



July 13, 2020

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Director

National Center for Complementary and Integrative Health

National Institutes of Health

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Dear Dr. Langevin:

The American Society of Acupuncturists (ASA) and National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)[®] appreciate the opportunity to respond to the National Center for Complementary and Integrative Health's (NCCIH) request for comments on its 2021-2026 Strategic Plan [NOT-AT-20-013].

Together, the ASA and the NCCAOM represent over 20,000 professional acupuncturists across the United States. The ASA and NCCAOM applaud NCCIH for emphasizing Whole Person Health and defining "through rigorous scientific investigation, the usefulness and safety of complementary and integrative interventions and their roles in improving health and health care."

Throughout the millennia, acupuncture has taken a biopsychosocial approach to healing and wellness and focuses on physical, mental, and emotional issues related to our patient's illnesses. An ideal healthcare model starts and ends with the patient. Healthcare today encourages individuals to seek care only when sick. The ideal care model should focus on lifestyle and wellness, in addition to treatment that incorporates and embraces non-pharmaceutical and non-invasive interventions to mitigate illness and disease. Acupuncturists' obligation as leaders in the field of complementary and integrative health is to work preemptively to maintain and promote patient wellness, as well as healing.

As NCCIH seeks information to inform its 2021-2026 Strategic Plan, the ASA and the NCCAOM encourage NCCIH to focus more on educating and informing the public about options for preventive care and wellness, as well effective, safe, and accessible non-pharmaceutical, non-invasive treatments.

The ASA and the NCCAOM respectfully recommend that NCCIH consider adding or revising the following points within each of its five 2021-2016 Strategic Plan objectives.

Objective One: Advance Fundamental Science and Methods Development

- Advance understanding of basic biological mechanisms of action of natural products, including Traditional Chinese Medicine components.
- Advance understanding of the mechanisms through which mind-and-body approaches affect health, resiliency, and well-being.
 - Initiate more focused research strategies from mechanisms of action to Comparative Effectiveness Research to help payers recognize effective therapies to cover. This would increase access to complementary and integrative healthcare services.
 - Facilitate data to help increase payer recognition to enable the complementary and integrative healthcare workforces to expand.
- Develop new and improved research methods and tools for conducting rigorous studies of complementary health approaches and integrating them into mainstream healthcare.
 - Focus less on sham acupuncture and more on outcomes-based research.
 - Devote more funding to clinical acupuncture research that more fully reflects actual treatment with Nationally Board Certified and licensed acupuncturists, as well as physician acupuncturists, as principal investigators or co-leads on these studies.
- Include licensed acupuncturists on NCCIH's National Advisory Council.
- Remove barriers to non-MD clinicians, such as licensed acupuncturists, from becoming Primary Investigators.
 - The ASA and the NCCAOM recognize that the current literature pertaining to acupuncture is limited because many studies do not meet standard criteria for systematic, evidence-based research. This creates a glaring gap in both evidence and knowledge.
 - Evidence shows that acupuncture is safe, effective, and reliable. More research is necessary to continue to develop this evidence base to increase access to acupuncture, and enable acupuncture to play a bigger role in reducing opioid and pharmacological overreliance. The NCCIH should give careful considerations to:
 - Challenges to evaluating the research include consistency in research design and protocol, methodology, low sample size, and qualitative short- and long-term effects.
 - Due to the very nature of the personal interactions inherent in delivering acupuncture treatment, the standard Randomized Double Blind Control Trial suitable to pharmaceuticals and other medical interventions does not fit well for acupuncture research.
 - Fitting acupuncture into standardized research protocols can reduce its effectiveness, creating a misleading false negative and limiting the body of evidence necessary to support the acceptance of the practice as a legitimate form of medicine.

- All acupuncture research trials also need to document adverse reactions and the methodology for reporting adverse reactions. Given the significant differences in training (e.g. length of time and depth of training), studies should explicitly note the credentials of those who deliver acupuncture treatment for consumer safety and for research-study integrity.

Objective Two: Improve Care for Hard-to-Manage Symptoms

- Develop and improve complementary health approaches and integrative-treatment strategies for managing symptoms such as pain, anxiety, depression and chronic-intractable pain.
- Conduct studies in real-world clinical settings to test the safety and efficacy of complementary health approaches that include acupuncture, and their integration into the U.S. healthcare system.
- Investigate optimal healing of various integrative team structures.
- Shift to Whole Person Health, as the U.S. Veteran’s Health Administration has successfully demonstrated, to realize positive shifts in individual care.
- Fund workforce training and establish best practices to deliver culturally competent care to improve clinical outcomes within underserved communities of color.

