



Public Protection Through Quality Credentials

March 1, 2011

Public Health Committee
Legislative Office Building, Room 3004
Hartford, CT 06106-1591

RE: SB 1052 – An Act Concerning the Practice of Acupuncture

Dear Representative Ritter, Senator Gerratana and Members of the Public Health Committee:

On behalf of the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM[®]), I am writing to comment on proposed legislation SB 1052, which is designed to better define the practice of acupuncture in Connecticut to reflect current practice. The position of the NCCAOM is that this proposed updated definition for the practice of acupuncture represents the most current training, educational and examination requirements that licensed acupuncture and Oriental medicine (AOM) practitioners must fulfill in order to become licensed in Connecticut.

The mission of the NCCAOM is to establish, assess, and promote recognized standards of competence and safety in acupuncture and Oriental medicine (AOM) for the protection and benefit of the public. In order to fulfill this mission, we have developed a certification process that provides a unified set of nationally verified, entry-level standards for safe and competent practice. 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 require NCCAOM examinations as a prerequisite for licensure. The NCCAOM is proud of the fact that we partner with the states in the important role of protecting the public welfare.

In the past, our organization has worked closely with the regulators in Connecticut to ensure that that state's consumers receive safe and effective acupuncture treatment by requiring that each practitioner has fulfilled an extensive educational program and passed a set of rigorous psychometrically validated examinations. This thorough process assures that certified practitioners have the knowledge, skills and abilities to be able to perform the various functions as detailed in the NCCAOM Examination Content Outlines for Foundations of Oriental Medicine, Acupuncture with Point Location and Biomedicine (please see attached). The NCCAOM believes it is crucial that the state codify its present requirements in the Public Health Law for the practice of acupuncture to reflect the current national standards for education, training and assessment of licensed acupuncturists.

It is also important to note that the extent of a licensed acupuncturist's knowledge and education sets them apart even from those who have the right to use acupuncture in their practices. In order to qualify for NCCAOM certification, applicants must meet the following:

- Graduate from a formal master's level acupuncture program accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM). ACAOM is the only agency recognized for this purpose by the United States Department of Education.
- Complete a minimum of 1,906 hours of entry-level education which represents four years of education.
- Complete 510 hours of education in biomedical clinical sciences.
- Pass three separate written examinations: Foundations of Oriental Medicine, Acupuncture with Point Location, Biomedicine. The requirement of passing a separate examination in Biomedicine ensures that an acupuncturist has the necessary skills to know when to refer a patient to a medical doctor or other healthcare practitioner for a diagnostic examination that is outside their scope of practice. In addition, it allows acupuncturists to converse knowledgeably with western medical practitioners and thus assure that there is the best coordination of care for the benefit and safety and benefit of the patient.

The NCCAOM considers these standards of eligibility and successful performance on the examinations, to be the minimum requirements for the safe practice of acupuncture. It is from such a knowledge base that acupuncture's full efficacy and value can be realized by the public and this must be reflected in the state's definition of the profession to include the ability to be able to make a diagnosis of syndromes of disharmony according to the principles of Oriental medicine.

The NCCAOM is pleased to see that the state of Connecticut recognizes the need for adequate licensing procedures for all health care practitioners to include acupuncture. Clearly, acupuncture and other complementary and alternative therapies will be part of the health care landscape in years to come, 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, the Connecticut Legislature will adhere to the most current national standards of professional competence by updating its existing definition of the practice of acupuncture to reflect current practices.

We hope you will find this information valuable. Please consider the NCCAOM as a resource for current information about the NCCAOM eligibility and testing standards, please contact me at kwardcook@thnccaom.org.

Sincerely,



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

cc: NCCAOM Board of Commissioners
Jeannie Kang, American Association of Acupuncture and Oriental Medicine, President