

AAOM Response to NOMAA Article in *Acupuncture Today* September 2006

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First, it is important to convey that the following comments are presented in support of the profession. The AAOM believes that the NOMAA application problems at the U.S. Department of Education pose a serious credibility concern for our profession. In addition, our legislative goals would be impeded by a complex environment with more than one accrediting agency.

The *AT* article provides some important information to the profession on NOMAA, but to be more complete, there are many critical USDE findings on NOMAA's petition for initial USDE recognition that speak to the lack of integrity and credibility of NOMAA. To put the magnitude of NOMAA's many deficiencies in its proper perspective, there are less than 60 USDE recognition criteria, and NOMAA was found to violate 46 of those requirements or nearly 80 percent of all the Secretary of Education's criteria for recognition taken collectively.

Ted Priebe's quote gives the reader the false impression that the USDE's findings on NOMAA were minor. To quote Dr. Priebe, the USDE focused only on "Specific...compliance issues with organizational structure, financing, documentation and conflict of interest policies." (*AT* article, www.acupuncturetoday.com/archives2006/sep/09usde.html). This explanation is clearly incomplete when one reviews the full USDE analysis on NOMAA.

An abbreviated list of USDE findings indicate that NOMAA was found to violate:

1. lack of clarity concerning its requested scope of USDE recognition (pp. 11-12 of USDE Staff Analysis);
2. lack of acceptance by the profession, educators and regulators throughout the U.S. (pp. 12-13);
3. apparent conflicts of interest with its accredited institutions (pp. 16-17, 20-21, 24-25);
4. mismanagement of accreditation records (p. 20, pp. 25-26);
5. lack of appropriate criteria for selection of NOMAA commissioners and site visitors (p. 22);
6. serious problems with virtually all its accreditation standards (pp. 26-36, pp. 36-43);
7. failure on the part of NOMAA to follow its own published policies and standards in its review of programs (pp. 37-43);
8. accrediting an OMD program when, according to the USDE report, it was reportedly not operating at the time of the NOMAA site visit review (p. 38-39);
9. failure to adopt and implement appropriate policies regarding the review of its standards and failure to allow input from the profession into NOMAA's standards development process (pp.

49-51);

10. alleged misrepresentations, including assertions of a non-existent admissions test and concerning a college organization (pp. 33-34), and assertions concerning a non-existent "National Oriental Medicine Licensing Exam." (pp. 27-28);

11. failure to make required information public (pp 55-57); and the list goes on.

Another false assertion that has been made by NOMAA officials is that NOMAA will be reviewed by the USDE's National Advisory Committee on Institutional Quality & Integrity (NACIQI) at its December 2006 meeting. The Federal Register Notice for the NACIQI's December 2006 meeting clearly does not list NOMAA on its agenda for that meeting. (See www.ed.gov/legislation/FedRegister/announcements/2006-3/072606d.html).

In view of the manner in which this agency has conducted itself and based on the now official public USDE staff analysis on NOMAA's Petition for Initial Recognition, should NOMAA gain acceptance, it would be an embarrassment to the entire profession and set it back decades in such areas as broader scopes of practice, credible doctor licensing titles, insurance reimbursement, participation in State Worker's Compensation systems, and in the federal Medicare program (Hinchey Bill). The AMA, which has declared war on the CAM professions, including acupuncture, would have real ammunition to attack the profession on these issues, portraying our educational institutions and programs as "Diploma Mills," if NOMAA achieved its goal of gaining recognition and acceptance within the profession and among members of the AOM educational community.