Submitter:	Jennifer Minor
On Behalf Of:	
Committee:	Senate Committee On Health Care
Measure, Appointment or Topic:	HB3824

Please OPPOSE HB 3824, for the safety of patients! This bill does not require adequate training for physical therapists to safely perform needling techniques and uphold the basic standard of medicine to "do no harm."

For reference, licensed acupuncturists in Oregon must complete 2,500 to 3,500 hours of training, including 800–1,000 hours of supervised clinical education. This FAR exceeds the 20–100 hours of training typically offered in dry needling courses for physical therapists. This discrepancy has serious implications for patient safety.

Numerous studies highlight increased risks of adverse events when dry needling is performed by inadequately trained providers:

36.7% of dry needling treatments resulted in adverse events, with 20 major complications such as pneumothorax and nerve injury. Major Complications were 1 per 1,024 TDN treatments, The average ratio of minor AE's for all respondents across all weeks was 0.53 or approximately one event for every two patients (Boyce et al., Int J Sports Ther, 2020).

A Polish study reported 3% pneumothorax, 14% nerve palsy, and 1% hospitalization (Majchrzycki et al., MDPI, 2022).

Multiple case reports confirm life-threatening events, including bilateral pneumothorax and prolonged nerve damage (S,ahin et al., JournalAgent, 2020; Western Journal of Emergency Medicine, 2013).

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.