

Statements of Support

The New York State Acupuncture Coalition, Inc. is a group consisting of the acupuncture and Oriental medicine (AOM) professional community – practitioners, educational institutions, professional organizations, and students – along with patients and supporters of the profession.

1. Association of Chinese Herbalist of New York (ACHNY)
2. American Traditional Chinese Medicine Society (ATCMS)
3. Acupuncture Society of New York (ASNY)
4. American Association of Acupuncture & Oriental Medicine (AAAOM)
5. Accreditation Commission For Acupuncture And Oriental Medicine (ACAOM)
6. American Acupuncture Council (AAC)
7. Council of Colleges of Acupuncture and Oriental Medicine (CCAOM)
8. The Federation of Acupuncture and Oriental Medicine Regulatory Agencies (FAOMRA)
9. High Falls Gardens
10. Kamwo Herbal Pharmacy
11. National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)
12. New Jersey Acupuncture Board
13. New York Chiropractic College Program in Acupuncture & Oriental Medicine (NYCC)
14. New York College of Traditional Chinese Medicine (NYCTCM)
15. Pacific College of Oriental Medicine (PCOM)
16. Pacific Alumni Association & Student Association
17. Touro College (President)
18. Touro College (Dean of Health Science)
19. Touro GPOM Alumni Association (Acufellows) & Student Council
20. Touro GPOM Student Association
21. Traditional Chinese Medicine World Foundation (TCM World Foundation)

纽约中医药联合总会

ASSOCIATION OF CHINESE HERBALIST OF NEW YORK

13-17 Elizabeth Street, Rm. 606

New York, NY 10013

Tel. 212-965-1503 Fax. 212-226-4717

October 12th, 2007

To Whom It May Concern:

This letter serves to clarify that the Board of Directors and by extension the membership of the Association of Chinese Herbalists is in support of NYS Acupuncture Coalition legislative initiative to include TCM Herbology into their scope of practice.

We also support the Coalition's claims that the bill being proposed neither mentions nor attempts to confine or to preclude the right of practicing Chinese Herbology by TCM practitioners who do not have Acupuncture licenses.

However, The Association of Chinese Herbalists also reserves the right to object and oppose if the NYS Acupuncture Coalition does not live up to the aforesaid conditions.

Sincerely,



Carl Shan Leung, President: Association of Chinese Herbalists

American TCM Society (ATCMS)

14 East 34th Street, 5th Floor

New York, NY 10016

Tel. (212) 689-1773

Fax. (212) 689-1898

www.atcms.org

May 21, 2007

RE: AOM TOWN HALL MEETING ON MAY 20, 2007

Dear Kathleen,

I am sorry to fail to attend the AOM town hall meeting at Touro College on May 20, 2007, because of ATCMS's initial academic activity on the same day.

We, most of former TCMAA leaders, have left TCMAA and re-organized a new organization – American TCM Society recently, due to the internal problems of TCMAA. More than 90 percent of former TCMAA members have joined our new organization, and more professional colleagues are going to do so.

ATCMS Acting Board has decided to support your legislative action and pointed Dr. Dazhi Chen, the member of ATCMS Acting Board, to join the New York Acupuncture/Oriental Medicine Community and the Coalition Steering Committee. On the behalf of our American TCM Society, Dr. Chen will work with your team for the legislative issue in future. You may contact with him at e-mail: dazchen@yahoo.com, or Tel. ((646) 262-7895, regarding this matter.

ATCMS will urge our members and other Chinese TCM and acupuncture organizations to participate the legislative action. We plan to promote the legislative proposal in Chinese professional community and require our colleagues to make a financial contribution. We do need the detailed information including: (1) Bill Text; (2) The title and mailing address which donation check should be made to and mailed to; (3) Other related information regarding the legislative proposal. We shall make a promoting reading material in Chinese, and mail it to our Chinese TCM and acupuncture colleagues.

If you have any questions regarding this letter, please feel free to contact with me at phone#: (212) 689-1773.

Thanks for your efforts!

Ling Zheng, L.Ac.
Secretary General
Acting Board of American TCM Society



Promoting the growth and preserving the integrity of the Acupuncture profession in New York since 1990
P.O. Box 1070 New Paltz, NY 12561 Phone: 914.923.0632 Fax: 845.255.9192 www.asny.org E-Mail: office@ASNY.org

May 26, 2007

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Eric Adler, L.Ac., L.M.T.

