Background:

There is longstanding confusion by the general public, patients, and other healthcare and insurance providers about the various levels of acupuncture and Oriental medicine (AOM) training, related degree titles, and associated terminology. The Accreditation Commission for Acupuncture and Oriental Medicine (‘ACAOM’ or ‘Commission’) believes that well-understood and consistently applied degree titles will help eliminate this confusion and ultimately contribute to growth and recognition of the AOM profession. To help achieve these goals ACAOM implemented a program naming policy at its February 2020 Commission meeting requiring all ACAOM-accredited institutions and programs to use only authorized names for all ACAOM accredited/pre-accredited programs by 1 January 2022.

Key Steps in Making the Decision:

1. In 2014, ACAOM began efforts to address confusion within the degree structure and title designations of ACAOM-accreditable programs.

2. From November 2015 to January 2017, ACAOM led a formal, multi-phased research process, using an independent and qualified principal investigator applying a modified Delphi research method and an advisory committee, to engage stakeholders and communities of interest concerning how best to name ACAOM-accreditable degree titles. Seven (7) different organizations representing English, Chinese, and Korean speaking clinicians, students, and educators were invited to participate in the modified Delphi study.

3. In February 2017, the Commission reviewed the results of the modified Delphi study and approval was granted to expand the study and conduct a national survey.
4. **In August 2017**, ACAOM conducted a *National Degree Title Survey*. This survey applied the results of the Delphi study and sought additional input from all relevant stakeholders and communities of interest on ACAOM’s then current degree titles used throughout the U.S. The survey was widely distributed and included questions available in English, Chinese and Korean to ensure full participation. Over 1,700 responses to the survey were received. ACAOM contracted with a market research and communications company specializing in audience and market research and public opinion to assess the responses. Survey results indicated consensus around two (2) degree titles: (1) an advanced practice doctorate (i.e., Doctor of Acupuncture and Oriental Medicine (DAOM), and (2) an entry-level degree in acupuncture (i.e., a Master and/or Doctor of Acupuncture). Survey results reported no consensus for entry-level degrees in Oriental medicine.

5. **In July 2018**, ACAOM conducted a *Degree Designation Project Closing Survey* to evaluate community support for the incorporation of “traditional medicine” within ACAOM-accreditable degree titles. Survey results reported no consensus for the use of “traditional medicine” and identified noteworthy concerns opposing the use of “traditional medicine.”

6. **In August 2018**, ACAOM reviewed the results of all survey reports and input it received to date about degree titles.

7. **In February 2019**, ACAOM published its *Degree Structure and Naming Convention Policy*. This policy provided that all ACAOM accredited/pre-accredited degree programs must convert to ACAOM’s published degree structure and naming convention no later than 31 December 2022.

8. **In October 2019**, the Commission found there was merit in providing stakeholders and communities of interest additional opportunities for thoughtful and data-supported public comment regarding ACAOM’s degree structure changes. To that end, the Commission suspended full implementation of its *Degree Structure and Naming Convention Policy* to permit an additional sixty (60) day public comment period.

9. **At its February 2020 meeting**, the Commission, informed by additional public comments, reassessed the degree structure and naming convention policy and implemented changes. The *Degree Structure and Naming Convention Policy* was formally retired and replaced with ACAOM’s *Program Naming Policy*. Because the program naming policy does not involve significant changes to degree structure as in the retired policy, the Commission changed the date for required compliance to **1 January 2022**.
Details of Evidence Considered:

1. Prior to 2019, ACAOM accreditation standards did not mandate degree titles for entry-level programs (i.e., master’s-level programs, certificates programs, and professional doctoral programs) and allowed institutions to name their degrees conferred subject to degree-granting approval from their state higher education authority. This practice resulted in a potpourri of degree titles causing confusion by the public, patients, other healthcare professions, insurers and regulators.

Solution. ACAOM’s naming policy standardizes all accredited/pre-accredited program titles, thereby strengthening recognition of the profession and its requisite training.¹

2. Results of ACAOM’s 2017 nationwide survey of the profession showed a consensus around two (2) degree titles: (1) advanced practice doctorate - Doctor of Acupuncture and Oriental Medicine (DAOM), and (2) entry level degree in acupuncture- Master/Doctor of Acupuncture.

Solution. ACAOM’s naming policy incorporates the degree titles determined by valid research to be generally agreed upon by members of the profession.

3. In healthcare professions (e.g. medicine, chiropractic, physical therapy, occupational therapy, pharmacy, naturopathy), professional degree titles typically align with licensure titles. In the case of acupuncture licensure titles, forty-one (41) states plus the District of Columbia have acupuncture-only practice acts and use “acupuncturist” as the licensure title, and four (4) of the six states that require herbal training for licensure use “acupuncturist” or “acupuncture physician” as the licensure title.

