Introduction:
As a result of the interest by various California stakeholder groups and the decision of the California Acupuncture Board (CAB), in June of 2016, to use the NCCAOM entry-level certification examinations as one of the entry-level requirements for licensure in California as early as 2019, the NCCAOM has prepared this fact sheet to familiarize California stakeholders with the development, administration, reliability and validity of the NCCAOM examinations, and to provide updated information about the next steps for the CAB to begin utilizing the NCCAOM exams for licensure in CA. This fact sheet also describes the Commission’s longstanding partnership with state regulatory boards and agencies responsible for licensing acupuncturists throughout the United States.

The NCCAOM examinations and certification programs are based on best practices in the certification industry and meet the testing and certification program standards of the National Commission on Certifying Agencies (NCCA), an independent accreditation commission of the Institute for Credentialing Excellence.

Questions or comments related to this fact sheet should be directed to Dr. Kory Ward-Cook, Chief Executive Officer, at kwardcook@thenccaom.org.
Q. (1) How have the NCCAOM examinations changed since 2003 when the exams were first evaluated by the California Little Hoover Commission?

A. (1) Since 2003, based on data obtained from the 2003, 2008, and 2013 Job Task Analyses (also known as an occupational analysis (OA) or practice analysis), the NCCAOM has made extensive changes and significant improvements to its examination and certification processes, including:

- Created a modular examination system consisting of four modules (Foundations of Oriental Medicine (FOM), Acupuncture with Point Location (ACPL), Chinese Herbology (CH), and Biomedicine (BIO) at the request of states, because of varying scope of practice laws, ensuring that candidates have successfully passed each module before achieving licensure and/or certification. These examinations have been in place since 2004.

- Introduced the Oriental Medicine Certification program in 2004, which requires passing all four exams.

- Created and implemented the BIO examination in June 2004 and required all candidates to pass this examination as a requirement for certification. In 2010, as a result of the 2008 Job Analysis Survey, the NCCAOM increased the length of the Biomedicine exam from 50 to 100 items.

- Validated Knowledge, Skills, and Abilities statements (KSAs) and subsequently added competency statements. These are reflected in the development and publication of all examination content outlines since 2008. The 2017 Job Task Analysis and the 2017 Exam Content Outlines are available on the NCCAOM website. Note: The NCCAOM will publishing the next set of examination content outlines, for use in 2020, by July 1, 2018.

Q. (2) What changes have occurred regarding the administration of the NCCAOM examinations since 2003?

A. (2) In 2007, the NCCAOM changed exam administration format to computer adaptive testing.
(CAT), which not only improves examination reliability, but also reduces the potential for cheating by minimizing test question exposure, because every examinee receives a unique set of test questions based on the examinee’s responses and the test specifications. CAT allows every examination to be scored in real time, and thus a preliminary “pass” or “fail” screen is generated once the test taker completes the examination. NCCAOM examinations are now administered year-round in highly secure professional test centers throughout the U.S. and around the world. Year-round testing enables candidates that are approved to test by the NCCAOM to register for the NCCAOM examination(s) throughout the year, pending availability at their desired Pearson VUE Professional Test Center location. Almost all examinees have a Pearson VUE Professional Test Center within 50 miles of their home or work. These professional test centers hire only Pearson VUE employees and construct each center with identical specifications to ensure the highest security and a standardized testing experience for all candidates. Candidate identity is confirmed by means of palm vein readings and photo identification. Tight internal test administration processes, which include camera surveillance of each test taker, prevent cheating during the examination process. The NCCAOM follows up with an internal quality control procedure, and the final test results are typically sent to the examinee within ten business days. The NCCAOM generates official exam results reports, which are sent directly the state regulatory boards upon the examinee’s request. The 2018 NCCAOM® Certification Handbook and the 2018 NCCAOM® Candidate Preparation Handbooks provide more detailed information about the examination development and administration processes. Please note that on occasion the NCCAOM must administer linear examinations, during certain designated time periods of the year. Foreign language examinations are always administered in linear format.