Dear Sir or Madam:

We, the Board of Directors of the Acupuncture Society of New York (ASNY), are writing to express our unanimous and unequivocal support for the efforts of the New York State Coalition to include herbs in our scope of practice.

Herbs and herbal diagnosis are already included in our training and reflected in our professional degree. We are requesting a change in our scope of practice to correct this omission. This correction to the existing statute would bring our license in line with our education.

Many thanks for your time and attention in this matter.

Sincerely,

The Board of Directors of the Acupuncture Society of New York



AMERICAN ASSOCIATION of
ACUPUNCTURE and ORIENTAL MEDICINE

PO Box 162840
Sacramento, CA 95816
866-455-7999
916-448-4766 Fax
www.aaaomonline.org
info@aaaomonline.org

May 31, 2007

Larry DeMers
Executive Secretary
State Board for Acupuncture
NYS Education Department
Office of the Professions
State Board for Acupuncture
89 Washington Avenue
Albany, NY 12234-1000

Dear Secretary DeMers,

We represent the American Association of Acupuncture and Oriental Medicine (AAAOM), the organization representing professional providers of acupuncture and Oriental medicine since 1983. Our membership base includes the state associations which are also active institutional members of the AAAOM. Both the individual and state association members actively participate in the election of officers and provide continuous input into the strategies and activities of the AAAOM.

We are writing to express our support for the work of the New York State Coalition for Acupuncture Legislation Initiative (the Coalition), and the legislation the Coalition proposes. We would like to convey to the New York State Acupuncture Board our concern in regard to the ongoing ability of New York State Licensed Acupuncturists to use herbs in their practices. We strongly support the Coalition's legislative initiative which is designed to place the use of herbs within the scope of NYS Licensed Acupuncturists.

If we may be of further assistance to your Board, please let us know.

Sincerely,

Leslie McGee R.N., L.Ac.
Dipl. AC/CH (NCCAOM)
President, American Association of Acupuncture and Oriental Medicine

Martin J. Herbkersman, MTOM, L.Ac., D.Ac.
Vice President, American Association of Acupuncture and Oriental Medicine

**ACCREDITATION COMMISSION
FOR ACUPUNCTURE AND ORIENTAL MEDICINE**

**Maryland Trade Center 3
7501 Greenway Center Drive, Suite 760
Greenbelt, MD 20770
301/313-0855
FAX: 301/313-0912
www.acaom.org**

May 31, 2007

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Lawrence P. De Mers
Executive Secretary
N.Y. State Board of Acupuncture
89 Washington Avenue
Albany, NY 12234-1000

Dear Secretary De Mers,

I am writing this letter on behalf of the Accreditation Commission for Acupuncture and Oriental Medicine ("ACAOM" or "Commission"). ACAOM is in full support of New York legislation that would specifically include the administration of herbs in an acupuncturist's scope of practice based on passage of the National Certification Commission for Acupuncture and Oriental Medicine's ("NCCAOM") herbal examination module.

Since ACAOM is the only accrediting agency in the United States that is recognized by the U.S. Department of Education as a reliable authority for quality education and training in the field of Acupuncture and Oriental Medicine, and since graduation from an ACAOM-accredited or candidate program is required for NCCAOM certification and for licensure in many states, we believe that we have unique expertise to address this particular issue.

ACAOM's accreditation standards, which were developed for the Oriental medicine profession, are utilized by most licensing boards in considering eligibility for practice as an Oriental medicine practitioner. These standards require four academic years training including, but not limited to, 705 hours of Oriental medicine theory, diagnosis and treatment techniques, in addition to over 870 hours in integrated acupuncture and herbal clinical training under the supervision of qualified clinical supervisors. There is also a significant Western biomedicine training requirement. ACAOM's core curriculum and competency requirements, which are recognized in most states where acupuncture licensure exists, and which are deemed necessary for the safe and effective practice of Oriental medicine, require extensive didactic course work and clinical training in Oriental herbal studies, including in the following areas: herbal medicine theory; Oriental diagnostic and treatment paradigms as they pertain to herbal medicine; herbal treatment strategies; Materia Medica; herbal formulas; food therapy/nutrition; and herbal clinical training. The herbal training requirements for accreditation specifically address herbal safety issues, including: contraindications of herbs and herbal formulas; drug-herb interactions; educating patients regarding

administration, potential side effects, and preparation; medical signs and symptoms that warrant referral to another health care professional, among many others. ACAOM accreditation standards for herbal medicine training can be fully accessed through the Commission's web site at www.acaom.org under the Handbook link, Part 1 sublink under Essential Requirement 8, pp. 21-35.

