

Submitter: Kirsten Waters
On Behalf Of: Illumination Rock Integrative Medicine
Committee: Senate Committee On Health Care
Measure, Appointment or Topic: HB3824

Dear Members of the Senate Health Care Committee,

My name is Kirsten Isakson Waters, and I've had the honor of serving the Portland community as an acupuncturist for over a decade. I am also the Clinical Director at Illumination Rock Integrative Medicine, a practice dedicated to providing trauma-informed, collaborative care to some of Oregon's most underserved populations. I'm writing to express my strong opposition to HB 3824, which proposes a dangerous and unjustified expansion of scope for physical therapists to perform invasive needling procedures without the education, clinical training, or regulatory oversight required to protect patients.

1. Needling Is Not a Low-Risk Intervention

Needle-based techniques—whether called acupuncture or dry needling—are never benign. They require deep anatomical knowledge and skilled technique to avoid injury to the lungs, nerves, and vascular structures. A small error in angle or depth can lead to serious harm, including nerve damage, vascular injury, or a collapsed lung.

As an Oregon-licensed acupuncturist, I completed over 2,500 hours of formal education, including hundreds of supervised clinical hours specifically focused on safe, effective needling. Allowing other practitioners to perform similar procedures with only a fraction of that training poses a clear risk to patient safety.

2. This Is Deregulation, Not Innovation

Courts in several states have ruled that dry needling falls outside the legal scope of physical therapy. In states where it is permitted, it was typically the result of intense lobbying efforts, not improvements in patient care or clinical outcomes.

Physical therapists outnumber acupuncturists more than six to one, and their professional organizations wield disproportionate influence. But healthcare policy should not be determined by volume of voices—it should be grounded in training, evidence, and patient protection.

3. Don't Undermine Oregon's Healthcare Leadership

Oregon is a national leader in integrative, high-quality, and patient-centered healthcare. Licensed acupuncturists here are among the most extensively trained in the country, and we contribute meaningfully to the management of chronic pain, women's health, mental health, and orthopedic injuries.

Authorizing undertrained practitioners to perform invasive procedures contradicts the very standards that have made Oregon a model for integrative care. We must not compromise quality and safety for convenience or political expedience.

4. True Collaboration Respects Scope and Training

In my clinical work, I regularly collaborate with physical therapists. I refer patients for movement and rehabilitation therapy, and in return, physical therapists refer to me when precise anatomical needling is required. That's how healthcare should work—mutual respect, appropriate referrals, and shared expertise.

What HB 3824 proposes is not collaboration. It's a regulatory shortcut that dilutes professional standards and puts patients at risk.

In conclusion, I urge you to reject HB 3824 in its current form. This bill:

- Introduces invasive procedures without adequate clinical education

- Circumvents Oregon's regulatory safeguards

- Undermines licensure standards that protect the public

- Weakens Oregon's commitment to evidence-based, collaborative care

Please stand with the many providers and patients who believe in safe, high-integrity healthcare. Let's keep Oregon a place where professional training matters, and patient safety comes first.

Thank you for your time and your dedication to protecting the health of our communities.

Warm regards,

Kirsten Isakson Waters, L.Ac.

Acupuncturist and Clinical Director

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