Solution. ACAOM’s naming policy aligns entry-level professional degree names with their licensure title in the majority of states licensing acupuncture professionals.


In addition, according to the newly published Department of Veteran’s Affairs (VA) Handbook, state licensed acupuncturists now have an established occupation qualification standard for employment positions within the VA Health Administration. This recent change establishes the “acupuncturist” occupation under VA’s Title 38 hybrid excepted service employment system in accordance with the authority established under the “Caregivers and Veterans Omnibus Health Services Act of 2010.”

Further, preliminary efforts are being made by the U.S. Department of Health and Human Services (HHS) and the Centers for Medicare and Medicaid Services (CMS) to permit those covered by Medicare access to acupuncture.

¹ Since ACAOM’s implementation of accreditation standards for the advanced practice doctoral program, the only title recognized by ACAOM for the advanced practice doctoral degree is Doctor of Acupuncture and Oriental Medicine (DAOM). The structure and naming of the advanced practice doctoral degree is unchanged by the convention.
Solution. ACAOM’s naming policy aligns the entry-level professional degree titles with the U.S. Bureau of Labor Statistics distinction, VA occupation qualification, and HHS/CMS recognition.

5. It is atypical for entry-level professional degrees to be distinguished by curricular concentration (i.e., master’s level degree in acupuncture versus master’s level degree in acupuncture that incorporates comprehensive training in herbal medicine).

Solution. ACAOM’s naming policy aligns the structure of entry-level acupuncture professional degrees with professional degree structure adopted by other healthcare professions.

6. ACAOM’s communities of interest, particularly the Council of Colleges of Acupuncture and Oriental Medicine (CCAOM), have historically expressed a strong desire to differentiate graduates who complete training in herbal medicine from those that completed acupuncture-only training.

Solution. ACAOM’s naming policy distinguishes and enhances recognizability of training in Chinese herbal medicine by providing a uniformly titled graduate specialization.

7. Public comments received from ACAOM’s communities of interest regarding the Degree Structure and Naming Convention were generally not supportive of the mandate to separate Oriental medicine programs into dual degree programs in acupuncture and Chinese herbal medicine. Concerns were expressed related to potential state regulatory challenges and compromising the educational integrity of a single program comprised of acupuncture and Chinese herbal medicine training.

Solution. ACAOM’s naming policy maintains the familiar program structure of ACAOM-accreditable programs.

8. ACAOM has historically provided opportunity for offering master’s-level training in Chinese herbal medicine apart from acupuncture training via a graduate certificate in Chinese herbal medicine. This certificate program always required applicants to be graduates of, or concurrently enrolled in, an accredited/pre-accreditation entry-level program leading to qualification for professional licensure and national certification in acupuncture.

Solution. ACAOM’s naming policy retains the option for training programs in Chinese herbal medicine for graduates, or current students of, a master’s-level program in acupuncture.

9. A profession is considered a body of persons engaged in a calling requiring specialized knowledge and intensive academic preparation. Considering that in the United States, the acupuncture profession continues to be a nascent profession, any segmentation or confusion within the profession’s identity frustrates professionalization and restricts its potential as a viable medical option.

Solution. ACAOM’s naming policy standardizes entry-level degrees that provide qualification for professional licensure and national certification in acupuncture thereby strengthening professionalization, while preserving a viable pathway for obtaining appropriate training in Chinese herbal medicine to address student interest and/or facilitate professional licensure and national certification requirements.
10. As evidenced by mounting trends in state legislation, public perception of “political correctness,” intense discussions within the CCAOM, and ACAOM’s public survey data there appears to be a desire inside and outside of the profession to move away from the use of the term “Oriental” to avoid its potential interpretation as derogatory.

Solution. ACAOM’s naming policy removes the use of the term “Oriental” from all entry-level degree titles.

11. Historically, the profession, CCAOM, and ACAOM have supported and fostered a diversity of educational approaches and curricular emphases within the field.

Solution. ACAOM’s naming policy promotes flexibility and diversity of educational approaches.

### Revision History

<table>
<thead>
<tr>
<th>Date Revised</th>
<th>Summary of Revisions</th>
<th>Approved By</th>
</tr>
</thead>
<tbody>
<tr>
<td>7 October 2020</td>
<td>“Key Steps in Making the Decision” 9. was corrected to reflect the change in compliance date from 31 December 2022 to 1 January 2022, as of 6 March 2020 and consistent with the Program Naming Policy; other references were corrected for consistency.</td>
<td>ACAOM Executive Director</td>
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<tr>
<td>6 March 2020</td>
<td>The Commission formally retired its former Degree Structure and Naming Convention Policy and replaced it with a new ACAOM Program Naming Policy. References herein to degree structure changes were removed and additional evidence #7 added.</td>
<td>ACAOM Commission</td>
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