Since NCCAOM requires graduation from an ACAOM-accredited or candidate program for candidates to be eligible for NCCAOM herbal certification, legislation that requires NCCAOM certification would effectively ensure that New York acupuncturists have both received adequate training and demonstrated the professional competencies for the safe and effective practice of herbal medicine.

I hope that this information proves useful as the Acupuncture Board considers this issue. Please do not hesitate to contact me should you require additional information.

Sincerely,



Dort S. Bigg, JD
Executive Director

May 31, 2007

Mr. Larry DeMers
Executive Secretary
NYS Education Department
Office of the Professions
State Board for Acupuncture
89 Washington Avenue
Albany, NY 12234-1000

VIA TELECOPIER & REGULAR MAIL
315/533-4484

Dear Secretary DeMers:

The American Acupuncture Council ("AAC") wishes to go on record with its support of the New York State Coalition for Acupuncture Legislation Initiative ("The Initiative"). The AAC has over 11,000 licensed acupuncturists as members and has been keeping statistics on malpractice claims against acupuncturists for the last 21 years. In this context, we have found that herbs are probably the safest modality employed by acupuncturists. There have been only two small claims in 21 years, both of which were minor in nature. The AAC stands ready to provide coverage for herbs in New York at no additional charge.

I appreciate your consideration of this information.

Sincerely yours,



Michael J. Schroeder
Vice-President and General Counsel

MJS/djc.1673

c: Kevin V. Ergil, L. Ac. (via regular mail)



Council of Colleges of
Acupuncture and Oriental Medicine

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May 29, 2007

Lawrence P. De Mers
Executive Secretary
N.Y. State Board of Acupuncture

By Facsimile: 518-486-4846

Dear Mr. De Mers:

This letter is on behalf of the Council of Colleges of Acupuncture and Oriental Medicine (Council), the 501(c)(6) nonprofit membership association for acupuncture and Oriental medicine (AOM) colleges in the U.S. since 1982, and in response to what appears to be a recent issue concerning the legal right of licensed acupuncturists in New York to practice Chinese herbology. Whatever the specific contours of this issue may be by reference to applicable state law and regulations in New York, the Council would urge that any necessary clarification by state authorities recognize that licensees who have been trained and/or certified in Chinese herbology by reference to national standards of training and certification, as administered respectively by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM) and the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM), are well qualified to practice Chinese herbology and should be so recognized under the laws of New York.

At least 21 states explicitly authorize the use of Chinese herbs as part of the scope of practice for the acupuncture profession.¹ Moreover, of the 53 colleges that comprise the membership of the Council, seven of which are located in New York, most offer training in Chinese herbology as part of a professional Master's degree in Oriental medicine. All of the Council's member colleges have obtained either accreditation candidacy or full accreditation status with ACAOM, which is the

¹ See National Acupuncture Foundation, *Acupuncture and Oriental Medicine State Laws and Regulations* 119 (2005 ed.) [Table 3].

national organization recognized by the U.S. Department of Education for the accreditation of AOM programs in the U.S.

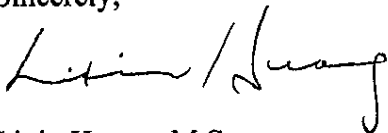
Under ACAOM's accreditation standards, AOM colleges that offer Chinese herbology as part of an Oriental medicine curriculum, in addition to requiring at least 705 hours in Oriental medical theory, diagnosis, and treatment techniques in acupuncture, must require 450 hours in didactic Oriental herbal studies, 870 hours in integrated acupuncture and herbal clinical training, and 510 hours in biomedical clinical science.² Institutions that offer a separate herb certificate training program for Master of Acupuncture students and practitioners must require a minimum of 450 hours of didactic instruction in herbs and 210 hours of herbal clinical training.³

A substantial number of graduates of ACAOM approved institutions take a national certification exam specifically in Chinese herbology. The National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM), which is recognized by the National Commission for Certifying Agencies as the national testing organization for the AOM field, administers this examination.⁴ In 2005-2006, over 2000 AOM graduates took NCCAOM's national certification exam in Chinese herbology.

