I am writing to strongly oppose the "needle insertion" language in House Bill 3824.

Allowing physical therapists to perform dry needling without comprehensive education, clinical training, or regulation by the Oregon Medical Board puts patients at serious risk. Needle insertion is acupuncture and requires extensive education — over 2,500 hours — not a short weekend course.

Dry needling has been associated with serious adverse outcomes including pneumothorax, nerve injury, and hospitalizations.

This bill:

- Conflicts with ORS 677.761
- Undermines the authority of the Oregon Medical Board
- Puts patient safety in jeopardy

Please amend HB 3824 to **remove "needle insertion"** from the physical therapist scope of practice. Only licensed acupuncturists regulated by the Oregon Medical Board should perform this invasive procedure.

Thank you for protecting Oregon patients and maintaining our high standards of care.

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