

Members of the Senate Committee on Health Care,

My name is Deborah Espesete. I am from Portland, Oregon, and I'm writing in opposition to HB 3824, specifically the inclusion of **"needle insertion"** (Page 3, Line 37) in the physical therapy scope of practice. The term refers to **dry needling**, a technique that uses acupuncture needles to penetrate the skin and stimulate muscle or nerve tissue—functionally equivalent to **acupuncture**, as defined in Oregon law.

The practice of needle insertion comes from the long history of east Asian traditional medicine. A traditional medicine is defined by the World Health Organization as "the sum total of knowledge, skill and practices", and as a traditional medicine, acupuncture is recognized by the WHO for contributing to individual health and well-being within patient-centered healthcare. The practice of needle insertion outside the tradition of acupuncture is an incomplete selection, a cultural appropriation, from a traditional medicine. This partial selection neglects protections and patient safety that are guided by the totality of acupuncture theory as a traditional medicine.

**For these reasons, the term "needle insertion" should be removed from HB 3824.** It is legally inconsistent with Oregon law, compromises patient safety, and bypasses established licensure and oversight standards put in place to protect the public.

Thank you for your time and consideration.

Deborah Espesete, MAcOM, MPH, DiplOM, LAc

World Health Organization's definition and position on traditional medicine:

What is Traditional Medicine?

"Traditional medicine has a long history. It is the sum total of the knowledge, skill, and practices based on the theories, beliefs, and experiences indigenous to different cultures, whether explicable or not, used in the maintenance of health as well as in the prevention, diagnosis, improvement or treatment of physical and mental illness."

World Health Organization. Health Topics: Traditional, complementary and integrative medicine. [https://www.who.int/health-topics/traditional-complementary-and-integrative-medicine#tab=tab\\_1](https://www.who.int/health-topics/traditional-complementary-and-integrative-medicine#tab=tab_1) Copyright 2025. Accessed May 2025.

What is WHO's position on traditional medicine?

"WHO recognizes the diversity of traditional, complementary and integrative medicine (T&CM) practices across countries of the world and its contribution to health, well-being, people-centred health care and universal health coverage. Appropriately integrated T&CM can improve health outcomes by increasing the availability of services, especially at the level of primary health care. Many countries have a long history of traditional medicine and practitioners that are important in providing care to populations, and WHO recognizes that traditional, complementary and alternative medicine has many benefits.

Integration of T&CM with national health system and the mainstream of health care must be done appropriately, effectively and safely, based on the latest scientific evidence.”

World Health Organization. Newsroom: Questions and Answers: Traditional medicine.

<https://www.who.int/news-room/questions-and-answers/item/traditional-medicine>. August 9, 2023. Accessed May 2025.