

Submitter: Jennifer Talbert

On Behalf Of:

Committee: Senate Committee On Health Care

Measure, Appointment or Topic: HB3824

Statement of Opposition to HB 3824 – Scope Expansion for Physical Therapists

As a licensed chiropractic physician, I write to express qualified opposition to Oregon House Bill 3824. While I support the modernization of physical therapy practice and agree that certain scope expansions—such as prescribing durable medical equipment and limited vaccine administration—may enhance patient access and efficiency, I am deeply concerned about provisions that grant physical therapists the authority to perform dry needling and spinal and extraspinal joint manipulation.

These procedures, when performed without the depth of training required in chiropractic and acupuncture education, pose legitimate risks to patient safety.

Spinal manipulation is a high-velocity, low-amplitude technique involving precise biomechanical assessment and years of specialized education to perform safely and effectively. Similarly, dry needling involves the insertion of solid filiform needles into the body, overlapping significantly with acupuncture. Without comprehensive training in needling depth, anatomy, and clean needle technique, the risk of complications such as pneumothorax, nerve injury, or infection rises sharply.

Both the Oregon Board of Chiropractic Examiners and the Oregon Medical Board of Acupuncture have expressed opposition to these provisions. This is not a matter of professional protectionism—it is about public safety, evidence-based standards, and maintaining the integrity of each profession's specialized expertise.

We are also concerned about the bill's expansion of the definition of physical therapy "testing" to include imaging. While the bill does not clearly grant physical therapists the authority to independently order imaging studies, the inclusion of "imaging" under standard testing methods (Section 9, ORS 688.010(12)) creates ambiguity. If this is intended to allow imaging orders without further legislative clarification or training requirements, it could lead to inconsistent diagnostic use, increased healthcare costs, and potential harm from unnecessary or missed diagnoses.

In summary:

I support targeted scope modernization but oppose the inclusion of spinal manipulation and dry needling without extensive, standardized postgraduate training.

I request clarification regarding physical therapists' authority to order imaging, and

caution against allowing such access without the same clinical training and accountability required of other diagnostic providers.

These changes risk encroaching on other licensed professions, lowering safety standards, and creating patient confusion about provider roles.

We urge lawmakers to amend HB 3824 to remove or revise these high-risk expansions and preserve the integrity of regulated clinical disciplines in Oregon.

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