

Opposition to HB3824 – Scope Expansion for Physical Therapists and Assistants

Dr. Bryon Blackwell, DC

Dear Members of the Oregon Legislature,

As a licensed chiropractic physician, I am writing in strong opposition to HB3824, a proposed bill that would dangerously expand the scope of practice for physical therapists and their assistants to include spinal and extra-spinal manipulation, needle insertion, and vaccinations. This bill poses a serious risk to public safety, undermines the integrity of professional healthcare education, and threatens the well-being of Oregon residents.

1. High-Velocity, Low-Amplitude (HVLA) Adjustments Require Extensive, Specialized Training

Chiropractic physicians undergo thousands of hours of doctoral-level education specifically focused on the neuromusculoskeletal system, differential diagnosis, biomechanics, radiology, and spinal adjusting techniques. HVLA manipulation is a powerful clinical tool that demands precise skill, anatomical knowledge, and clinical judgment—not general training.

Physical therapists receive foundational education in movement science and rehabilitative techniques, but do not receive the same depth or duration of training in HVLA manipulation as chiropractors. Extending this privilege to those with inferior education or clinical preparation not only lowers the standard of care, but puts patients at significant risk of neurological injury, vascular compromise, or joint damage when performed incorrectly.

2. Needle Insertion Is a Separate, Regulated Discipline

Acupuncture is a standalone medical system rooted in complex diagnostic theory and meridian-based treatment principles. Licensed acupuncturists complete over 3,000 hours of specialized education, including clean needle technique, anatomical safety, herbal pharmacology, and traditional diagnostics.

Physical therapists and their assistants are not trained in traditional Chinese medicine, energetic diagnosis, or advanced needling technique. Permitting them to insert needles without this knowledge dilutes the discipline, confuses patients, and endangers the public. Accidental organ puncture, nerve injury, or infection are real risks when handled by the undertrained.

3. Vaccination Administration Should Remain Within Properly Trained Medical Domains

Vaccinations require understanding of immunology, emergency response to adverse events, and proper injection techniques. Allowing physical therapists or their assistants—who are not licensed primary care providers or pharmacologically trained clinicians—to administer

vaccines falls outside the ethical bounds of their professional preparation.

4. Public Confusion and Professional Erosion

Restricting terms like “physiotherapy” or “physical therapy” while simultaneously expanding the PT scope dangerously muddies professional boundaries and confuses the public. Patients have a right to know who is treating them, what their qualifications are, and what safety standards are in place.

This bill is not about improving access to care. It is about allowing non-experts to practice outside of their educational competencies, and in doing so, puts the citizens of Oregon at unnecessary risk.

I urge you to reject HB3824. Licensing should be based on rigorous education and training standards—not on lobbying power or professional overreach. Oregon must prioritize safety, integrity, and patient-centered care by upholding the distinctions between licensed healthcare providers.

Sincerely,
Dr. Bryon Blackwell, DC,