

To: Members of the Oregon Senate Committee on Health Care,

My name is Gavin Ding, a current Traditional Chinese Medicine (TCM) student studying in the city of Portland. I write to urgently oppose HB 3824, specifically the inclusion of “needle insertion” (Page 3, Line 37) within the scope of physical therapy practice. This bill threatens patient safety, undermines professional licensure standards, and contradicts existing Oregon law.

Under ORS 677.757(1)(a), acupuncture is defined as “the stimulation of specific points on the surface of the body by the insertion of needles.” Oregon law further mandates that only practitioners licensed by the Oregon Medical Board (OMB) as acupuncturists or physicians may perform this procedure (ORS 677.759(1)). By permitting physical therapists to insert needles without OMB licensure, HB 3824 directly conflicts with these statutes, effectively sanctioning the unauthorized practice of acupuncture .

The bill also bypasses the Acupuncture Advisory Committee’s role in safeguarding public health through rigorous licensure and educational standards (ORS 677.780–785). Allowing non-licensed practitioners to perform needle insertion sets a dangerous precedent, eroding trust in regulated healthcare professions.

As a TCM student, I am acutely aware of the extensive training required to ensure safe needle insertion. Licensed acupuncturists in Oregon must complete 2,500–3,500 hours of education, including 800–1,000 hours of supervised clinical practice. In contrast, physical therapists often receive only 20–100 hours of dry needling training—a stark disparity that jeopardizes patient safety .

Research underscores the risks of inadequately trained practitioners:

- 36.7% of dry needling treatments result in adverse events, including pneumothorax and nerve injuries (*Brady et al., PM&R, 2014*).
- A Polish study found 3% pneumothorax and 14% nerve palsy rates (*Majchrzycki et al., MDPI, 2022*).
- Case reports document life-threatening complications, such as bilateral pneumothorax (*Şahin et al., JournalAgent, 2020*) .

Dry needling and acupuncture both involve inserting needles into anatomical points, often overlapping in technique and targets . However, physical therapists lack the holistic diagnostic training of TCM, which integrates Qi regulation, meridians, and systemic health—a foundation proven effective through millennia of practice and modern scientific validation .

As a student, I am required to master not only needle techniques but also TCM diagnostics, herbal medicine, and pathophysiology. My curriculum includes hundreds of hours of clinical internships to ensure competency. Allowing physical therapists to bypass this rigor disrespects our profession and endangers patients who assume "needle insertion" is performed by equivalently trained providers .

I urge the committee to remove "needle insertion" from HB 3824. Upholding Oregon's licensure laws and educational standards is critical to protecting public safety and honoring the expertise of licensed acupuncturists.
Thank you for your consideration.

Sincerely,
Gavin Ding
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