

Submitter: Danielle Reghi  
On Behalf Of: OAA  
Committee: Senate Committee On Health Care  
Measure, Appointment or Topic: HB3824

I gave oral testimony on Tuesday and could not get through it all. Here it is in its entirety.

Chair and members of the committee,

My name is Danielle Reghi. I am a licensed acupuncturist and small business owner in Portland, and I also represent the Oregon Acupuncture Association. I'm here today to express my strong opposition to a specific part of HB 38248—namely, the inclusion of the term “needle insertion” in the body of the bill.

The inclusion of this term effectively paves the way for dry needling to be added to the scope of physical therapy. After reviewing many of the written testimonies submitted by physical therapists in support of this bill, it's clear that dry needling is a central goal—even if the bill does not explicitly use that language. The majority of supporting testimony references the desire to perform dry needling, which raises concern that this bill is a backdoor approach to broaden their scope without naming it directly.

Reading these testimonies, I was disappointed to find that many PTs seem to have outdated or inaccurate understandings of acupuncture. This is disheartening because I am a strong advocate for collaborative care. I have great respect for the field of physical therapy and regularly refer my patients to PTs when appropriate. However, the main barrier my patients face in accessing PT is not a lack of dry needling services—it's that PTs are often booked out for months or do not accept most insurance plans. Access is a problem, but this bill does not solve that problem.

Let's be clear about what dry needling is. It originates from the work of Dr. Janet Travell, who used dry hypodermic needles to treat trigger points. In 2008, physicians Dorsher and Fleckenstein found that 238 of the 255 trigger points listed in Travell's manual correspond directly to classical acupuncture points. These trigger points are part of a broader category in Chinese medicine known as “ashi” points, which have been treated using acupuncture for over 2,000 years.

Modern dry needling now involves the use of filiform needles—acupuncture needles—inserted into these same points, often with electrical stimulation and needle retention. In other words, PTs are using acupuncture tools, on acupuncture points, with acupuncture techniques. Just calling it something different does not change what it is. This is acupuncture.

Yes, dry needling is a subset of acupuncture—we call it orthopedic acupuncture in our field. Acupuncture is a comprehensive system of medicine, and dry needling is one of its techniques. Under Oregon law and precedent, only licensed acupuncturists may perform acupuncture. That standard was upheld by the Oregon Attorney General in 2017.

Acupuncturists in Oregon are licensed and regulated by the Oregon Medical Board, and we are required to complete over 2,500 hours of training and pass multiple board exams. By contrast, the dry needling courses available to PTs are often only 27 to 30 hours long, with no standardized testing or competency evaluation. Also this topic is highly contentious nationally.

Even medical doctors, who already hold licenses to practice medicine, must complete 300 hours of additional training to perform medical acupuncture. Why should physical therapists not be held to a similar standard? Why should they not be subject to the same rigorous oversight that governs other healthcare providers using needle-based interventions?

This bill raises serious concerns about scope of practice overreach, patient safety, and lack of oversight. There are no training requirements written into the bill, and no independent body named to oversee PTs in their use of needle-based therapies. The PT Board is not a neutral regulatory body when it comes to scope expansion.

I urge you to remove the term “needle insertion” from this bill. It is a vague but significant change that has wide-reaching implications for public safety, healthcare standards, and professional integrity in Oregon.