The NCCAOM is also assisted by Schroeder Measurement Technologies (SMT®), a national research and psychometric services corporation that conducts professional competency assessment research and provides examination development services and scoring of examinations for a number of credentialing programs nationwide. The NCCAOM has demonstrated over the last 30 years, with its issuance of over 28,000 certificates of certification, that it is well equipped to handle the challenges associated with the development and administration of a credible, valid, and legally defensible examination system for the acupuncture and Oriental medicine profession.
Q. (3) Once the NCCAOM exams becomes a requirement for state licensure, will current California Licensed Acupuncturists then be required to take the NCCAOM exams?

A. (3) No. Adding the option or requirement of NCCAOM exams will allow new candidates who are applying for licensure in California the opportunity to take the NCCAOM exams as a route for California licensure. It will have no impact on currently licensed California acupuncturists.

Q. (4) Once the NCCAOM exams becomes a requirement for state licensure, would current California Licensed Acupuncturists who are not certified with the NCCAOM then become NCCAOM Diplomates?

A. (4) The NCCAOM is actively working on setting up a route to certification for currently Licensed Acupuncturists in California. The NCCAOM must abide by the requirements of the National Commission on Certifying Agencies (NCCA) in order to maintain accreditation of its certification programs. The NCCA requires that all NCCAOM certified practitioners meet the same level of competence which is demonstrated by meeting eligibility requirements and passing a valid and reliable examination(s). The 2016 audit of the NCCAOM Exam Development, Administration and Linkage Study (please see California Acupuncture Board February 2016 Agenda Materials: Results of NCCAOM Audit) will provide some of the data needed for the NCCAOM to request for the NCCA Board to determine if the California Acupuncture Licensing Exam (CALE) is a substantially equivalent measure of the combined knowledge on the Foundations, Biomedicine, Acupuncture with Point Location, and the Chinese Herbology examinations. The psychometric data (to determine reliability and validity) will most likely need to be obtained from the Department of Consumer Affairs (DCA) Office of Professional Examinations Services (OPES) for the CALE administrations during the last few years. Because California Licensed Acupuncturists have met educational and training requirements and have successfully passed an examination as a requirement for licensure, the NCCAOM would have to demonstrate that California's and NCCAO's eligibility requirements are equivalent, and that the CALE is equivalent to the NCCAOM exams, based on a review and analysis by an independent psychometrician and designated subject matter experts. If this demonstration were met, then the NCCAOM could proceed with developing a pathway for active California Licensed Acupuncturists to become NCCAOM certified, by a “reciprocal certification” route. The NCCAOM has sent a
letter and supporting documents to the NCCA for this purpose and initial review and response from the NCCA is promising. The NCCAOM is hoping to have this process completed by mid-2018.

Q. (5). Aren’t the NCCAOM exams “too easy”?

A. (5) Not at all. Over the past seven years, the NCCAOM has continued to build a very robust set of item banks for all its examinations, including a significant increase in the number of items that measure higher Bloom’s Taxonomy levels and require more clinical judgement. The NCCAOM also modified the content of the exams based on the 2008 Job Task Analysis (please see the NCCAOM® 2008 Job Task Analysis Study: A Report to the Acupuncture and Oriental Medicine Community), which has resulted in the modular examinations with more breadth and depth of content. As a result of these examination development activities, the amount of content tested is now 400 exam items (each 100-multiple choice exam module must be independently passed to receive certification as a Diplomate of Oriental Medicine). The CALE covers similar content in a single comprehensive examination of 250 items. In June 2016 a motion by the California Acupuncture Board (CAB) recommended that candidates for licensure in CA take all four of the NCCAOM examinations, plus a separate state specific exam covering additional content deemed essential for candidates for licensure as acupuncturists in CA, no earlier than January 1, 2019.

The current NCCAOM examination content outlines, which are based on the 2013 Job Task Analysis, are available on the NCCAOM website. The new content outlines which will take effect in 2020 will be published before July 1, 2018, based on the results of the NCCAOM’s 2017 JA Survey in which over 3,200 acupuncturists participated.

