legal definition of acupuncture.

I have completed two four year medical graduate programs, a doctorate in Naturopathic Medicine and a Master’s of Science in Oriental Medicine and Acupuncture. My master’s education included classroom instruction, written and practical exams. Additionally, educational requirements included two years of classroom needle insertion and safe practices, two years observation in the clinic and, one year of clinical training overseen by a Doctor of Chinese medicine. To acquire my acupuncture license, I also completed and passed national board exams for Chinese medicine and acupuncture.

If Physical Therapists would like to add “dry needling,” the insertion and manipulation of needles into the skin, then they should be required to complete a full acupuncture program which includes classroom training, observation, practice, safety and board exams. To neglect this devalues the educational requirements and training that licensed acupuncturists must complete under current Oregon state laws. It also is a disservice to the public, who most likely will not understand any differences in training requirements.

The Acupuncture Advisory Committee established in ORS 677.780–785 was specifically tasked with recommending standards for education, licensure, and scope of practice in order to protect the public. HB 3824 undermines this structure by bypassing OMB oversight entirely.

Sincere Regards,
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