

Dear Chair Patterson, Vice-Chair Hayden, and Members of the Committee:

My name is Alison Mckenzie and I live in Portland, Oregon. I am writing in strong opposition to HB 3824, specifically the inclusion of “needle insertion” on page 3, line 37, which seeks to expand the scope of practice for physical therapists.

Needle-Based Procedures Require Precision and Extensive Training

Needling is not a low-risk intervention. It often involves insertion into muscles, joints, and anatomical regions located near vital structures such as the lungs, major blood vessels, and nerves. Improper technique can cause serious complications—including pneumothorax, nerve damage, and vascular injury.

Licensed acupuncturists in Oregon undergo 2,500–3,500 hours of training, including over 800 hours of supervised clinical practice. In contrast, dry needling certification courses for physical therapists typically range from just 20 to 100 hours. Lowering the training standard for such invasive procedures jeopardizes patient safety and devalues the protections currently in place.

This provision poses serious legal, ethical, and patient safety concerns. It also directly conflicts with existing Oregon law, undermines established regulatory oversight, and significantly lowers standards for invasive medical procedures. I have had many patients over the 10 years of my acupuncture practice tell me of the pain and suffering they endured with “dry needling” from Physical Therapists or Chiropractors in other states that do not require the correct training. I hope that Oregon does not want to join that loose medical environment in allowing medical providers to perform procedures that they were not trained in. If professionals wish to participate with acupuncture techniques, they should attend a school that will properly train them with adequate hours of practice and instruction and get Nationally board certified for Acupuncture, as those of us would be required to if we would like to practice Physical Therapy in the state of Oregon.

HB 3824 Undermines Existing Oversight

The Acupuncture Advisory Committee, established under **ORS 677.780–785**, was created to advise the Oregon Medical Board on standards for acupuncture education, licensure, and scope. HB 3824 bypasses this structure entirely by granting an invasive procedure to a profession not subject to OMB oversight.

This undermines the regulatory system that was carefully designed to protect the public from harm and maintain clinical standards.

HB 3824's inclusion of "needle insertion" is:

Legally inconsistent with current Oregon law

Medically unsafe, given the risks and inadequate training standards

Regulatorily flawed, bypassing the OMB and Acupuncture Advisory Committee

Above all, **it abandons the Oregon standard of patient-first care.**

I respectfully urge the committee to amend HB 3824 and **remove all references to "needle insertion."** Let us uphold Oregon's values—not weaken them. Thank you for your time and commitment to protecting public safety in Oregon.

Alison Mckenzie, Lac, MaCOM