



March 12, 2021

Helene Langevin, M.D.  
Director  
National Center for Complementary and Integrative Health  
National Institutes of Health  
9000 Rockville Pike  
Bethesda, Maryland 20892

Dear Dr. Langevin:

The American Society of Acupuncturists (ASA) and National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM)<sup>®</sup> appreciate the opportunity to provide feedback on the National Center for Complementary and Integrative Health's (NCCIH) 2021-2025 Strategic Plan draft.

Together, the ASA and the NCCAOM represent over 20,000 professional acupuncturists across the United States. The ASA and NCCAOM applaud the NCCIH for emphasizing whole-person health and research, as well as the importance of integrating complementary and conventional healthcare.

Throughout the millennia, acupuncture has taken a biopsychosocial approach to healing and wellness to focus on physical, mental, and emotional issues that affect illness and health. An ideal healthcare model starts and ends with the individual. It also includes lifestyle and wellness, in addition to appropriate treatments that incorporate and embrace non-pharmaceutical and non-invasive interventions. Acupuncturists are leaders in the complementary and integrative health field and work to preemptively maintain and promote patient wellness and healing.

The ASA and the NCCAOM commend the NCCIH for incorporating many critical and forward-thinking elements into its strategic plan and appreciate the opportunity to suggest items for the NCCIH to include in its 2021-2025 Strategic Plan.

*Emphasis on Whole-Person Wellness and Natural Products*

The ASA and the NCCAOM applaud the NCCIH for developing a thoughtful, reader-friendly strategic plan that takes a big-picture approach to discovering, promoting, and advocating for integrative, whole-person health. The public's and the healthcare workforce's appreciation for, and interest in, non-pharmaceutical methods to symptom-management and wellness activities continues to grow. The NCCIH's actions in the next five years are vital to supporting, facilitating, and encouraging this growth.

The NCCIH's intent to better understand and communicate how natural health and wellness products and other medicines and treatments can interact and affect each other will also help increase awareness of, and comfort with, natural products. The ASA and the NCCAOM applaud the NCCIH's support for a Center of Excellence for Natural Product Drug Interaction Research to conduct human-subject studies that shed more light on clinical relevance of natural-product interactions.

Acupuncturist training includes Chinese Herbal Medicine, and the ASA and the NCCAOM appreciate the NCCIH's acknowledgement of natural products' role in health, and wellness, especially as they become more prominent in healthcare delivery.

#### *Recognition of Acupuncture's Role in Complementary and Integrative Health*

The ASA and the NCCAOM applaud the NCCIH for recognizing acupuncture's role in dietary, psychological, and physical approaches to whole health, pain-management, and illness-abatement. The NCCIH draft Strategic Plan's acknowledgement of the complementary role acupuncture has with western medicine is critical as more healthcare models incorporate acupuncture and cite it as an effective and valued pain-management and wellness intervention.

#### *Research Promotion, Expansion, and Design*

The NCCIH Strategic Plan draft appropriately addresses the need for more integrative-health research and recognizes the critical role that those in the field have in designing, leading, and conducting this research. Encouraging and equipping clinicians (e.g. acupuncturists) to conduct research will facilitate critical data-collection, provide valuable insight into health and wellness treatments among diverse patient populations, and facilitate more interdisciplinary relationships at individual and institutional levels. This focus complements the efforts to encourage translational research into how various psychosocial systems interact—especially with regard to pain-management strategies.

The NCCIH's plan to advance basic and mechanistic research relevant to dietary, psychological, and/or physical approaches to help develop strategies for studying interactions among complementary and integrative health is also laudable. Research already shows that acupuncture is a complementary treatment in many applications. The NCCIH's strategic goals would help to identify more ways that integrative applications can serve in this capacity and help increase awareness of, and access to, acupuncture and other effective non-pharmaceutical options.

The NCCAOM and the ASA also applaud the NCCIH's plan to promote strategies to create a more diverse integrative-health workforce. This initiative complements the acupuncture profession's diversity initiatives, and collectively, these efforts will help reach diverse patient-populations

Lastly, the ASA and the NCCAOM agree with the NCCIH's intent to create effective methods for disseminating evidence to clinicians, patients, hospitals, and payers. Developing a protocol for educating and communicating integrative health and wellness methods is critical to increasing awareness and acceptance of, as well as access to, these services—for both clinicians and patients.

#### *The ASA's and the NCCAOM's Recommendations to NCCIH*

While the NCCIH 2021-2025 Strategic Plan draft is comprehensive and forward-thinking, the ASA and the NCCAOM respectfully request that the NCCIH consider incorporating the following into its 2021-2025 Strategic Plan:

- Effective methods to provide pathways, education, guidance to acupuncture and other evidence-based services for whole-person/wellness purposes to physicians, nurse practitioners, and other healthcare practitioners.
- Targeted education on services for wellness and proactive health and multi-faceted strategies for creating and disseminating educational materials to patients, practitioners, payers, and hospitals.

The Florida Board of Medicine's [Non-Opioid Alternatives Pamphlet](#) is an example of effective public-education communications.

- Resources for educating students on choosing careers in integrative-health fields, such as acupuncture and Chinese Herbal Medicine.

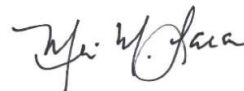
The ASA and the NCCAOM are eager for the NCCIH to realize this strategic pathway, which aligns with many of the acupuncture profession's strategic goals. The NCCIH's embrace of whole-person health and wellness, natural-wellness products, research expansion and enhancement, and awareness and acceptance of integrative-health measures is a significant step toward enhanced integrative-health delivery, research, and discovery.

The ASA and the NCCAOM thank the NCCIH for its leadership and appreciate the opportunity to provide feedback to the its five-year vision. As the NCCIH finalizes and implements its 2021-2025 Strategic Plan, the ASA and the NCCAOM stand by as subject-matter experts and advocates.

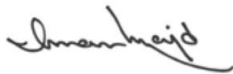
Sincerely,



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,  
ABolM, Dipl. Ac. (NCCAOM)®, DABMA  
Chair, NCCAOM®