

February 19, 2021

The Honorable Tom Coderre  
Acting Assistant Secretary for Mental Health and Substance Use  
Substance Abuse and Mental Health Services Administration  
5600 Fishers Lane  
Rockville, MD 20857

Dear Acting Assistant Secretary Coderre:

The American Society of Acupuncturists (ASA) and the National Certification Commission Acupuncture for Acupuncture and Oriental Medicine (NCCAOM) congratulate President Joseph R. Biden on becoming the 46<sup>th</sup> President of the United States. The President's leadership in healthcare policy and innovation is paramount to the nation's overall wellbeing, and the ASA and the NCCAOM stand by as subject-matter resources in these efforts.

Together, the ASA and the NCCAOM seek to increase awareness of, and access to, acupuncture particularly for pain-management, substance abuse, nausea, post-operative recovery, and mental health issues. Evidence shows that acupuncture is an effective pain-management option for acute- and chronic-pain conditions, as well as for various mental-health conditions. Unfortunately, the service continues to be underused. As the pandemic further exasperates the opioid crisis, access to non-pharmacological pain-management options, such as acupuncture, is critical.

While acupuncture has served as an eastern-medicine technique for thousands of years, it has also begun to develop an evidence base in western-medicine practice. In 2017, the Veterans Health Administration (VHA) recognized acupuncture as a complementary and integrative health service within its Whole Health System of care. As a VHA covered-benefit, beneficiaries have access to acupuncture for acute- and chronic-pain management, post-traumatic syndrome disorder, and wellness applications.

In 2018, the National Institutes of Health cited several acupuncture research studies demonstrating reduced pain and opioid reliance in *Evidence-Based Nonpharmacologic Strategies for Comprehensive Pain Care: The Consortium Pain Task Force White Paper*. This paper cites a randomized-controlled trial that found that, for 300 patients who presented to an emergency department (ED) for acute pain, "...acupuncture was superior to parenteral morphine for pain relief and onset of action with fewer adverse effects." The paper also includes a retrospective study of patients presenting to EDs for acute pain who found that acupuncture reduced "...pain comparable to analgesics with additional benefit of decreased anxiety."<sup>1</sup>

In 2020, the Centers for Medicare and Medicaid Services (CMS) announced a national coverage decision for acupuncture services for chronic lower back pain. Many Acupuncturists, however, have not been able to provide these services because of their status as auxiliary personnel under Medicare.

Still, the acupuncture profession applauds CMS' recognition of acupuncture as an effective pain-management service and continues to work with CMS and members of Congress to increase access to approved acupuncture services and to qualified acupuncturists.

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<sup>1</sup> Tick H, Nielsen A, Pelletier KR, Bonakdar R, Simmons S, Glick R, Ratner E, Lemmon RL, Wayne P, Zador V; Pain Task Force of the Academic Consortium for Integrative Medicine and Health. Evidence-Based Nonpharmacologic Strategies for Comprehensive Pain Care: The Consortium Pain Task Force White Paper. *Explore* (NY). 2018 May-Jun;14(3):177-211. doi: 10.1016/j.explore.2018.02.001. Epub 2018 Mar 1. PMID: 29735382.

In recent years, several state Medicaid programs that cover acupuncture services have reported improved health outcomes for beneficiaries and rerouted pain-management pathways from opioid use and/or surgery. The 2017 Rhode Island Integrative Pain Medicaid Pilot found that acupuncture provided a 27-percent reduction in per member/per year total average medical costs.

Additionally, ED visits in Rhode Island fell by 61 percent, overall prescriptions decreased by 63 percent, and opioid prescriptions fell by 86 percent. The Pilot also found that every \$1 spent on complementary and alternative medicine saved \$2.41 in medical expenses.<sup>2</sup>

The National Governor's Association's (NGA) 2020 white paper, *Expanding Access to Non-Opioid Management of Chronic Pain*, recognizes acupuncture as a multi-modal pain treatment and calls for states to consider "...current evidence, coverage and access for non-opioid therapies and nonpharmacological interventions..." such as acupuncture. The NGA also calls for states to include acupuncture and other non-opioid interventions for chronic pain management.<sup>3</sup>

Demand for acupuncture services grows, as evidenced by its efficacy against pain, cost effectiveness, and portability. Many Americans, however, with the greatest need cannot access this medicine due to a lack of awareness of acupuncture and policies that inhibit access to acupuncture services.

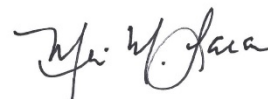
The ASA and the NCCAOM continue to work to increase access to acupuncture services and seek the Biden Administration's partnership in this effort to reach underserved and under-resourced communities. The acupuncture profession is ready to meet the demand for its services and the ASA, and the NCCAOM look forward to working with the Administration on this effort to increase access to evidence-based non-opioid treatments for pain.

Please contact Amy Mager, ASA Public Policy Vice Chair: [VCPublicPolicy@asacu.org](mailto:VCPublicPolicy@asacu.org) or Molly Giammarco, NCCAOM Senior Manager for Policy & Government Relations: [mgiammarco@thenccaom.org](mailto:mgiammarco@thenccaom.org) with any questions.

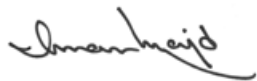
Sincerely,



Olivia Hsu Friedman, DACM, Lac  
Chair, American Society of Acupuncturists



Mina M. Larson, M.S., MBA, CAE  
Chief Executive Officer, NCCAOM®



Iman Majd, MD, MS, EAMP/L.Ac, Dip. ABFM,  
ABoIM, Dipl. Ac. (NCCAOM)®, DABMA  
Chair, NCCAOM®

<sup>2</sup> Advanced Medicine Integration Group, L.P. Integrated Chronic Pain Program: Summary of Results. 2017.

<https://www.integrativepractitioner.com/practice-management/news/rhode-island-integrative-pain-medicare-pilot-shows-significant-savings>

<sup>3</sup> National Governors Association. *Expanding Access to Non-Opioid Management of Chronic Pain*. August 2020.

<https://www.nga.org/center/publications/expanding-access-non-opioid-management-chronic-pain/>