Acupuncturists in New York and in other states that have met the foregoing national standards of training and/or certification in Chinese herbology have satisfied the highest standards of training and certification available in the U.S. for this field. It is most appropriate, therefore, that New York take whatever legislative or administration action necessary to confirm the legal right of acupuncture licensees in the state to utilize Chinese herbs as part of their professional practice. Alternatively, the state should refrain from taking action that would unduly restrict this right and possibly increase the burden and cost of professional practice to acupuncture practitioners and their patients.

Please feel free to use this letter in appropriate forums within the state to ensure that licensed acupuncturists in New York, who have met national standards of training and certification in Chinese herbology, may lawfully practice what they are so well qualified to do.

Sincerely,



Lixin Huang, M.S.
President

² See www.acaom.org (Accreditation Handbook, Part I, Essential Requirement 8.1).

³ *Id.*

⁴ See www.nccaom.org.

The Federation

of Acupuncture and Oriental Medicine Regulatory Agencies
4201 Patterson Avenue, Baltimore MD 21215 • www.FAOMRA.com

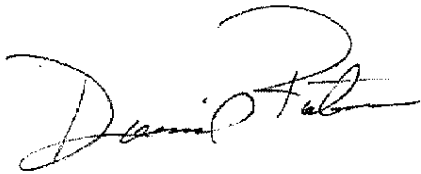
Office of the Professions
State Education Building - 2nd floor
Albany, NY 12234

May 30, 2007

To the members of the New York State Board for Acupuncture,

As President of the Federation of Acupuncture and Oriental Medical Regulatory Agencies (FAOMRA) I am writing to express FAOMRA's support of the legislative initiative currently being proposed by New York State Coalition for Acupuncture Legislation Initiative (the Coalition). While we do not advocate for specific legislative direction or language, the Federation does support legislation which enhances our legislative and regulatory ability to protect the public by ensuring educational standards and national certification. This legislation proposed by the Coalition does so by adopting current, nationally recognized, industry standards for herbal and oriental medicine education and certification. The Federation hopes that the Board will endorse legislation which will help ensure the safety of the public and recognize national standards for the practice of herbal medicine.

Thank you for your time and consideration



David C. Paton, M.Ac., L.Ac.
President of FAMORA
Chair of the Maryland Acupuncture Board

2006-2007 The Federation Board of Directors
President David Paton, Maryland • Vice President Pete Gonzalez, Arizona • Treasurer Penny Heisler,
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25 May 2007

Lawrence P. DeMers
State Board for Acupuncture
Office of the Professions
New York State Education Department
State Education Building, 2nd Floor
Albany, NY 12234

Re: Scope of Practice for Acupuncture and Oriental Medicine

Mr. DeMers:

I wish to strongly endorse the request of the Acupuncture and Oriental Medicine (AOM) practitioners licensed in New York for a modification of their scope of practice statement so as to more fully and accurately describe the benefits they currently provide to their patients.

High Falls Gardens is a farm-based nonprofit organization located in Columbia County, which leads a statewide and a national group of farmers who are developing domestic production of Asian and other medicinal herbs. We regard the profession of AOM as the best organized group of licensed practitioners who can utilize and add value to medicinal herbs, thereby providing safe and effective dietary supplementation to the general public.

The AOM theoretical model of herbalism relies on empirically tested combinations of herbal ingredients that are balanced and have been proven safe over millennia of use. These ingredients are whole plant parts that can be grown, harvested, cut and dried on the farm. The AOM modality is of great importance for local agriculture because direct sales are possible and profits can accrue to the farmers rather than to a manufacturer who buys low-cost raw materials.

Our New York AOM practitioners are especially cognizant of the additional health and economic benefits to be gained from local production of herbs, and are eager to play a leading role in the development of such a resource. Everyone stands to gain when our state's AOM practitioners, by virtue of their substantial training, certification and experience in herbal practice, achieve full recognition in licensure. Such improvements in the law will protect our citizens and inform their choices.

