



Advocacy Update

By Molly Giammarco, Senior Manager, Government Relations



The NCCAOM® Advocacy team consisting of Government Relations staff and volunteers continues to represent NCCAOM certification, Diplomates, and stakeholders by providing information to promote acupuncture services to state and federal policymakers to include the Department of Health and Human Services (HHS), the Centers for Medicare & Medicaid Services (CMS), as well as other stakeholder groups.

Regulatory Comments

NIH Request for Information (RFI): Important Considerations for Potential Creation of an Open-Access Repository or Database for Physiological and Anatomical Ontology of Acupoints

The NCCAOM Advocacy team along with American Society of Acupuncturists (ASA) and Society for Acupuncture Research (SAR) [responded](#) to the NIH's National Center for Complementary and Integrative Health's (NCCIH) request for information on creating an acupoints database in September 2019. The comments provided feedback on the impact of such a database on acupuncture and acupuncture research, appropriate metrics for acupoint stimulants, anatomical references and regions for acupoints, acupoint nomenclature, acupoints for treating complex diseases, outcome measures, transcutaneous peripheral stimulation paradigms, and evaluation tools.



The NCCAOM response cited research for each of these topics and recommended that NCCIH further consider the ASA's and the SAR's recommendations for acupuncture research.

HHS RFI for the Development of a CMS Action Plan to Prevent Opioid Addiction and Enhance Access to Medication-Assisted Treatment

In October 2019, the NCCAOM Advocacy team [responded](#) to CMS' request for information to develop an action plan for combatting opioid abuse and addiction. The NCCAOM's comments advocated for increased access to acupuncture, reimbursement for acupuncture, and coverage for acupuncture services.

The comments also identified research gaps and opportunities to build the evidence base for acupuncture as a viable nonpharmacological treatment option for chronic pain, as well as for behavioral health. The NCCAOM comments specifically recommended that state Medicaid plans make acupuncture services available to beneficiaries, especially those with substance abuse challenges, citing several successful state programs that currently exist.

Agency for Healthcare Research and Quality (AHRQ): Noninvasive Nonpharmacological Treatments for Chronic Pain: A Systematic Review Update

The NCCAOM advocacy team collaborated with ASA leadership to respond to AHRQ's Noninvasive Nonpharmacological Treatments for Chronic Pain updated draft in early November 2019. The [comments](#) identified current research gaps around acupuncture efficacy and viability, especially as a tool for reducing chronic pain and opioid overuse. The comments also strongly encourage AHRQ to commission acupuncture research to discover a stronger evidence base for acupuncture's effects on chronic pain by initiating more specific and thorough acupuncture studies that include—and are led by—nationally certified and licensed acupuncturists. Both groups also recommend that AHRQ and its associated research bodies further explore the dangers and costs of opioids compared to acupuncture treatments, as well as comparative effectiveness research, and other trending research nuances.



Federal and State Initiatives and Partnerships



Molly Giammarco (left) at the Coalition Hill Day with Ohio Congressman Brad Wenstrup (lower right)

Voices for Non-Opioid Choices

The NCCAOM advocacy staff continue to participate and contribute to the Voices for Non-Opioid Choices Coalition initiatives to increase access to non-opioid therapies and approaches to managing acute pain. NCCAOM participated in the Coalition launch. Advocacy staff provided feedback to draft legislation that would increase access to non-opioid pain treatments. The NCCAOM staff advocated for additional language specifically promoting nonpharmacological treatment options that the draft currently includes. The Coalition expects to introduce this bill soon. The NCCAOM will keep its Diplomates updated on the bill's introduction, opportunities to support, as well as the bill's continued progress.

In October, the NCCAOM signed a [Coalition letter to CMS](#) that encouraged the Agency to more adequately address and incentivize non-opioid treatment options in its 2020 Outpatient Prospective Payment schedule.

In November, the NCCAOM Advocacy staff attended a hearing that the Coalition and the Third Way hosted a panel on Capitol Hill on methods and initiatives to prevent addiction. Panelists spoke about initiatives they have either launched, supported, or identified as effective methods for reducing opioid addiction.



In December, the NCCAOM advocacy staff participated in a Coalition Hill Day to educate members of Congress on the Coalition's work to include support for the [NOPAIN Act \(HR 5172\)](#) and lend support to legislative initiatives that support non-opioid treatment options.

Mina Larson, M.S., MBA, CAE, NCCAOM CEO, and Molly Giammarco, Senior Manager, Policy & Government Relations, also participated in the Coalition's strategic planning session in December and advocated for increased focus and representation for non-pharmacologic pain-management options. In the meantime, we will also speak with the Coalition's Executive Director, Chris Fox, on ways the Coalition can further promote acupuncture as a pain-management option.

The NCCAOM continues to participate in the monthly webinars hosted by the Coalition and its subsequent ad-hoc discussions. Read more about the [Coalition](#).

American Medical Association (AMA) Health Care Professionals Advisory Committee (HCPAC)

The NCCAOM commends the American Society of Acupuncturists to have been approved as a full member of the American Medical Association (AMA) Health Care Professionals Advisory Committee (HCPAC) in October. ASA's seat on this crucial position will be critical to the participation of our profession on the national healthcare stage and will include the profession's representation and participation on how acupuncture services are coded and billed and will also aid in the creation of new codes. Please read more about this in the [October ASA newsletter](#)

Pain-Management Best Practices Inter-Agency Task Force Draft Report

The NCCAOM issued a [press release](#) in September supporting the [HHS's Pain Management Best Practices Inter-Agency Task Force Report](#). In March 2019, the Advocacy staff and Committee [responded](#) by highlighting specific recommendations around reimbursement, workforce, research, and education in March 2019.



Medical Device Tax Repeal

The NCCAOM signed the Healthcare Leadership Council's (HLC) [stakeholder letter](#) requesting that Congress repeal the medical device tax. The FDA classifies acupuncture needles as class II medical devices, which are subject to medical device taxes. These taxes can be prohibitive to practitioners as well as patients. The NCCAOM Advocacy staff will continue to look for opportunities to collaborate with HLC and fellow stakeholders, as well as monitor advocacy regarding repealing or postponing the medical device tax.

Stop by the [NCCAOM Advocacy Page](#) on our website to learn more about the NCCAOM's advocacy efforts for the profession and our certification. Please contact the [NCCAOM Advocacy team](#) with any questions regarding the NCCAOM's Advocacy efforts and ways to get involved.