



May 7, 2025

Senate Committee on Health Care  
[testimony.techissues@oregonlegislature.gov](mailto:testimony.techissues@oregonlegislature.gov)  
Oregon State Legislature  
900 Court St. NE  
Salem, Oregon 97301

**RE: OPPOSITION to HB 3824 to Permit Physical Therapists to use Dry Needling**

Dear Senate Committee on Health Care:

The National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM®) is writing to oppose HB 3824 to physical therapists to practice dry needling/trigger point acupuncture/intramuscular therapy. “Dry needling” is an advanced and invasive procedure. In the hands of a practitioner who has received limited and/or substandard training, it has the potential to cause great harm. It can be considered safe only when performed by properly trained and experienced acupuncturists.

As the only certification organization in the U.S. with nationally accredited certification programs in acupuncture and herbal medicine, the NCCAOM is represented by over 21,000 NCCAOM Board-Certified Acupuncturists™ today. Since 1982, the NCCAOM examinations have served as a gateway for the profession of acupuncture, almost all regulated states in United States require the NCCAOM examinations or NCCAOM certification as a prerequisite for state license to practice acupuncture and herbal medicine. Today, the value of NCCAOM’s national examinations and certification is demonstrated by its acceptance in 46 states plus District of which represents 98% of the states that regulate acupuncture.

The mission of the NCCAOM is *to assure the safety and well-being of the public and to advance the professional practice of acupuncture and Oriental medicine by establishing and promoting national evidence-based standards of competence and credentialing.* NCCAOM National Board-Certified Acupuncturists™ have practiced and documented “dry needling”, for decades in the US. Dry needling is an advanced and invasive procedure. In the hands of a practitioner who has received limited and/or substandard training, it has the potential to cause great harm. It can be considered safe only when performed by properly trained and

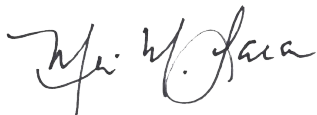
experienced healthcare professionals. NCCAOM National Board-Certified Acupuncturists™ receive hundreds of hours in the core skills required to correctly perform invasive and potentially dangerous needling techniques, assuring their competencies to insert and manipulate acupuncture needles safely.

The practice of acupuncture is more than merely placing needles at various points for different conditions. Assurance of safe and effective therapeutic outcomes from acupuncture treatments relies on having a practitioner who is applying a system of medicine that uses a diagnostic and treatment approach that is significantly different from existing Western medicine practice. It is from such a knowledge base that acupuncture's full efficacy and value can be realized by the public.

The NCCAOM requests that the state of Oregon recognize the need for adequate training and licensing procedures for all health care practitioners. Clearly, acupuncture treatments such as dry needling and other complementary therapies are becoming part of the health care landscape, as evidenced by recent studies and recommendations by the National Institutes of Health. It is the sincere hope of the NCCAOM that, in the interest of public welfare you will maintain current standards preventing physical therapists from performing dry needling/ trigger point acupuncture.

I hope you will find this information valuable. Please also refer to the [NCCAOM Dry Needling Position Statement](#) for additional information and consider the NCCAOM as a resource for current information about the standards of competence and practice within the field of acupuncture and herbal medicine. Please feel free to contact me by phone (703-314-2908) or by email ([mlarson@thenccaom.org](mailto:mlarson@thenccaom.org)) if I can offer further information on this topic.

Sincerely,



Mina M. Larson, M.S., MBA, CAE  
Chief Executive Officer  
NCCAOM®  
2001 K Street NW, 3rd Floor North  
Washington DC 20006