

Submitter: Marc Curley  
On Behalf Of:  
Committee: Senate Committee On Health Care  
Measure, Appointment or Topic: HB3824

Members of the Senate Committee on Health Care,

My name is Marc Curley, and I live in Vancouver, Washington, though I plan to work in both Oregon and Washington after I graduate in August 2025 as a licensed acupuncturist.

I am writing in strong opposition to HB 3824, particularly the inclusion of “needle insertion” (Page 3, Line 37) in the physical therapy scope of practice. Needle insertion, commonly referred to as dry needling, is functionally equivalent to acupuncture as defined under ORS 677.757(1)(a)—a procedure that involves penetrating the skin with needles to stimulate muscle or nerve tissue.

What sets acupuncture apart is the rigorous training and safety standards required by law. As part of my education, I am completing 2,500 to 3,500 hours of comprehensive training, including 800–1,000 hours of supervised clinical education. This extensive preparation ensures that licensed acupuncturists have the anatomical knowledge, diagnostic skill, and clinical judgment to use needles safely and effectively.

In contrast, dry needling courses offered to physical therapists typically range from 20 to 100 hours, which falls dramatically short of what is required to ensure patient safety. This discrepancy is not just academic—it has real consequences. Research shows significant rates of adverse events associated with dry needling performed by undertrained providers, including pneumothorax, nerve injury, and even hospitalization.

As a future health care provider, my top priority is and always will be patient safety. Expanding needle insertion privileges to professionals without equivalent training undermines that principle and conflicts with Oregon’s existing medical regulations. It also risks exposing the public to harm while sidestepping the oversight designed to prevent it.

For these reasons, I respectfully urge you to remove the term “needle insertion” from HB 3824. Thank you for your time and commitment to protecting Oregon patients.

Sincerely,  
Marc Curley  
Vancouver, Washington