The graph on the next page shows the 2012 - 2016 annual pass rates for all candidates by NCCAOM examination: Foundations of Oriental Medicine (FOM), Acupuncture with Point Location (ACPL), Chinese Herbology (CH), and Biomedicine (BIO).
The exam pass rates for the individual examinations, broken down by the type of test takers, for the past seven years, can be accessed via the NCCAOM website under “Visitors” and “Schools” titled “NCCAOM Examination Statistics Comparison Report”. In the case of the Biomedicine exam, the breadth and depth of the content has significantly increased since 2004. Since 2010 the Biomedicine examination module has been administered as a 100-item test (from 2004 through 2009 it was administered as a 50-item test).

Q. (6). Are there national standards for verification of entry-level competencies for licensed acupuncturists?

A. (6) Yes. Since 1982 the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM) and the NCCAOM have established national standards leading to programmatic accreditation and certification, respectively. There are over 60 ACAOM accredited programs for acupuncture and Oriental medicine (AOM) in the U.S., and the NCCAOM currently provides examinations for licensure as an acupuncturist in 46 states, plus the District of Columbia. Every acupuncture regulatory board in the U.S. except California accepts the NCCAOM certification examinations as a measure of entry-level competency for an acupuncturist to legally practice in
their state. Adherence to these standards ensures the safe and effective practice of AOM in these states. More information about national standards of competency of acupuncturists can be found via the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM®) Fact Sheet: Meeting National Standards through its Examinations and Certification Process. For more information regarding the NCCAOM testing and certification process, please see the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM®) Fact Sheet: NCCAOM Certification and Testing Program. More information on NCCAOM policy and procedures can be found in the 2018 NCCAOM® Certification Handbook.

Q. (7). How many states that regulate acupuncture use the NCCAOM exams?

A. (7) There are 46 states plus the District of Columbia (i.e. ninety-eight percent of the states that regulate acupuncturists) that recognize NCCAOM examinations or full certification as a prerequisite for licensure. The AOM regulatory boards of these states typically require passing of two to four NCCAOM exams or require full NCCAOM Certification in Acupuncture or Oriental Medicine. Three states (Alabama, Oklahoma, and South Dakota) currently do not have an AOM practice act. Please see the map titled States Using NCCAOM Certification or Exams for Acupuncture Licensure. California is the only state that administers its own licensure examination. This means that AOM practitioners who pass the required NCCAOM examinations and/or become NCCAOM certified in Acupuncture or Oriental Medicine (and who have met state-specific requirements*) can enjoy greater portability to all states that regulate acupuncture, except for California. In 2012, an estimated 40% of newly licensed California acupuncturists took the NCCAOM exams in addition to the CALE. In 2015, NCCAOM received 311 applications for certification from individuals enrolled in a California ACAOM accredited or candidate program. According to the Examination Statistics on the CAB website there were 598 candidates who took the CALE In 2015. It appears that currently approximately 50% of the CALE candidates for licensure also applied for the NCCAOM examinations, a 10% increase compared to 2012. This demonstrates that there is a significant interest in graduates from CA accredited/candidate programs desiring to take the NCCAOM examinations and become certified.
*Please note: Applicants for licensure may have to complete additional requirements in some states in addition to achieving NCCAOM certification or passing NCCAOM examinations. Applicants for licensure are advised to check with the state agency that regulates acupuncture in the state in which they wish to practice to ensure that they have met all state designated requirements. For more information, please visit the [NCCAOM website](https://nccaom.org) for a listing of state exam requirements and state regulatory contact information.)*

State regulatory boards requiring a state specific licensing exam in addition to using the NCCAOM national exams are:

- **Texas** – State Jurisprudence Exam
- **Nevada** – State Practical Exam
- **New Mexico** – State Jurisprudence or Legal Exam
- **New Jersey** – Acupuncture Safety and Jurisprudence Exam
- **Idaho** – Blood Borne Pathogen course and comprehensive examination that incorporates clean needle techniques and OSHA procedures and requirements
- **California** – *NOTE:* It is anticipated that a CA-specific supplemental examination will be administered once the CAB begins requiring the NCCAOM exams for licensure.

