

Submitter: Stephen Gregory  
On Behalf Of:  
Committee: Senate Committee On Health Care  
Measure, Appointment or Topic: HB3824

I am writing to oppose the "needle insertion" language in House Bill 3824. The proposed language in page 3, section 9 of HB 3824 expands the Physical Therapist scope of practice to include "needle insertion," without further defining the practice, nor expounding upon the minimum educational or regulatory standards. Allowing physical therapists to perform "needle insertion," including dry needling and vaccination, without comprehensive education, clinical training, or oversight puts patients at serious risk. Furthermore, the breadth of the term "needle insertion" opens up the possibility of further encroachment into other needling techniques like auriculotherapy, peripheral nerve stimulation, and more that have traditionally fallen under the scope of practice of licensed acupuncturists or those with extensive medical acupuncture training.

Following ORS 677.757, needle insertion is acupuncture and requires extensive education. Licensed acupuncturists receive over 2,500 hours of clinical education, must pass multiple board examinations, and obtain licensure through the Oregon Medical Board for entry to practice. Dry needling training may be accomplished by as little as a 27-hour weekend course.

I am an Oregon acupuncturist with over 13-years of clinical experience specializing in orthopedics and neurological conditions. I regularly use dry needling within the context of comprehensive acupuncture treatments with positive results. The majority of myofascial trigger points are co-located with well-established traditional acupuncture points, and traditional acupuncture techniques have long included stimulating these points to obtain "de qi" or a muscle twitch response. Dry needling is orthopedic acupuncture.

The current language in HB 3824:

- Conflicts with ORS 677.761
- Undermines the authority of the Oregon Medical Board
- Puts patient safety in jeopardy

Please amend HB 3824 to remove "needle insertion" from the physical therapist scope of practice. Only licensed acupuncturists regulated by the Oregon Medical Board, with much more extensive training, should perform this invasive procedure.

Thank you for protecting Oregon patients and maintaining our high standards of care.

Respectfully,

Stephen Gregory, DACM, LAc