



Public Protection Through Quality Credentials

November 10, 2017

People's Organization of Community Acupuncture (POCA)
3526 NE 57th Avenue
Portland, OR 97213

Dear POCA Tech Board:

Thank you for your proposal sent to us via Sarah Evans, faculty member at POCA Tech, via email on October 28, 2017. We acknowledge the effort that went into developing this proposal. We also recognize and appreciate the energy and effort POCA and its members have made in supporting community acupuncture models to systematically offer accessible, lower cost acupuncture in many communities.

That said, we do have a number of concerns regarding the proposal that informs our decision regarding your request. We address them here:

In the proposal, you incompletely state our mission – that the NCCAOM is “only supposed to be concerned with safety”. Our mission is: *“To assure the safety and well-being of the public and to advance the professional practice of acupuncture and Oriental medicine by establishing and promoting national evidence-based standards of competence and credentialing”*. Please note that the mission must be viewed in its entirety. We are absolutely dedicated to consumer and public safety, as well as advancing the profession – by promoting high standards of competence and credentialing.

The assumption that we arbitrarily choose which topics are covered in our certification exams is incorrect. We recognize that TCM is only one paradigm within the wide scope of Acupuncture and East Asian medicine. It is, however, the most widely practiced form of East Asian medicine both in the United States and abroad. The content of our certification exams is created based on our Job Analysis (JA), which tracks what tasks real practitioners use in their practice setting—*clinic* – not necessarily what they are taught in school. From that information, we are able to create examination exam content that is directly linked the JA study that accurately ~~assess~~ documents the knowledge, skills and abilities required of an entry-level practitioner. The investment in creating a set of nationally accredited certification programs and demonstrably valid and reliable examinations is immense, involving thousands of hours of staff and volunteer

time. We strive for excellence because it is in the best interest of both the public and the profession.

The NCCAOM is certified by the National Commission for Certifying Agencies (NCCA) of the Institute for Credentialing Excellence. The NCCA's standards are rigorous and have become increasingly so over time. We cannot reduce our certification requirements without the risk of losing our accreditation.

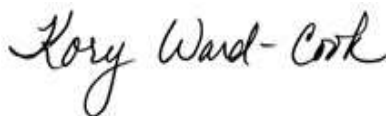
The length of the Master of Acupuncture and Master of Oriental Medicine Programs is an issue with ACAOM and with the Department of Education, which gives ACAOM the authority to accredit Master degree programs. (One of the factors contributing to the longer educational program with the Master's level is that only 60 hours of college credits are required for entrance into most acupuncture schools, whereas other Master's degree programs generally require a Bachelor's degree as a pre-requisite, in addition to specific coursework needed for the program).

Neither the NCCAOM nor ACAOM sets tuition for schools. Schools set their own tuition costs. The NCCAOM does not profit directly or indirectly from the cost of any school. Also, please note that the NCCAOM has multiple eligibility routes to sit for our certification exams. Our certifying body requires that all routes be substantially equivalent. We strive to create as much of a level playing field as possible.

Because of the factors noted above, it is the decision of the NCCAOM Board of Commissioners to not adopt the section of the proposal on behalf of the POCA Tech Board. As stated in our opening, we do appreciate your earnest efforts address some of the challenges of our profession.

Please feel free to contact me by phone (904-674-2501) or by email (kwardcook@thenccaom.org) if I can offer further information on this topic.

Sincerely,



Kory Ward-Cook, Ph.D., CAE
NCCAOM Chief Executive Officer



F. Afua Bromley, Dipl. Ac. (NCCAOM)[®], L.Ac.
NCCAOM Board Chair

cc: NCCAOM Board of Commissioners