

Submitter: Michael Caloz
On Behalf Of:
Committee: Senate Committee On Health Care
Measure, Appointment or Topic: HB3824

Dear members of the senate committee on health care,

I am writing to express my concern regarding House Bill 3824, which contains language that would dramatically and inappropriately expand the scope of practice for physical therapists to include acupuncture and other needle-based therapies without adequate training or education.

While the bill appears on its surface to address vaccination administration by physical therapists, the actual language in Section (9)(b) surreptitiously introduces "needle insertion" as a permitted treatment intervention within the physical therapy scope of practice. This broad and vague terminology would effectively permit physical therapists to practice acupuncture without completing the rigorous education and training required of licensed acupuncturists.

For context, licensed acupuncturists typically complete:

- 4-5 years of specialized education
- 3,000+ hours of accredited training
- Extensive clinical supervision
- Comprehensive board examinations
- Continuing education requirements

In stark contrast, physical therapists seeking to perform "dry needling" or similar techniques often complete only a weekend course or brief certificate program of 50-100 hours before performing invasive needle techniques on patients. This vast disparity in training presents serious patient safety concerns and undermines established healthcare standards.

The current language in HB 3824 represents an attempt to bypass proper legislative scrutiny and professional standards by embedding significant scope-of-practice changes within seemingly routine legislation. This tactic avoids the thorough debate, stakeholder input, and careful consideration that such a substantial change deserves.

I strongly urge you to:

- 1) Amend the bill to specifically exclude acupuncture and related needle therapies from the physical therapy scope of practice
- 2) Require that any future expansion of scope involving needle insertion undergo proper legislative review with input from all affected stakeholders
- 3) Ensure that any healthcare professional performing acupuncture or similar

techniques meets educational standards comparable to those required of licensed acupuncturists

Patient safety and professional integrity in healthcare should never be compromised through legislative maneuvering. Oregon's citizens deserve care from practitioners who have completed appropriate education for the procedures they perform.

I appreciate your attention to this critical matter.

Respectfully,
Michael Caloz
Counselor