

Submitter: Eric Rosenberg

On Behalf Of:

Committee: Senate Committee On Health Care

Measure, Appointment or Topic: HB3824

I am writing to express my strong opposition to HB 3824 A, specifically the provisions that would expand the scope of practice for physical therapists in Oregon to include interventions involving the use of needles—such as dry needling—without clearly defined educational and safety standards.

As a licensed acupuncturist in the state of Oregon, I have undergone thousands of hours of rigorous, standardized training in anatomy, clean needle technique, and clinical safety protocols. The insertion of needles into the human body is not a benign or low-risk procedure. It requires extensive training to prevent serious complications, including organ puncture, nerve injury, and infection.

HB 3824 A, as currently written, fails to establish any specific educational requirements or credentialing processes for physical therapists who would be authorized to use needles under this expanded scope. This omission is alarming and directly endangers public safety. The bill does not require the kind of comprehensive, hands-on clinical training that acupuncturists must complete before being licensed to practice.

Furthermore, this scope expansion is not supported by the current national physical therapy curriculum, which does not include the depth of training necessary for safe needle use. Allowing a different profession to adopt invasive procedures without holding them to equivalent standards sets a dangerous precedent and undermines the regulatory integrity of Oregon's healthcare system.

This is not an issue of professional competition—it is a matter of patient safety, ethical standards, and professional accountability. If the legislature intends to allow physical therapists to incorporate needle-based modalities into their practice, there must be explicit, rigorous educational and competency standards written into the law to protect the public.

I urge you to either remove needle-related provisions from HB 3824 A or amend the bill to include clear requirements for additional training, certification, and oversight. Oregon's healthcare system should uphold the highest standards—not lower them.

Thank you for your time and consideration.