



On behalf of the North Carolina Association of Acupuncture and Oriental Medicine (NCAAOM), we respectfully request that you remove the North Carolina Acupuncture Licensing Board from Bill Draft 2015-TQz-40 (v.7) before the Joint Legislative Administrative Oversight Committee for the following reasons:

Currently in North Carolina there are 535 licensed acupuncturists. If the legislature eliminates acupuncture licensing, these 535 North Carolina citizens could be forced to close their practices which would have a negative impact on economic growth. The vast majority are private citizens who support their local community as well as our state.

- If the practice of acupuncture is allowed to continue without proper oversight, North Carolina could have unqualified practitioners, particularly acupuncturists who have lost their license in other states, move to here taking jobs from the good citizens of North Carolina who hold a valid license. This would also put the public at great risk as acupuncture is an invasive medical procedure.
- **The original information supplied to the committee which led to NCALB being in this Bill was inaccurate.**
  - A) They were given the wrong financial information in terms of board solvency.**
  - B) They were also given the wrong (low) number of L.Acs in North Carolina.**
- The practice of acupuncture is a medical profession that needs an independent board to protect the public. North Carolina acupuncturists are required to have a minimum 2000 hours of training, 650 of those hours are supervised clinical training. A number of licensed acupuncturist have as much as 3000 hours with a master degree in Oriental medicine. All must have graduated from an accredited institution and receive national certification from The National Certification Commission for Acupuncture and Oriental Medicine. 40 hours of continuing education is required every other year to maintain licensure. These standards are mandated by North Carolina statute to protect North Carolina citizens.
- People who are not qualified practitioners of acupuncture cannot legally purchase FDA-regulated acupuncture needles: The U.S. Food and Drug Administration (FDA) strictly regulates acupuncture needles as a Class II medical device and has explicitly stated that the sale of acupuncture needles “must be clearly restricted to qualified practitioners of acupuncture as determined by the States.” 61 Fed.Reg. 64616 (Dec. 6, 1996); 21 CFR § 880.5580(b)(1). North Carolina must have regulations on the use of acupuncture needles.

As President of NCAAOM, I believe it is in the best interest of North Carolina citizens to maintain an independent licensing board to regulate the practice of acupuncture. No other state in the country has ever eliminated an acupuncture licensing board. My hope is that you will seriously consider these facts and remove The North Carolina Acupuncture Board from this Bill.

Sincerely,

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NCAAOM President