

Submitter: Tara Kim

On Behalf Of:

Committee: Senate Committee On Health Care

Measure, Appointment or Topic: HB3824

Thank you for the opportunity to share my perspective on HB 3824A. I'm currently a student of Chinese Medicine and Acupuncture in Oregon, and I'm writing with deep concern for how this bill could impact both patient safety and the integrity of healthcare regulation in our state.

While HB 3824A appears to modernize physical therapy practice by expanding authority in areas like vaccine administration and use of imaging, its language—especially allowing vaccine administration to those “under the care of a physical therapist for the purposes of physical therapy”—raises red flags. It opens the door for future scope expansions into invasive procedures like dry needling, which may not be explicitly named but are part of a national trend of incremental encroachment into acupuncture practices.

Dry needling, despite the terminology, involves inserting filiform needles into muscle tissue—something I'm currently receiving rigorous training in as part of my acupuncture education. Techniques like this require not only detailed anatomical knowledge, but also supervised clinical training to prevent serious risks like pneumothorax, nerve damage, and infection. These aren't theoretical dangers; they've been documented in both research and real-world outcomes, including in recent studies published as recently as 2024.

In contrast to the thousands of hours of education and board-certified training required of licensed acupuncturists in Oregon, physical therapists can receive dry needling certification in a weekend course with minimal oversight and no standardized national credentialing. That disparity puts patients at risk and undermines the standards that currently protect the public.

What's more, vague legislative language—especially involving invasive procedures—sets a troubling precedent. Once the door is opened to insertive techniques without clear, enforceable training requirements, it becomes difficult to contain future expansions that blur professional boundaries and reduce accountability.

If physical therapists want to perform needling techniques, the path is already clear: they can pursue licensure in acupuncture through established programs and regulatory channels. That's how we maintain safety, clarity, and trust across healthcare professions.

For these reasons, I respectfully urge the committee to reject HB 3824A. Oregon has

long been a leader in integrative care. Let's continue to set that example by holding all healthcare providers to the same high standards when it comes to patient safety and professional competence.

Thank you for your time and consideration.

Respectfully,  
Tara Kim