Please give their request your prompt and favorable consideration. You may contact me at 518-672-7365 or hfg@capital.net for clarification or additional information.

Sincerely,

Jean Giblette, Director



211 Grand Street
New York, NY 10013
Tel. 212-966-6370 Fax 212-226-4717
www.kamwo.com
Email: customerservice@kamwo.com

May 31, 2007

Larry DeMers, Executive Secretary
State Board of Acupuncture
NYS Education Department
Office of the Professions
State Board of Acupuncture
89 Washington Avenue
Albany, NY 12234-1000

Dear Secretary DeMers:

As CEO of Kamwo Herbs, I am writing to support the New York State Coalition for Acupuncture Legislation Initiative in its legislative effort to include Chinese Herbs within the scope of practice of New York licensed acupuncturist.

Kamwo Herbs have been serving the TCM community since 1973, we are currently the oldest and largest provider of TCM pharmacy services in New York. We are currently serving the herbal needs to many NYS licensed acupuncturist. We are in support because we believe that Chinese herbs are a significant and integral part of the practice of TCM. It is important to recognize individuals who have been trained to be licensed as acupuncturists who also are trained in herbal medicine. This allows the establishment and recognition of a minimal standard that our profession sorely needs. This will serve to the best interest of TCM practitioners and more importantly citizens.

It is our hope that your consideration of these issues to be favorable.

Sincerely,

Thomas N. Leung
CEO



May 29, 2007

State Board of New York

To Whom It May Concern:

I am submitting this letter on behalf of the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM). NCCAOM wishes to offer its full support for the legislative changes proposed by the New York State Coalition for Acupuncture. The recommendations, including the requirement that applicants who plan to include herbology must successfully complete the NCCAOM herbal examination module, represent a continuation of the high standards already established by New York State. Applicants who seek to practice acupuncture have been required to pass the NCCAOM acupuncture modules for many years. This new examination requirement will ensure that applicants meet nationally recognized standards of competence and safety in the practice of herbology.

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. As a part of meeting this mission, NCCAOM has developed a unified set of nationally verified, entry-level standards for safe and competent practice of acupuncture and herbology.

NCCAOM certification and examination programs are accredited by the National Commission for Certifying Agencies (NCCA) of the National Organization for Competency Assurance (NOCA). In addition, NCCAOM has recently applied for accreditation under the American National Standards Institute (ANSI). ANSI offers national and international accreditation for standards developing organizations.

The value of NCCAOM's national examinations is demonstrated by its acceptance in 40 of the 41 states that have laws for licensing acupuncturists. This means that 97% percent of states that regulate acupuncture require NCCAOM examinations for licensure. I have included a map which illustrates the states that require NCCAOM examinations. All of these states recognize the psychometrically sound system of examinations that NCCAOM has developed. These states have elected to use NCCAOM's testing instrument while continuing to regulate and license practitioners in their state according to their own eligibility requirements and procedures.

It is a considerable professional achievement to earn the designation *Diplomate (NCCAOM)*. NCCAOM Certification indicates to employers, patients, and peers that one has met the national standard for the safe and competent practice of acupuncture as defined by the profession. NCCAOM has issued over 20,000 certificates in Acupuncture, Oriental Medicine, Chinese Herbology and Asian Bodywork Therapy. By adopting recognized national standards, regulators are assured that first-time licensees have met the standard for education and examination.



The trend in health care throughout the nation is not only to license acupuncturists but to raise standards for licensure. For instance, in Arkansas, New Mexico, Nevada and Texas, an individual must not only pass the NCCAOM examinations in acupuncture, but must also pass the NCCAOM exam in Chinese herbology. States are also increasing their requirements for formal education. These changes are based on the premise of maintaining and improving the quality of healthcare for the citizens of these states.

To qualify for NCCAOM certification in Chinese herbology or Oriental medicine, an applicant applying through the route of formal education must meet the following standards. The applicant must graduate from a formal, full-time school or college of Oriental medicine program that has been accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM) or an equivalent educational body that documents at least 2,625 hours of entry-level education. We consider this standard of eligibility, along with the successful performance on the examination, *to be the minimum requirements* for the safe practice of herbology.

