



Public Protection Through Quality Credentials

## MEMORANDUM

**DATE:** September 8, 2013

**TO:** Executive Directors of AAAOM, ACAOM, CCAOM and President of CSA and other State Association Leaders

**FROM:** Dr. Kory Ward-Cook

**CC:** NCCAOM® Board of Commissioners

**RE:** Status on Filing of Standard Occupational Classification (SOC) for Acupuncturists with Bureau of Labor Statistics (BLS)

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### Introduction:

The National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM®) has been working continuously over the past six years in with the BLS to gain recognition through the [Standards Occupational Classification \(SOC\)](#) system. Starting in 2008, the NCCAOM collaborated with the American Association of Acupuncture and Oriental Medicine (AAAOM), the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM), the Council of Colleges for Acupuncture and Oriental Medicine (CCAOM), Federation Acupuncture and Oriental Medicine Regulatory Agencies (FAOMRA), and the National Acupuncture Foundation (NAF) to submit a request to the Bureau of Labor Statistics (BLS) to have “Acupuncturists” classified as a unique profession under the SOC codes.

The NCCAOM coordinated this effort by coordinating a collective response to the BLS’ public call for changes to the SOC in July of 2008. Together, these national organizations requested that “Acupuncturists and Oriental Medicine Practitioners” be granted a unique, independent occupational code. In January 2009 NCCAOM received communication a notification in the form of *the Federal Registry* public notice via email regarding the Office of Management and Budget’s (OMB) final decisions for changes in the next round of occupational codes in the [2010 SOC system](#). To read the full copy of this notice, please go to <http://www.bls.gov/soc/soc2010final.pdf>. This communication gave a brief summary of some of the inclusions of the 2010 SOC system; however, there was initially no explanation as to the status of the inclusion of Acupuncturists. The email also stated that we would receive a formal communication with the decision of the BLS to include or exclude “Acupuncturists” as a distinct profession.

As we did not hear back from them several months later, NCCAOM contacted the BLS office and subsequently received feedback below:

- The Office of Management and Budget (OMB) and the Standard Occupational Classification Policy Committee (SOCPC) did not accept the AOM professional

organizations' request to add **Acupuncturist** as a separate detailed occupation to the 2010 SOC. The SOCP's rationale for this decision is available via this link: [http://www.bls.gov/soc/2010\\_responses/response\\_multiple\\_docket\\_5.htm](http://www.bls.gov/soc/2010_responses/response_multiple_docket_5.htm).

A rationale of the above decision stated that the SOCP was primarily based on their belief that there will be difficulty in tracking "**Acupuncturists**" in other professions besides the AOM profession. These other recognized professions included chiropractors, MDs, etc.. Please note that the SOC is a task-based classification; therefore, the Committee does not differentiate occupations based on education or certification, but rather on the work being performed. Therefore, any future submission must clearly differentiate "**Acupuncturists**" from other occupations using "acupuncture" or Chinese herbs as a modality of treatment.

- The OMB and SOCP, also, did not accept the request by the AOM national organizations to add "Acupuncture and Oriental Medicine Practitioner". They stated that "Oriental medicine" is not uniformly defined as a field, and aspects of Oriental medicine are practiced widely by other healthcare providers in more than one SOC occupation. The SOCP's rationale for this decision is available via the link below: [http://www.bls.gov/soc/2010\\_responses/response\\_08-0462.htm](http://www.bls.gov/soc/2010_responses/response_08-0462.htm).

After the above decision, to not include Acupuncturists as an independent occupation because it did not meet the required Principle 9 (tasks found in other professions with a code) was published, it was later determined by the BLS and supported by the Employment and Training Administration, that there should be an ongoing collection of occupational information on acupuncturists through the O-Net tracking system. See [Occupational Information Network \(O-NET\) Data Collection Program](#). This is a very positive step taken by the BLS and the Employment and Training Administration as this data collection process should increase the potential for "**Acupuncturists**" to have an independent occupational code in the next SOC publication. Announcements and preparations for the next round of SOC changes will begin in late 2013 or early 2014.

### **Current Status of "Acupuncturists" as Recognized by the BLS and the Employment and Training Administration:**

The BLS has identified Acupuncturists as an [O-NET "New and Emerging Profession"](#) and as a result, data is being collected by O-NET. The data collected will support the AOM national organizations' next request submission for a new SOC classification for Acupuncturists for the next publication. Decisions for the next set of SOC codes will be published in 2015.

The SOCP meets periodically to maintain the accuracy of the online "Direct Title Match File", which directly matches titles of professions to a category and code to the 2010 SOC. It is for this reason the NCCAOM sent in a written request to the SOCP for "**Acupuncturists**" to be considered for inclusion in the first edition of the Direct Match Title File. This request, sent June 23, 2009, recommended that Acupuncturists be listed under code "**29-1199.99 - Health Diagnosing and Treating Practitioners, All Other**". Based on all of the available categories for the field of healthcare, we thought this classification was the best fit for the acupuncture and

Oriental medicine profession. Serendipitously, It turned out that the SOCP also recommended this code category for "**Acupuncturists**". In addition, this category will prevent acupuncture from being listed under other healthcare professions (such as chiropractors, nurses, etc.) as a modality. Please see link: <http://online.onetcenter.org/link/summary/29-1199.99>. Therefore, The U.S. Census File also categorized "Acupuncturists" under this category in 2010. Please see link: [http://www.census.gov/people/io/files/occ02\\_pdf.pdf](http://www.census.gov/people/io/files/occ02_pdf.pdf).

### **Next Steps:**

The next major review and revision of the SOC is expected to begin in late 2013 in preparation for the publication of the 2018 SOCs (announced in 2015). The BLS has recently added a timeline for submitting proposals on their website. See the following link: <http://www.bls.gov/soc/#revision>.

The SOCP has recently prepared guidelines for those submitting proposals so that they can use this information to develop recommendations to OMB. They have stated that the bulk of the information that is likely to be submitted to the OMB will come from the comments received in response to the *Federal Register* notices. Thus, the SOCP encourages potential commenters to carefully review the information provided in "[Input Requested by the SOC Policy Committee](#)," which is a section of "[Revising the Standard Occupational Classification](#)," a larger document that more fully describes the history and structure of the SOC. All comments should be submitted as responses to the *Federal Register* notices, using the submittal procedures described in the notices. This will ensure comments and recommendations are included on the dockets that the SOC Policy Committee will review.

The next steps for the AOM national organizations are to prepare our case for the 2013 call for proposals to BLS's Standard Occupational Classification Policy Committee (SOCP). We need to address the areas that are being tracked by the O-NET and also look at other occupations that provide acupuncture services or treatments (e.g. Chiropractors, MDs, nurses, etc.). We need to distinguish "**Acupuncturists**" from other health care providers providing acupuncture treatments. Hopefully the tracking services provided by O-NET will strengthen our case for the inclusion of a standard occupational classification for Acupuncturists in 2018 (decision will be made in 2015, implemented in 2018).

The Acupuncture profession has been acknowledged by the BLS as a result of our filing in 2009, as well as our follow up requesting a listing in the Direct Match Title tracking. The above activities were the first major steps to receive federal recognition by the BLS, now we should be coming down the home stretch by submitting our final request for an independent code.

The NCCAOM will notify all of you again with the first draft of submission to the BLS for you all to review. The draft will be sent to all of you following the final Federal Register notification, which should occur before the end of 2013. If you have any questions or need further explanation please do not hesitate to contact me at [kwardcook@thenccaom.org](mailto:kwardcook@thenccaom.org) or Mina Larson at [mlarson@thenccaom.org](mailto:mlarson@thenccaom.org).