



October 18, 2013

Elaine Wolf Komarow, L.Ac.  
5021 – D Backlick Road  
Annandale, VA 22003

Dear Elaine,

The Acupuncture Society of Virginia (ASVA) values the opportunity to respond to your e-mail dated October 10<sup>th</sup>, 2013. You have touched upon many thoughtful points regarding the core issues our profession faces today, both in the referenced correspondence and your ongoing personal blog, "The Acupuncture Observer." Your longstanding participation in the AOM community and with the Acupuncture Society of Virginia is sincerely appreciated.

In reference to ASVA's comments at the Acupuncture Advisory Meeting in Richmond on October 9<sup>th</sup>, 2013, it may have been an overstatement that the Virginia Acupuncture Advisory Board "reaffirmed NCCAOM certification as the standard for obtaining and maintaining the right to practice as a licensed acupuncturist" at the February 6, 2013 Acupuncture Advisory Board meeting. However, having been present at both meetings, I do not recall discussion of NCCAOM credentialing as being "controversial" and thus "not suitable as part of the fast track review regulatory review." There is no motion on record to reflect such discussion in the minutes from that meeting. Nonetheless, public comment received by the Board of Medicine in support of ASVA's position that Virginia maintain continued NCCAOM certification, and more specifically the stipulation that licensed acupuncturists are required to maintain that certification in order to continue practicing in Virginia, was thoroughly discussed by the Advisory Board.

A portion of ASVA's statement to the Advisory Board on October 9<sup>th</sup> read as follows: "no state that utilizes NCCAOM as a prerequisite to licensure has ever revoked such a standard." Forty three states, including the District of Columbia, require either full certification or the passing of NCCAOM exams as a path to licensure. Please contact NCCAOM directly for information pertaining to your questions regarding "harm to the profession or to the public in states with alternate paths to licensure."

Although you state in your October 10<sup>th</sup> e-mail to ASVA that you "do not have any agenda," it seems possible, based on the numerous inflammatory comments on your blog, that you indeed wish to promote the idea of eliminating NCCAOM certification in Virginia, and to encourage other states to consider "an alternate path to licensure." As one of the items on the posted agenda for the October 9<sup>th</sup> Advisory Board meeting was entitled: "Discussion of an Alternate Path to Licensure Distinct from NCCAOM – Elaine Komarow," it seems worth noting with some degree of concern that you, as the current Advisory Board Chair, are bringing forth topics that so closely reflect your personal opinions.

I hope you find ASVA's Town Hall meeting this weekend, October 19<sup>th</sup>, at the Building Bridges conference, to be informative and helpful to you. Membership feedback is always strongly encouraged. NCCAOM stakeholder comments will be addressed, as well as national updates from AAAOM, and questions regarding the Affordable Care Act. Please accept our sincere appreciation for all of your efforts to promote the acupuncture and Oriental medicine profession in Virginia, and we look forward to your continued participation.

In gratitude for your service,

Janet L. Borges, MSTCM, Dipl.Ac. &C.H., L.Ac.  
Legislative Liaison, Acupuncture Society of Virginia