I hope you will find this information valuable. Please consider the NCCAOM as a resource for current information about the standards of competence and practice within the field of acupuncture and Oriental medicine. If I can offer further information on this topic, please contact me by phone at (904) 674-2501 or by email, kwardcook@nccaom.org.

Sincerely,

A handwritten signature in black ink that reads 'Kory Ward-Cook'. The signature is written in a cursive, flowing style.

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

February 7, 2007

NJAAOM

**NEW JERSEY
ASSOCIATION OF
ACUPUNCTURE AND
ORIENTAL
MEDICINE**

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Robert Lenahan, C.A.

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37 Kings Road
Suite 205
Madison, NJ 07940

NY State Coalition for Acupuncture Legislative Initiative
Town Hall Meeting
Touro College, School of Health Sciences
27 West 23rd Street, 6th Floor
New York, NY 10010

To Whom It May Concern:

On behalf of the New Jersey Association of Acupuncture and Oriental Medicine (NJAAOM), I would like to present our opinions on the legislative issues at hand. Unfortunately, I, nor anyone from NJAAOM, are available to participate in this meeting, however, we are interested in pursuing future meetings to discuss ongoing issues and legislation, for instance the continued efforts of plenary licensed physicians and chiropractors who want to practice acupuncture with an abbreviated route of entry.

We are in wholehearted agreement that the standards of acupuncture and Chinese herbal medicine be upheld and improved regularly as the healthcare environment changes. Those of us who have studied Chinese herbal medicine are well aware of how important it is to the practice of Oriental medicine as well as the importance of being properly trained to practice it safely. It is time to incorporate Chinese herbal medicine into our scope of practice, and into state statutes. In this way, we can better assure public safety, educational standards and define, more completely, our scope of practice.

Continuing Education requirements are essential to our profession. We have a basic education in Oriental Medicine when we graduate and there is a plethora of information available about it. It makes sense to encourage practitioners of acupuncture and Oriental medicine to broaden and expand their knowledge of the subject, beyond what is taught in school.

All of these issues are critical to maintaining high practice standards and will aid us in our future dealings with physicians, chiropractors and legislators. You have our support in all of your legislative endeavors.

Sincerely,



Candace Sarges, M.Ac., C.A., Dipl. O.M., President



NEW YORK
CHIROPRACTIC
COLLEGE
OFFICE OF THE PRESIDENT

May 31, 2007

Larry DeMers, Executive Secretary
State Board for Acupuncture
NYS Education Department
Office of the Professions
State Board for Acupuncture
89 Washington Avenue
Albany, NY 12234-1000

Dear Secretary DeMers,

As President of New York Chiropractic College, I would like to express my strong support for the legislative changes proposed by the New York State Coalition for Acupuncture Legislation Initiative. Our Master of Science programs in Acupuncture and Oriental Medicine (Upstate New York's first) arose through an amendment of the College's charter in December, 2002, allowing the College to offer new degrees, and 2003 approval from New York State's Board of Regents and its State Education Department to establish two new Master's degree programs – Acupuncture (MSA) and Acupuncture and Oriental Medicine (MSAOM). I am pleased to see that the legislation represents an important step toward responsible regulation of Chinese herbs that are recommended or prepared by New York's licensed acupuncturists.

The bill endorsed by the Coalition requires acupuncturists to learn how to identify and report instances of child abuse and maltreatment. Our acupuncture students currently receive course instruction on this topic, and it is reasonable that acupuncturists would join New York's other healthcare professionals in recognizing those in need of protection.

The bill includes provisions for continuing professional education. New York Chiropractic College offers continuing education for both chiropractors and acupuncturists. We have long recognized that lifelong learning enables healthcare professionals to stay abreast of their disciplines' diverse and constantly evolving practice methods.

Finally, the bill before you would enable acupuncturists licensed in other states and countries to conduct limited clinical demonstrations in New York. The legislation requires a clear association with educational instruction and outlines a process that promotes safety. Consequently, I support the Coalition's efforts to foster these open exchanges relating to courses of therapy.

Thank you for your consideration in these matters and please contact me if I may be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank J. Nicchi".

