



AMERICAN ASSOCIATION of  
ACUPUNCTURE and ORIENTAL MEDICINE

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February 15, 2008

Secretary Michael O. Leavitt  
The U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

[info@nccam.nih.gov](mailto:info@nccam.nih.gov)  
Via U. S. Mail

Secretary Leavitt:

I am writing you on behalf of the American Association of Acupuncture and Oriental Medicine (AAAOM) which is the national association representing professional acupuncturists in America. There are more than 20,000 fully trained and licensed professional providers of acupuncture and Oriental medicine (AOM) in the United States.

I would like to raise two concerns at this juncture. The first is the National Center for Complementary and Alternative Medicine's (NCCAM) compliance with federal requirements regarding representation of Complementary and Alternative Medicine (CAM) providers on its National Advisory Council, and more specifically, adequate and appropriate representation for acupuncturists. The second is the appointment to the NCCAM of an individual who has published credentials we have been unable to verify.

NCCAM's National Advisory Council is required to have nine members who are licensed in complementary or alternative medicine. There is currently one licensed acupuncturist on the Council (Dr. Ted Kaptchuk), and his term will expire next year. The work of the Council is critical in guiding the research priorities of complementary and alternative medicine in the U.S. As such, the American public deserves to have research advisors who are qualified subject-matter experts presiding over research that can affect the quality of, and access to, acupuncture care. The AAAOM offers its assistance in creating a solution for full compliance by the NCCAM.

Secondly, it has come to my attention that Dr. Lupo Carlota has been appointed to the NCCAM Advisory Council. Dr. Carlota is a physician who markets a 5-day training program to other physicians that he calls "Meridian Regulatory Acupuncture". The AAAOM does not consider short-course trained individuals to be qualified representatives of the profession. Dr. Carlota is not a licensed acupuncturist and, although he lists his credentials as "DiplAc," we have verified that he is not certified by the National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM). This is a misrepresentation of his qualifications. I respectfully request that you reconsider this appointment, given that he does not adequately represent CAM work in the field of acupuncture.

The AAAOM supports the work of the National Advisory Council and NCCAM as we consider acupuncture research to be vital to the American healthcare landscape. Therefore, I am requesting that at least two licensed and nationally certified acupuncturists be appointed to the NCCAM Advisory Council. I would be pleased to send you a list of qualified persons to be considered for appointment.

Sincerely,

Martin Herbkersman, MTOM, DAC  
President, AAAOM