



California State Oriental Medical Association

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Dear Dr. Sonia Angell,

Thank you for your leadership during this time. We at CSOMA (California State Oriental Medical Association), a non-profit professional association and advocate for licensed acupuncturists within California, request that you please list Licensed Acupuncturists (L.Ac.'s) as "Essential Critical Infrastructure Workers" because L.Ac.'s provide essential healthcare and are certified in infection control.

- Licensed Acupuncturists are certified in infection control protocols and are following the CDC's "Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease Pandemic."¹
 - The California Acupuncture Board requires L.Ac.'s to have infection control certification in Clean Needle Technique (CNT) with standards set by the Council of Colleges of Acupuncture and Oriental Medicine (CCAOM) including: proper cleanliness, patient safety, infectious control, bloodborne pathogens, non-bloodborne pathogens, handwashing, instrument cleaning, as well as cleaning and disinfecting environmental services in healthcare facilities, and having an exposure control plan, (ECP) to eliminate or minimize employee exposure incidence.²
 - CCAOM added additional COVID-19 acupuncture specific protocols based on the CDC's recommendations that L.Ac. are implementing to protect patients.³ CNT is in addition to over 3000 hours of training at the Master level and over 3400 hours at the Doctorate level.

¹ "Infection Control: Severe acute respiratory syndrome ... - CDC." 15 Jul. 2020, <https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html>. Accessed 20 Jul. 2020.

² "CNT Manual - CCAOM." https://www.ccaom.org/ccaom/CNT_Manual.asp. Accessed 20 Jul. 2020.

³ [0.2020\).pdf](#). Accessed 20 Jul. 2020.

- Licensed Acupuncturists provide “essential healthcare” as CA designated Primary Care Providers serving Medi-Cal, VA, Medicare, and Affordable Care Act patients as acupuncture has “Essential Health Benefit” designation.
 - Licensed Acupuncturists are Primary Care Providers in CA.
 - Acupuncture is a CA Essential Health Benefit.
 - Medicare covers acupuncture treatment for chronic low back pain.⁴
 - Medi-Cal covers acupuncture treatment.
 - Acupuncture is a modality included in the Veteran’s Administration VHA Directive 1137 - Provisions of Complementary and Integrative Health, published in May 2017 to allow acupuncture treatment to be covered by the Veteran’s medical benefits package.⁵
 - Licensed Acupuncturists work in VA Medical Centers (VAMC) and private practice acupuncturists treat VA patients in their private clinics. While VAMC’s are essential medical facilities, L.Ac.’s need to be listed as “essential workforce” to ensure that veterans can continue to receive care if they choose a non-VAMC acupuncture clinic.
- While Licensed Acupuncturists treat patients in designated Essential Medical facilities such as Kaiser, UCSF, and the VA, many L.Ac.’s operate private practices that need the clarity of an “essential workforce” listing.
- Precedent was established in other states with acupuncture in their essential list of health care operations, such as in New York with executive order 202.6.⁶

Licensed Acupuncturists provide necessary care for pain, PTSD, anxiety, and stress relief. Especially now as stress levels are high, we need to continue to fight the opioid epidemic by providing non-pharmacological pain relief to Californians, while following CDC infection control guidelines.

Please list Licensed Acupuncturists as “Essential Critical Infrastructure Workers.”



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⁴ "Acupuncture coverage - Medicare.gov." <https://www.me> "CCAOM Clinic Infection Control Advisory Emergence of" 30 Apr. 2020, [https://www.ccaom.org/images/ccaom/Documents/COVID-19/CCAOM%20Clinic%20Infection%20Control%20Advisory%20\(Updated%204.3dicare.gov/coverage/acupuncture](https://www.ccaom.org/images/ccaom/Documents/COVID-19/CCAOM%20Clinic%20Infection%20Control%20Advisory%20(Updated%204.3dicare.gov/coverage/acupuncture). Accessed 20 Jul. 2020.

⁵ "Acupuncture - Whole Health - Veterans Affairs." <https://www.va.gov/WHOLEHEALTH/professional-resources/Acupuncture.asp>. Accessed 20 Jul. 2020.

⁶ "Guidance on Executive Order 202.6" 29 Jun. 2020, <https://esd.ny.gov/guidance-executive-order-2026>. Accessed 20 Jul. 2020.