

Submitter: Nora Grod  
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:

My name is Nora Grod, and I live in Portland, Oregon. I am writing in 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 provision poses serious legal, ethical, and patient safety concerns. It also directly conflicts with existing Oregon law, undermines established regulatory oversight, and significantly lowers standards for invasive medical procedures.

#### Needle-Based Procedures Require Precision and Extensive Training

Needling is not a low-risk intervention. It often 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.

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.

The American Academy of Medical Acupuncture (AAMA) states: Therefore, the AAMA strongly believes that, for the health and safety of the public, this procedure should be performed only by practitioners with extensive training and familiarity with routine use of needles in their practice and who are duly licensed to perform these procedures, such as licensed medical physicians or licensed acupuncturists. In our experience and medical opinion, it is inadvisable legally to expand the scope of physical therapists to include dry needling as part of their practice.

The American Medical Association (AMA) states: Our AMA recognizes dry needling as an invasive procedure and maintains that dry needling should only be performed by practitioners with standard training and familiarity with routine use of needles in their practice, such as licensed medical physicians and licensed acupuncturists.

The American Academy of Physical Medicine and Rehabilitation (AAPMR) states: The American Academy of Physical Medicine and Rehabilitation recognizes dry

needling as an invasive procedure using acupuncture needles that has associated medical risks. Therefore, the AAPMR maintains that this procedure should only be performed by practitioners with standard training and familiarity with routine use of needles in their practice, such as licensed acupuncturists or licensed medical physicians.

I respectfully urge the committee to amend HB 3824 and remove all references to “needle insertion.”