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On Behalf Of:	
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Patient safety—not professional politics—must be the priority. Any provider performing invasive procedures should be held to the same standards of safety and competence, regardless of their professional background. Scope expansions should be grounded in clear need, backed by evidence, and accompanied by rigorous training standards. HB 3824A, as written, leaves room for regulatory overreach and circumvents oversight, opening the door to future procedural encroachments— particularly invasive techniques—without requiring the education necessary to ensure patient safety.

Dry needling is one such example. Despite being an invasive procedure involving the insertion of needles into the body, many dry needling certifications for physical therapists consist of as little as 27 contact hours over a weekend (Structure & Function Education, 2024). There is no national licensure or standardized competency assessment for dry needling. In stark contrast, licensed acupuncturists in Oregon must complete over 3,000 hours of education and clinical training, pass national board exams, and demonstrate proficiency in clean needle technique under direct supervision.