



K o a T r e e H e a l t h

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RE: Opposition to HB 3824 – Inclusion of “Needle Insertion” in PT Scope of Practice

Dear Chair Patterson, Vice-Chair Hayden, and Members of the Senate Health Care Committee:

I am both a physician and acupuncturist and I urge you to oppose HB 3824’s inclusion of “needle insertion” (Section 9, Page 3, Line 37) within the physical therapy scope of practice. This term refers to dry needling, a technique functionally and legally equivalent to acupuncture under ORS 677.757, which defines acupuncture as “the stimulation of specific points on the body by the insertion of needles.” Oregon law reserves this practice for those licensed by the Oregon Medical Board (OMB).

Authorizing physical therapists, who are not regulated by the OMB to perform dry needling directly contradicts current statute and bypasses the Acupuncture Advisory Committee, which was established to set rigorous educational and safety standards. This is not a semantic or turf issue; it is about public safety and regulatory consistency.

Dry needling by physical therapists typically involves only 20–100 hours of training. In contrast, licensed acupuncturists complete 2,500–3,500 hours, including up to 1,000 hours of supervised clinical experience. That discrepancy matters.

Recent studies support the need for reconsidering whether PTs are adequately trained in needling:

- A 2020 prospective study found over 50% of dry needling patients experienced adverse events, with 36.7% of treatments affected and **serious adverse events in 1 of every 1,000 treatments** (Boyce et al., *Int J Sports Phys Ther* 2020).
- By comparison, a 2021 meta-analysis found **acupuncture** adverse events occurred in just **9% of patients**, with serious harm reported in **1 per 10,000 patients** and **fewer than 8 per 1 million treatments** (Bäumler et al., *BMJ Open* 2021).

For these reasons, I respectfully request that “needle insertion” be removed from HB 3824. Patient safety, statutory consistency, and appropriate oversight depend on it.

Thank you for your consideration.

Sincerely,
Dr. Gibran Ramos, ND, LAc