

Submitter: Natalia Velazquez
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 Natalia Velazquez, and I live in Portland, Oregon, district 22. 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.

If HB 3824 passes it would allow physical therapist needle insertion, which is currently an occupation procedure of acupuncturist. Acupuncturist who have received 2,500 – 3,500 hours of training to fulfill this requirement. Acupuncturists who have fulfilled several years of education with over 800 hours of supervised clinical practice. Acupuncturist who have gone through rigorous testing to be able to effectively perform these medical procedures. 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. Not only is it dangerous to put this type of medical procedure into the hands of someone untrained, it is absolutely unethical and could cause serious and possible long term health conditions to the patient.

Giving physical therapist this kind of overlap is not only unethical, it conflicts with Oregon State statutes in several ways.

- Under ORS 677.757(1)(a), acupuncture is defined as the stimulation of specific points on the body “by the insertion of needles.”
- ORS 677.759 requires that only individuals licensed by the Oregon Medical Board may perform acupuncture.
- ORS 677.765 states that unlicensed practice constitutes the unauthorized practice of medicine.

Dry needling—as described in HB 3824—is functionally identical to acupuncture under Oregon law. Allowing physical therapists, who are not regulated by the Oregon Medical Board, to perform needle insertion would therefore be inconsistent with current statutes.

Oregon is known for having some of the highest healthcare standards in the nation. Lowering them now is not the Oregon way. This bill would allow invasive procedures without testing, licensure, or clinical competency. 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.

HB 3824's inclusion of "needle insertion" is:

- Legally inconsistent with current Oregon law
- Medically unsafe, given the risks and inadequate training standards
- Regulatorily flawed, bypassing the OMB and Acupuncture Advisory Committee

Above all, it abandons the Oregon standard of patient-first care.

I respectfully urge the committee to amend HB 3824 and remove all references to "needle insertion." Let us uphold Oregon's values—not weaken them.

Thank you for your time and commitment to protecting public safety in Oregon.

Natalia Velazquez