

SCAW



Public Protection Through Quality Credentials

March 8, 2010

FTR - SB392

Senator Joseph Crisco
Representative Steve Fontana
Co-Chairs, Insurance & Real Estate Committee

Connecticut General Assembly
Room 2800, Legislative Office Building
Hartford, CT 06106

Re: SB 392 -- an act concerning insurance coverage for acupuncture treatments provided by chiropractors

Dear Senator Crisco and Representative Fontana:

I am writing to comment on proposed SB 392 regarding providing insurance coverage for acupuncture treatments provided by chiropractors. The position of the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM®) is that the proposed insurance mandate would better benefit the medical community and the general public if the bill included acupuncture treatments performed by licensed acupuncturists and therefore is requesting that you end the advancement of SB 392 as it is currently written.

As the only national organization that documents competencies for entry-level practice for the profession of acupuncture through national certification, the NCCAOM believes that SB 392 as it is currently written is not only disadvantageous to the hundreds of licensed acupuncturists practicing in the state of Connecticut, but it is potentially harmful to the interests of your healthcare consumers seeking safe and effective treatment.

The mission of the NCCAOM is to establish, assess, and promote recognized standards of competence and safety in acupuncture and Oriental medicine for the protection and benefit of the public. In order to fulfill this mission, NCCAOM has developed a certification process that provides a unified set of nationally verified, entry-level standards for safe and competent practice of acupuncture and Oriental medicine. The value of NCCAOM's national examinations is demonstrated by its acceptance in 44 of the 45 states that have laws for licensing acupuncturists. This means that 98% of states, which include Connecticut, require NCCAOM examinations as a prerequisite for licensure.

The NCCAOM partners with the states in the important role of protecting the public welfare and as such, works closely with the state regulatory bodies that are charged with overseeing the practice of acupuncture. It is, therefore, very concerning to see the state of Connecticut making the unprecedented move to require insurance coverage for acupuncture treatment by chiropractors and not licensed and certified acupuncturists who have demonstrated thousands of additional hours in clinical and didactic training.



Public Protection Through Quality Credentials
Connecticut General Assembly
3/9/2010
Page 2 of 3

As stated above, no states have mandated insurance coverage for acupuncture treatment by chiropractors exclusively. This is due to the vast difference in education and training of NCCAOM certified and state licensed acupuncturists versus a chiropractor who practices acupuncture as an additional elective modality. In order to qualify for NCCAOM certification, applicants are required to meet extensive academic and supervised clinical practice standards. The following is an outline of the requirements that applicants for NCCAOM Certification in Acupuncture are required to meet:

- Graduate from a formal, full-time school or college master's level acupuncture program accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM). ACAOM is the only agency accredited for this purpose by the United States Department of Education. (Please see www.acaom.org for additional information).
- Complete a minimum of 1,905 hours of entry-level education which represents four years of education. This includes 705 hours of didactic acupuncture and Oriental medicine theory studies along with 670 hours of clinical training. Most acupuncture and Oriental medicine students go on to complete 3,000 hours of didactic and clinical education.
- Complete 450 hours of education in biomedical clinical sciences and pass a separate examination in biomedicine. These hours ensure that an acupuncturist has the necessary skills to know when to refer a patient to a doctor or other healthcare practitioner for a diagnostic examination. In addition, it allows acupuncturists to converse knowledgeably with western medical practitioners.
- And, finally, pass three separate written examinations in acupuncture as well successfully complete a separate clean needle technique course to ensure the safe and proper use and disposing of acupuncture needles.

NCCAOM considers these standards of eligibility, as well as successful performance on the examinations, to be the minimum requirements for the safe practice of acupuncture. Currently, the National Board of Chiropractic Examiners' acupuncture examination requires only 100 hours of acupuncture education and/or training. In our view, 100 hours of education in acupuncture and examination based on such an insufficient education does not represent the training that is necessary for the entry-level competence in acupuncture. By passing a law that only allows chiropractors to receive insurance reimbursement for performing acupuncture treatment as opposed to mandating insurance coverage for acupuncture treatment by licensed acupuncturists with thousands of hours of additional training poses a threat to recognized standards of competence and safety, potentially placing the health and welfare of health care consumers in your state at risk. It also unfairly permits only those consumers who can afford to pay out-of-pocket to receive the full benefits of acupuncture treatment by a licensed and certified acupuncturist.



Public Protection Through Quality Credentials

Connecticut General Assembly

3/9/2010

Page 3 of 3

The practice of acupuncture and Oriental medicine is more than merely placing needles at various points for different conditions. It is completely different system of medicine that treats syndromes of disharmony. Assurance of safe and effective therapeutic outcomes from acupuncture and Oriental Medicine treatments relies on a having a practitioner who is applying a system of functional 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.

NCCAOM is proud of its partnership with the great state of Connecticut in protecting its consumers from the unsafe practice of acupuncture through years of effective regulation. It is for this reason that we must oppose SB 392 as it is currently drafted as it prevents consumers in your state, who wish to receive insurance reimbursement, to seek a highly qualified and fully trained licensed and certified acupuncturist.

Sincerely,

A handwritten signature in cursive script that reads 'Kory Ward-Cook'.

Kory Ward-Cook, Ph.D., MT(ASCP), CAE
Chief Executive Officer

cc: Dort Bigg, JD, Executive Director of ACAOM
Rebekah Christensen, Executive Director of AAAOM