Objective Three: Foster Health Promotion and Disease Prevention

- Enhance the NCCIH website to inform the public so the NCCIH website becomes an accessible and informative resource for complementary and integrative health.
- Investigate mechanisms of action of complementary and integrative health approaches—that include acupuncture—in health resilience and practices that improve health and prevent disease.
- Explore and implement research opportunities to study and assess the safety and efficacy of complementary health approaches that include acupuncture in nonclinical settings, such as community and employer-based wellness programs.

Objective Four: Enhance the Complementary and Integrative Health Workforce

- Support research training and career-development opportunities to increase the number and quality of scientists trained to conduct rigorous, cutting-edge research on complementary and integrative health practices. This would enable more practitioners to enter the complementary and integrative health workforce.
- Foster interdisciplinary collaborations and partnerships that include acupuncturists.
- Clarify and possibly create inter-professional communication methodology.¹
 - Complementary and integrative health initiatives cannot occur if practitioners do not communicate and work together to triage a patient’s medical-management or wellness plan.

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6422413/pdf/jmdh-12-191.pdf>
ASA/NCCAOM

- This deficiency has improved drastically with electronic records, but challenges remain when electronic record systems operate in isolation. Integrative medicine clinics frequently experience this challenge as they cannot access hospital software and do not have diagnostics, imaging, and diagnosis information. Subsidies to transition to EMR/EHR were only available to MD's, not to integrative practitioners. Similar programs may help to bridge the gap.
- Technology should support practitioner collaboration across virtual platforms to discuss treatment options. This would reduce expenses for patients with complex conditions and enable them the opportunity for optimal care.
- Fast track the approval process for NCCIH Supplements, as Dr. Edwards described in the May NCCIH webinar, *Whole Person Health: Mapping a Strategic Vision for NCCIH*, to allow expeditious action as necessary for planning and decision making for integrative collaborative work.
- Ensure these funding supplements are readily available for rapid-response teams, as seen during the COVID-19 emergency, for collaborative integrative work.

Objective Five: Disseminate Objective Evidence-Based Information on Complementary and Integrative Health Interventions.

- Reinstated and develop specific efforts to educate the public about integrative health options—such as acupuncture—and help individuals incorporate integrative health components into their medical management and overall wellness.
- Include licensed acupuncturists in the NCCIH National Health Interview Survey (NHIS) to better assess how American adults and children use acupuncture.
 - There needs to be consistent consumer-use studies for acupuncture. NCCIH measures and benchmarks yoga, meditation, and chiropractic care, all of which have increased over time.
 - NCCIH should measure this growth for acupuncture services, as they are a vital part of integrative medicine.
- Encourage medical school training to include education about the different modalities within the complementary and integrative health professions (e.g. naturopathy, acupuncture, etc.).
- Address cost effectiveness of integrative-health approaches as practiced and their associated cost avoidance in hospital systems.
- Develop methods and approaches to enhance public understanding of basic scientific concepts and biomedical research.
 - The NCCIH website is a reliable source for information, but improvements to make it more informative, easier to navigate, and more useful to those seeking information about complementary and integrative health options is necessary.
 - The website should include more resources to help the public learn about integrative health options and find integrative health providers in their areas.

- The website should feature studies demonstrating the effectiveness of various integrative health practices and options for various lifestyle/wellness purposes and specific symptoms and conditions.
- Patients need more resources to navigate the healthcare system, such as questions to ask their healthcare team, and lists of available providers and appropriate treatment options.
- NCCIH should launch an educational campaign to inform the public and establish the NCCIH website as a primary site for complementary and integrative health queries.

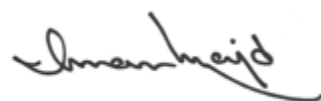
Increasing initiatives that generate data showing the effectiveness of integrative health practices such as acupuncture, increasing access to the complementary and integrative workforce, and providing the public information resources and education around integrative healthcare options should be critical initiatives to the NCCIH's 2021-2026 strategic efforts.

The ASA and the NCCAOM thank Dr. Helene Langevin, Dr. Emmeline Edwards, Dr. David Shurtleff, Ms. Catherine Law, and Ms. Mary Beth Kester for their leadership and appreciate the opportunity to provide feedback to the NCCIH's 2021-2026 Strategic Plan.

Sincerely,



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1. Bokhour, PhD, Barbara, Justin Hyde PhD, Steven Zeliadt PhD, and David Mohr PhD. *Whole Health System of Health - A Progress Report on Outcomes of the WHS Pilot at the Flagship Site*. January 27, 2020.