5/8/2025

RE: Opposition to House Bill 3824 – Acupuncture by Physical Therapists

To Whom it May Concern;

As a licensed acupuncturist and dedicated healthcare provider in Oregon, I write to express my strong opposition to House Bill 3824, which would permit physical therapists to perform acupuncture under the term "dry needling" or otherwise, without meeting the comprehensive education and training standards required of licensed acupuncturists.

Acupuncture is a powerful form of medicine rooted in thousands of years of history and rigorous clinical application. In the United States, licensed acupuncturists complete a minimum of 3,000 hours of graduate-level education, including extensive training in anatomy, physiology, needling technique, diagnosis, and safety. In contrast, most physical therapy dry needling courses consist of only 20–100 hours of weekend instruction—an amount that falls drastically short of what is required to ensure patient safety and effective treatment.

This bill raises several serious concerns:

- **Patient Safety:** The improper use of acupuncture needles, even under another name, can result in punctured organs, nerve injury, infection, and other complications. Without the appropriate level of education and clinical supervision, physical therapists may unknowingly put patients at risk.
- **Public Confusion:** Using the term "dry needling" to perform acupuncture without full licensure confuses patients, misrepresents the therapy, and undermines the distinction between professions.
- **Scope of Practice Integrity:** Expanding physical therapists' scope to include a modality rooted in a different medical tradition sets a dangerous precedent and devalues the standards maintained by the acupuncture profession.

I respectfully urge you to vote **NO** on House Bill 3824 and instead support legislation that upholds professional integrity, prioritizes patient safety, and respects the training of all healthcare providers. Acupuncturists and physical therapists both play essential roles in integrative care, but each profession must operate within its scope of expertise for the benefit of the public.

Thank you for your time and attention to this important matter.

Sincerely, Dr. Kaitlin Leonard, DACM, L.Ac.