Frank J. Nicchi, DC, MS
President



NEW YORK COLLEGE OF TRADITIONAL CHINESE MEDICINE

155 First Street
Mineola, NY 11501
Phone (516) 739 1545
Fax (516) 873 9622

May 25, 2007

Ms. Kathleen Golden
New York State Coalition For
Acupuncture Legislative Initiative

Dear Kathleen:

Please accept this letter from the New York College of Traditional Chinese Medicine in support of the Coalition's proposed legislative goals. Our college has been offering programs in Chinese Herbology since its inception, and currently a large proportion of our students are working towards their BPS/MS in Health Sciences/Oriental Medicine. Lately more and more of our students have expressed concern that New York State will not protect the practice of herbs by licensed acupuncturists, and it has come to the point where this issue is seriously threatening our enrollments. It is difficult to explain to students why New York State would approve our program in Oriental Medicine and authorize our college to grant degrees in this field without also providing scope for the practice of herbs within the acupuncture profession.

We find that the Coalition's legislative goals are eminently reasonable. Similar legislation has been recently passed in Massachusetts and New Jersey, and many other states already provide for herbal treatment under the scope of acupuncture practice. Other proposed legislative goals would bring acupuncture regulation and scope in line with other NYS-regulated health professions.

We hope that the Coalition will find success in its initiative and are willing to do whatever is necessary to help the Coalition achieve its goals.

Sincerely yours,

Yemeng Chen
President



Pacific College of Oriental Medicine

May 30, 2007

Larry DeMers, Executive Secretary
State Board for Acupuncture
NYS Education Department
Office of the Professions
State Board for Acupuncture
89 Washington Avenue
Albany, NY 12234-1000

Dear Secretary DeMers:

As President of Pacific College of Oriental Medicine, I am writing to support the New York State Coalition for Acupuncture Legislation Initiative in its legislative effort to include Chinese herbs within the scope of practice of New York licensed acupuncturists.

Chinese herbs are a significant part of the academic and clinical training of Pacific College's Master of Science degree in Traditional Oriental Medicine, which leads to eligibility for licensure as an acupuncturist in New York. This curriculum was recognized by the New York State Education Department in its original form as a diploma program in 1993 and as a Master's degree in 1998.

Thus, for almost 15 years the Office of the Professions and the New York State Department of Education have recognized that individuals who have been trained to be licensed as acupuncturists are also being trained to use Chinese herbs concurrently, and are being awarded a degree that evidences their competency to do so.

We welcome your consideration of these issues. If you have any questions, please do not hesitate to contact me.

Sincerely,

Jack Miller, L.Ac., M.A.
President

Mr. Larry DeMers
NYS Education Department
Office of the Professions
State Board of Acupuncture
89 Washington Avenue
Albany, NY 12242-1000

May 31, 2007

Dear Secretary DeMers,

We represent the student assembly and alumni network of Pacific College of Oriental Medicine in New York City, a population of over 400 current students and more than 1,700 alumni in the Northeast and around the United States. We are mobilizing to become a united front in support of the Legislative Initiative currently being presented by the New York State Coalition. We uphold and support their beliefs that the scope of practice in New York State must include the practice of Chinese Herbal Medicine for those of us who are licensed acupuncturists, and who have met the required didactic and clinical hours to train in Herbology. We are trained extensively in this highly efficacious and safe Traditional Herbal Medicine, and have logged the classroom hours and clinical experience that warrant the effective recommendation of herbal formulae.

Our gravest concern is the fact the the New York State Department of Education has permitted the awarding of a degree that seems to be at odds with the NYS Acupuncture license: the MSTOM degree. Why is it that one may attain a Masters of Science in Traditional Oriental Medicine (according to the strict guidelines set by ACAOM), and yet herbal practice is not fully legitimized? This disparity must be rectified, for it evokes a contrary message from the very Office of Professions that oversees licensure.

We are confident that once you view this matter from the aforementioned perspective, you will join us in supporting a legislative agenda that writes the practice of Herbal Medicine as part of the statute and law that governs Acupuncture and Oriental Medicine in New York State.

New York State is at the forefront of education in the United States; ranking with California and Minnesota in academic excellence at the Secondary School Level. Shouldn't our licensed professions meet the same level of standards and be on the cutting edge? Our Master's program in Oriental Medicine, as overseen by the NCCAOM (The National standard for almost all states that license Acupuncture and Oriental Medicine) is THREE AND 2/3 YEARS in its length at many institutions.....is this not exhaustive enough to justify superlative training in our studies?

