

Submitter: Crystal Pakizer
On Behalf Of:
Committee: Senate Committee On Health Care
Measure, Appointment or Topic: HB3824

Testimony in Strong Opposition to HB 3824: Protecting Oregon Patients and Upholding the Law

Crystal Pakizer, Estacada, OR

Chair and Members of the Committee,

Thank you for the opportunity to speak today. My name is Crystal Pakizer, and I am here not just as a student acupuncturist, but as a passionate advocate for patient safety and the integrity of healthcare in Oregon. I urge you to reject the inclusion of “needle insertion” in HB 3824 for three critical reasons: it is legally indefensible, it puts patients at risk, and it undermines the standards that protect all Oregonians.

1. Legal Clarity and Integrity

Oregon law is crystal clear: “needle insertion” is acupuncture, and only those licensed by the Oregon Medical Board are permitted to perform it. HB 3824 attempts to sidestep this definition, opening the door for unqualified practitioners to perform a medical procedure that state law reserves for highly trained professionals. This is not just a technicality-it is a fundamental breach of public trust and a direct contradiction of the statutes that safeguard our communities. If we allow this bill to pass, we are telling Oregonians that their safety and the rule of law are negotiable.

2. Patient Safety Is Not Optional

Acupuncture is not simply the act of inserting a needle. It is a complex, nuanced medical practice that requires thousands of hours of education and hands-on clinical experience. Licensed acupuncturists in Oregon complete up to 3,500 hours of rigorous training. In contrast, physical therapists may receive as little as 20 hours before performing “dry needling”-a procedure identical in technique and risk to acupuncture.

The consequences are real and alarming. Published research shows that when dry needling is performed by inadequately trained providers, the rate of serious adverse events skyrockets:

- Up to 36.7% of dry needling treatments result in complications, including life-threatening injuries like pneumothorax and nerve damage.
- Case reports document hospitalizations and permanent harm, all because the practitioner lacked the depth of training required by law for acupuncturists.

Are we prepared to accept a higher rate of injury, hospitalization, and even death, just to expand a scope of practice? Oregon patients deserve better.

3. Undermining Oversight and Standards

The Oregon Medical Board and its Acupuncture Advisory Committee were established for a reason: to set and enforce rigorous standards that protect the public. HB 3824 would bypass these safeguards entirely, allowing physical therapists to perform invasive procedures without the same level of oversight, accountability, or

continuing education.

This is not just a slippery slope-it is a dangerous precedent that threatens the integrity of all licensed healthcare professions in our state.

A discipline that requires four years of intensive study-encompassing foundational medical theory, clinical skills, and ethical practice-should not be handed over to another modality without equivalent training and understanding. This level of professional education is essential for practitioners to develop deep scientific knowledge, evidence-based decision-making, and the ability to navigate complex patient care scenarios safely and competently.

Such rigorous training ensures practitioners are well-versed in anatomy, physiology, pathology, and the nuanced therapeutic approaches unique to their field, all of which are critical for optimal patient outcomes and minimizing risk. Handing over specialized procedures to those without this depth of training compromises both patient safety and the integrity of care, as shortcuts in education cannot substitute for the comprehensive, years-long preparation required to master a complex medical discipline.

Conclusion: Do Not Compromise on Safety or the Law

Inclusion of "needle insertion" in HB 3824 is not just a policy debate-it is a matter of public health, legal integrity, and professional ethics. I urge you, in the strongest