**Q. (8). Has the NCCAOM national examination system ever been legally challenged?**

**A. (8)** No. No legal action has ever been brought against the NCCAOM examinations. The NCCAOM has developed a very fair and legally-defensible examination program that tests for competency of entry-level skills and knowledge. States can rely on the NCCAOM for legal defensibility of the exams. The assurance of longstanding defensibility is one of multiple reasons why 98% of the states in the U.S. that regulate acupuncturists use the NCCAOM exams as a prerequisite for licensure. All NCCAOM certification programs are accredited by the [Institute for Credentialing Excellence’s (ICE) National Commission for Certifying Agencies (NCCA)](https://nccacredentialing.org). The NCCAOM examination development and certification processes for each of its certification programs have met all the essential elements of a nationally accredited certification program.
Q. (9). What about candidates who wish to take the exams in another language?

A. (9) The NCCAOM certification examinations are available in three languages: English, Chinese, and Korean. There have been no challenges to the translation of the NCCAOM foreign language examinations. The NCCAOM takes great pride in the proper translation of its examinations. All examination questions used for foreign language examinations are first translated from English to Chinese or Korean by an independent, third-party-accredited, translation company. Next, the NCCAOM Translation Exam Development Committee, consisting of subject-matter experts (SMEs) who have as their first language Chinese or Korean, provide quality control checks (i.e., back translation of each exam question). Finally, once the foreign language exams are administered, and before they are scored, the NCCAOM psychometrician conducts a fit analysis to ensure that each exam item is functioning like the English version; otherwise it will not be used for scoring the exam. Although the number of candidates registering to take the NCCAOM exams in Chinese and Korean has significantly diminished in the last few years, the NCCAOM always has the capacity to administer foreign language examinations any time there is sufficient demand.

The NCCAOM Foreign Language Exams are now the same price as all other exams. Please see Applicant Fees page on the NCCAOM website. Traditionally, the Foreign Language Exams were higher due to the extensive exam development required for these exams; however, the NCCAOM will be absorbing these costs to increase accessibility. Below is a fee chart for applications and all exams.

**NCCAOM Examination and Application Fees**

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<tr>
<td>Application and Exam Fees</td>
<td>OM Application + Candidate Status for FOM + BIO + ACPL + CH</td>
<td>Exam Fees English and Foreign Language</td>
<td>Total Cost</td>
<td>CALE</td>
<td>Exam Fees English and Foreign Language</td>
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<td>OM Candidate Application Cost – Compared</td>
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to CALE Application | Foundations of OM (FOM) Exam | $300
---|---|---
| Biomedicine (BIO) | $300
| Acupuncture with Point Location (ACPL) | $300
| Chinese Herbology | $300
| CALE Exam | $595 | $1200 | $75 | $550 | $1,795 | $625

* Examination fees are payable by Credit Card to the Pearson VUE testing center at the time of scheduling.

Please note: The NCCAOM foreign language exams are administered as computer-based linear exams, not computer adaptive tests.

**Q. (10). Will requiring the NCCAOM exams lower California licensure standards?**

**A. (10)** The requirement of NCCAOM exams has no bearing on other existing licensure standards in California. The NCCAOM partners with 46 state regulatory boards which have various additional standards, to include different educational requirements, or additional state-specific competency examinations so that each state ensures that each of their licensees have met entry-level competency standards to practice acupuncture and Oriental medicine safely. In fact, Nevada requires 4,000 hours of didactic and clinical education and requires the NCCAOM exams as a prerequisite for licensure. The NCCAOM’s main role with state regulatory agencies is to administer a psychometrically defensible, valid and reliable assessment tool that effectively measures the knowledge, skills, and abilities (KSAs) required for safe and effective AOM practice. Each state regulatory body remains responsible for setting and enforcing its own state licensure standards.

The California Acupuncture Board would continue to set their unique standards (including educational and additional competency requirements) for licensure of California acupuncturists. NCCAOM Diplomates who have never received a license to practice as acupuncturists in CA, would still have to meet the CAB educational standards and pass
any additional competency examination required by the CAB. The CAB is recommending to the legislature that an additional state-specific exam (content not covered on the national entry-level certification exams, such as a CA laws or jurisprudence examination) be additionally passed for any candidate for licensure as an acupuncturist in CA.

