

Submitter: Robert Richards  
On Behalf Of:  
Committee: Senate Committee On Health Care  
Measure, Appointment or Topic: HB3824

My name is Robert M. Richard, D.C., and I am current Vice President of the OCA.

The Oregon Chiropractic Association supports:

- Any willing provider.
- The ability of all professions to practice at the top of their scope of license.
- The ability of any profession to expand their scope with proper education.
- Non-discrimination, inclusion, diversity, equity and parity in insurance, reimbursement, and patient access.
- Public safety.

The OCA does NOT support:

- LIMITING or DIMINISHING scope of practice.
- LIMITING or DIMINISHING access to care.
- LIMITING or DIMINISHING public safety.

Therefore, the OCA is opposed to HB3824 (as written) as it conflicts with existing ORS and would LIMIT and DIMINISH scope of practice of chiropractic and acupuncture.

Current ORS 684.010 (2)(a) Defines chiropractic as:

That system of adjusting with the hands the articulations of the bony framework of the human body, and the employment and practice of physiotherapy, electrotherapy, hydrotherapy, and minor surgery.

As written, HB3824 Section 11, (4) re-defines Physical Therapy as:

Unless physical therapy services are provided by a physical therapist...the entity (chiropractic/acupuncture) MAY NOT USE IN CONJUNCTION WITH ENTITY'S NAME OR ACTIVITIES... "physiotherapy," "physiotherapist," "physio."

HB3824 conflicts with existing ORS and would have the negative effect of LIMITING and DIMINISHING scope of practice of legally defined existing professions.

HB3824 Section 9, (9)(b) Presents a public safety risk by DRASTICALLY expanding the scope of Physical Therapists and Physical Therapy ASSISTANTS beyond their current education and their ability to ATTAIN such education.

- Assess disability: AMA Sixth Edition requires up to 160 hours and 200

## modules

- Needle insertion: wet and dry needles require training and board certification
- Manual therapy including manipulation requires 200 – 2000 hours of training
- Prescription application requires 120 hours minimum 400 maximum.

## Current Total Educational Hours Breakdown

- Chiropractic Education (DC): 3591 academic hours, 1023 clinical hours (4614)
- Osteopathic Education (DO): 2145 academic hours, 2520 clinical hours (4660)
- Doctor Physical Therapy Education (DPT): 1356 academic hours, 1311 clinical hours (2667)
- Medical Doctor Education (MD): 2600 academic hours, 2200 clinical hours (4800)
- Naturopathic Dr. Education (ND): 2100 academic hours 1100 clinical hours (4100)
- Registered Massage Therapist Education (RMT): 2116 academic hours, 635 clinical hours (2751)
- Licensed Massage Therapist Education (LMT): 500 academic hours, 200 clinical hours (700)