

August 15, 2003

James Mayer
Executive Director
Little Hoover Commission
Suite 805
925 L Street
Sacramento, CA 95814

Dear Mr. Mayer:

This letter is submitted to the Little Hoover Commission on behalf of the Council of Colleges of Acupuncture and Oriental Medicine, a 501(c)(6) nonprofit membership organization representing 46 acupuncture and Oriental medical colleges throughout the United States, 11 of which are located in California. Additionally, training programs at 14 of the Council's college campuses located out of California have been approved by the California Acupuncture Board (see Appendix). The mission of the Council is to advance acupuncture and Oriental medicine (AOM) by promoting educational excellence within the field and by supporting diversity among its member colleges. The Council, which was established in 1982, is a leading voice in the United States concerning acupuncture and Oriental medical education.

The Council urges the Commission to recommend that national standards of accreditation and certification be adopted in California so that California may join virtually every other state in the nation that has an acupuncture practice act in recognizing such standards. The Commission has received separate correspondence from the national accrediting organization in this field, the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM), and from the national certifying organization, the National Commission for the Certification of Acupuncture and Oriental Medicine. This letter will not, therefore, detail the respective qualifications of ACAOM and NCCAOM as reliable agencies to administer national standards of accreditation and certification. Those qualifications are amply documented in the correspondence from these two organizations, both of which have been authoritatively recognized for the administration of national accreditation and certification programs in the AOM field by the U.S. Department of Education for ACAOM and the National Commission for Certifying Agencies of the National Organization for Competency Assurance for NCCAOM.

The AOM field has matured significantly since the early 1970s when acupuncture first began to be regulated in the United States. A significant component of that maturation process has been the adoption of national standards of accreditation and certification by virtually every state that licenses this profession. California has been the most notable exception and the state's continued adherence to its own accreditation and examination processes has resulted in needless extra costs for California schools and students, as well as out-of-state schools that have been approved by the California Acupuncture Board, and further created an impediment to interstate reciprocity for AOM professionals.

The issue of interstate reciprocity is a very important one. The failure of California to adopt national standards inhibits out-of-state AOM practitioners, who may have years of experience and safe and competent practice in this field, from moving into California without taking the California licensing examination. These out-of-state practitioners may desire to relocate to California, for example, to treat an ill parent or relative or in response to the practitioner's marriage or divorce. The practical exclusion of such AOM practitioners by California does not benefit the profession, the public, or the California economy, which would benefit by the influx of additional health care businesses in the state. Additionally, because California has not adopted national certification standards, California AOM practitioners, in order to practice in another state, are also unduly burdened by the necessity of taking a second examination to meet the national certification standards of NCCAOM that are typically recognized by other states. At a time when national standards of accreditation and certification have become the norm in virtually every field of professional health care and when the mobility of health professionals across state lines is increasing, the need for uniform adoption by California of national standards is both obvious and compelling.

While reasonable differences continue to exist in the AOM field about the most appropriate number of educational hours a person needs to become an AOM practitioner or the professional title that a practitioner should have, this debate should not overshadow the overriding need for national standards of accreditation and certification. It is difficult to argue that the 40 states that adhere to national standards in this field are all wrong and that only California's unilateral approach in this area is right.

The Council has consistently promoted the adoption of national standards for the foregoing reasons and, through its own national Clean Needle Technique (CNT) Program, has fostered public safety by offering verification of practitioner competence in this critical area of educational training. The Council's CNT course is required by the NCCAOM as part of its national certification standards, is the only national CNT course in the U.S., and represents the state-of-the art for CNT instruction and standards.

Given the state of the AOM profession today, it simply makes no sense for one state to fail to recognize the prevailing minimum national standards of accreditation and certification, the quality of which are amply confirmed by federal and other external authorities that have approved ACAOM and NCCAOM, as well as by the outstanding safety record the AOM field enjoys. In recognizing such minimum standards, California is not precluded from adopting additional or unique educational standards if the state so desires and ensuring compliance with those standards through a paper review short of a separate in-state accreditation process. The flexibility that California would retain for itself if the state adopts national standards of accreditation and certification are detailed in the correspondence to the Commission from ACAOM and NCCAOM.

In recommending the adoption of national standards in California, the Commission would perform a significant public service by: (1) reducing the existing costs and administrative burden of dual accreditation for California approved colleges,

(2) eliminating the practical need of California AOM students to take multiple examinations in order to practice this profession, and (3) promoting interstate reciprocity for AOM practitioners who wish to relocate to or from California. These are significant benefits and the Commission's recommendations may be expected to carry authoritative weight both in California and nationally.

The Council would like to thank the Commission for taking the foregoing considerations into account.

Sincerely,

David M. Sale
Executive Director

Lixin Huang
President

APPENDIX

Council of Colleges of Acupuncture and Oriental Medicine

(Council Member Colleges Approved by the California Acupuncture Board)

In-State Colleges:

- (1) Academy of Chinese Culture & Health Sciences
Oakland, CA
- (2) American College of Traditional Chinese Medicine
San Francisco, CA
- (3) Dong-guk Royal University of America
Los Angeles, CA
- (4) Emperor's College of Traditional OM
Santa Monica, CA
- (5) Five Branches Institute
Santa Cruz, CA
- (6) Acupuncture and Integrative Medicine College, Berkeley
(formerly Meiji College of Oriental Medicine)
Berkeley, CA
- (7) Pacific College of Oriental Medicine
San Diego, CA
- (8) Samra University of Oriental Medicine
Los Angeles, CA
- (9) Santa Barbara College of Oriental Medicine
Santa Barbara, CA
- (10) South Baylo University
Anaheim, CA

(11) Yo San University of TCM
Santa Monica, CA

Out-of-State Colleges:

(12) Academy of Oriental Medicine at Austin
Austin, TX

(13) American College of Acupuncture and Oriental Medicine
Houston, TX

(14) Bastyr University
Kenmore, WA

(15) International Institute of Chinese Medicine
Santa Fe, NM

(16) Mercy College
Dobbs Ferry, NY

(17) National College of Naturopathic Medicine
Portland, OR

(18) New York College of Health Professions
Syosset, NY

(19) Oregon College of Oriental Medicine
Portland, OR

(20) Pacific College of Oriental Medicine
New York, NY
Chicago, Ill

(21) Southwest Acupuncture College
Albuquerque, NM
Santa Fe, NM
Boulder, CO

(22) Tai Sophia Institute
Columbia, MD