Thank you for hearing our concerns. We look forward to working with you and the entire Coalition in achieving a mutually satisfying situation; and most importantly-- one that serves the rapidly growing population of patients in New York State who have found Acupuncture and Herbal Medicine to be a highly therapeutic and rewarding healing system.

With Gratitude,

Jeremy V. Pulsifer, L.Ac.
Alumni Association President, PCOM New York City

Dina Liebowitz
Student Council Secretary, PCOM New York City

**Touro College Graduate Program of Oriental Medicine Alumni Association
and
Touro College Graduate Program of Oriental Medicine Student Association**

May 30, 2007

Dear Sir or Madam:

We, the members of Acufellows, the Touro College Graduate Program of Oriental Medicine Alumni Association and the Touro College Graduate Program of Oriental Medicine Student Association are writing to express our unanimous and unequivocal support for the efforts of the New York State Coalition to include herbs in our scope of practice.

Chinese herbs, herbal diagnosis, and herbal safety are already included in our training and reflected in our professional degree, a Master's of Science in Acupuncture and Oriental Medicine. We are requesting a change in our scope of practice to correct this omission. This correction to the existing statute would bring our license in line with our education.

Many thanks for your time and attention in this matter.

Sincerely,

The Acufellows Council Members

Jessica Yunker, MS, L.Ac
Joseph Alban, MS, L.Ac
Johanna Herget, MS, L.Ac
Debra Valentin, MS, L.Ac
Elizabeth Shiah, MS, L.Ac

GPOM Student Association Council Members

Michelle Helfner
Michael Jabbour
Alexa Kate Myer



Traditional Chinese Medicine
WORLD FOUNDATION

May 25, 2007

To: New York State Acupuncture Board

On behalf of the Traditional Chinese Medicine World Foundation, I would like to offer the Foundations full support of the New York State Coalition for Acupuncture Legislative Initiative.

TCM World Foundation believes that the public must be served by the highest standards of acupuncture and herbal practice. Accordingly, we are in full support of the provisional bill language proposed by the New York State Coalition.

TCM World Foundation disseminates information about the deep philosophical basis and healing wisdom of TCM and makes the active connection between low-cost health-care options, behavioral and social change and integrative and collaborative medicine. Through our numerous educational programs, we reach thousands of individuals each year who are seeking to incorporate Eastern methods of wellness.

Sincerely,

Elaine Katen



Touro College

School of Health Sciences

1700 Union Boulevard • Bay Shore, New York, 11706 • 631-665-1600 x 257 • email: josephw@touro.edu www.touro.edu/shs

Office of the Dean

Larry DeMers, Executive Secretary
State Board for Acupuncture
NYS Education Department
Office of the Professions
State Board for Acupuncture
89 Washington Avenue
Albany, NY 12234-1000

May 30, 2007

Dear Secretary DeMers,

Touro College's School of Health Sciences offers, amongst its many programs, a Graduate Program in Oriental Medicine. As the Dean of the School I oversee that program and I am aware of its professional goals. Therefore, I fully support the activities of the New York State Coalition for Acupuncture Legislation. In particular I would like to convey to the NYS Acupuncture Board that it is time to incorporate the use of Chinese Medicinal into the practice act. The curriculum of our Oriental Medicine Program which is approved by NYS Education Department incorporates the training in the use of Chinese Medicinal agents and integrating it into the overall practice of Acupuncture, which is needed to justify such an inclusion into the practice act. To my knowledge, there are at least 6 NYS degree granting programs in Oriental Medicine (PCOM, Touro College GPOM, NYCC SAOM, NY College of Health Professions, Mercy College GPAOM, and NY College of Traditional Chinese Medicine). Therefore, I would like the NYS Acupuncture Board to support the legislation that is proposed by the coalition.

As Dean of the School of Health Sciences, I am concerned about the problem which currently confronts the acupuncture profession and I strongly support the NYS Coalition for Acupuncture's proposed Legislation.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Weisberg".

Joseph Weisberg, P.T., P.h.D
Dean
School of Health Sciences