Each of the 46 states plus the District of Columbia that utilize the NCCAOM examinations recognize the financial and administrative benefits of requiring NCCAOM certification or passing of the NCCAOM examinations as a prerequisite for licensure of acupuncturists. All examination development and administration costs, as well as legal defensibility, are assumed by the NCCAOM.

Q. (11). How can a national examination system such as the NCCAOM satisfy the variety of practice acts and scopes of practice for each state that regulates AOM?

A. (11) NCCAOM's modular examination system allows each state to adopt the exams that are tailored to its AOM practice act requirements, statutes, rules, and regulations. NCCAOM offers four exams for the AOM profession: Foundations of Oriental Medicine, Acupuncture with Point Location, Chinese Herbology, and Biomedicine. State regulatory agencies require either all or a portion of these examinations, depending on their practice act and whether their state regulates the practice of Chinese herbal medicine. Candidates who successfully pass each of the required exams have demonstrated competency in each of the core areas of AOM. The candidates are responsible for completing any additional licensing requirements of their state.

Q. (12). Why is the NCCAOM exam more costly than the CALE?

A. (12) The NCCAOM administers a modular examination format, in which four exams (Foundations of Oriental Medicine, Acupuncture with Point Location, Chinese Herbology, and Biomedicine), each containing 100 items (for a total of 400 items), must be passed in order to achieve certification in Oriental Medicine. This format ensures that the candidate has passed each of the required content areas for Oriental Medicine. Computer based administration allows the NCCAOM to administer its exams year-round, which requires a larger number of exam items in the test banks. Candidates can schedule the exams any time after they are deemed eligible, at any of more than 200 Pearson VUE secure test centers throughout the world (see question 2 for additional details about NCCAOM exam administration).
The NCCAOM is continually updating and improving examination content by partnering with experienced subject matter experts (SMEs), exam administration and psychometric vendors. SMEs serve as item writers and additional SMEs serve as Exam Development Committee (EDC) reviewers for each NCCAOM exam. Each EDC SME is trained and then serves as a guest on an EDC and must demonstrate competency in examination item writing and reviewing before he or she can become an EDC member. The NCCAOM makes a major investment in training competent item writers and reviewers. Another cost factor is the growth and maintenance of sizable item “banks.” Computer adaptive testing necessitates having a “bank” of hundreds of items for each exam module. Every item that is used for scoring is statistically validated. Many of the proceeds from NCCAOM examination fees go toward examination development to ensure that each examination is a valid and reliable measure of competency. See the NCCAOM® Examination Study Guides for detailed information on development and administration of the NCCAOM exams. All policies and procedures for the NCCAOM certification programs must be reviewed a minimum of every five years so that these programs can be reaccredited by the NCA.

**Q. (13). What are the benefits of NCCAOM Certification?**

**A. (13)** NCCAOM certification or passing of the NCCAOM exams enables practitioners to apply for licensure in 46 states plus D.C. that require this as a prerequisite for licensure. Many hospitals, employers and insurance companies also require NCCAOM certification as a condition for employment. Federal recognition of acupuncturists is also an important initiative of the AOM profession and the NCCAOM. Through our work with the Dept. of Labor’s Bureau Labor and Statistics (BLS), in which Acupuncturists received their own Standard of Classification in the 2018 BLS Occupational Handbook, and other federal agencies, it was learned that a national exam is an integral part of receiving federal recognition with agencies as the Dept. of Veterans’ Affairs and the Dept. of Defense. The NCCAOM has received numerous calls from practitioners applying for jobs at both federal agencies that require their NCCAOM certification verification as a prerequisite for employment.

**Q. (13). When will the NCCAOM exams be required in California?**

**A. (13)** The CAB voted to recommend to the legislature requiring the NCCAOM exams no earlier than January 1, 2019 (please see July 8, 2016 letter from CAB to the Assembly Business and
Professions Committees); however, as this process is statutory, a bill must be introduced and passed by the CA State Legislature and signed by Governor Brown for it to become effective and the exams required by the state licensure.