

Submitter: Lisa Mae Osborn
On Behalf Of:
Committee: Senate Committee On Health Care
Measure, Appointment or Topic: HB3824

Dear Chair Patterson, Vice-Chair Hayden, and Members of the Committee,

I am Lisa Mae Osborn, an acupuncturist of over 25 years in Portland, Oregon. I am writing to voice my strong opposition to HB 3824, specifically the inclusion of “needle insertion” on page 3, line 37, which seeks to expand the scope of practice for physical therapists. This is dangerous and unsafe for the public.

This provision also poses other serious legal, ethical, and patient safety concerns, as it directly conflicts with existing Oregon law, undermines established regulatory oversight created by this body and the Oregon Medical Association, and significantly lowers standards for invasive medical procedures.

My concerns relate to the risk associated with untrained persons utilizing specialized, invasive tools without proper training. Wielding needles of any kind is not a low-risk intervention, and involves insertion into muscles, joints, and anatomical regions located near vital structures such as the lungs, major blood vessels, and nerves. Improper technique can cause serious complications—including pneumothorax, nerve damage, and vascular injury to name a few. I have seen some very frightening things as it relates to untrained people using needles when not trained properly. Licensed acupuncturists in Oregon undergo 2,500–3,500 hours of training, including over 800 hours of supervised clinical practice. In contrast, dry needling certification courses for physical therapists typically range from just 20 to 100 hours. Lowering the training standard for such invasive procedures jeopardizes patient safety and devalues the protections currently in place. This places my profession in jeopardy as well, in the sense that when adverse events occur using my tools in untrained hands, the public begins to mistrust the tool in ANY hands.

My second concern is that this is in direct conflict with Oregon statutes already in place, and I can't imagine why this body would want to undermine itself in this way. HB 3824 conflicts with Oregon law in several ways: Under ORS 677.757(1)(a), acupuncture is defined as the stimulation of specific points on the body “by the insertion of needles.” ORS 677.759 requires that only individuals licensed by the Oregon Medical Board may perform acupuncture, and ORS 677.765 states that unlicensed practice constitutes the unauthorized practice of medicine.

Dry needling—as described in HB 3824—is functionally identical to acupuncture under Oregon law. Allowing physical therapists, who are not regulated by the Oregon Medical Board, to perform needle insertion, would therefore be inconsistent with current statutes and would suddenly, with the stroke of a pen rather than rigorous

training, allow them to be considered untrained and unlicensed acupuncturists. This deeply jeopardizes the safety of the public.

I urge you to oppose this bill outright, it is unsafe and problematic and in conflict with current statutes for Oregon.

Thank you,
Lisa Mae Osborn
M.S., L.Ac.