

AN OPEN LETTER

## To the Acupuncture Community

From

**Washington Acupuncture and Eastern Medicine Association (WAEMA)**  
**Seattle Institute of East Asian Medicine (SIEAM)**  
**Bastyr University**  
**Middle Way Acupuncture Institute**

May 2026

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### Dear Colleagues,

On July 4, 2025, the One Big Beautiful Bill Act (OBBBA) was signed into law, resulting in changes to federal student aid programs. Some of these changes went into effect immediately, while others will go into effect in 2026 and beyond. The impact of OBBBA on the acupuncture profession and other health care practitioners is being reviewed and appropriate actions to respond are being discussed. WAEMA has been involved in these discussions on a national, as well as a state level with our schools and other impacted stakeholders.

If you would like more information about the Department of Education's initiatives and the American Society of Acupuncturists (ASA) professional response, please watch the March 18th meeting where it was discussed, hosted by the Acupuncture and Herbal Medicine (AHM) Coalition—a collaboration among the main groups that together provide national infrastructure for our profession.

This letter addresses claims in the white paper *"Preserving Washington's Acupuncture Licensure Pipeline Through State-Level Regulatory Reform,"* prepared by Bex Groebner, DAC, LAc and Debbie Yu, DAOM, LAc, and submitted in March 2026. Although WAEMA shares the authors' concern about the educational pipeline into the profession, the association does not endorse the white paper at this time.

The white paper proposed a rule change to the WA State Administrative Code (WAC) 246-803-240 that would allow Washington State to approve acupuncture licensure exams outside the standard pathway, which runs through the Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM) and the National Certification Board for Acupuncture and Herbal Medicine (NCBAHM, formerly NCCAOM). The authors of the white paper have put a great deal of work and heart into their advocacy efforts, and the pressures they're responding to are real.

Federal loan caps under OBBBA take effect July 1. Multiple programs have closed nationally. Debt loads are unsustainable for many of our students, and 42.6% of

Washington's active practitioners are over 55, which means more acupuncturists will require training to take their place. These are all problems we need to solve.

The Washington schools unanimously support WAEMA; together, Washington's AHM professional association and AHM schools are speaking as one. The question isn't about whether something must change. It's about what to change, when, and at what cost.

### **What's already in motion**

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The story circulating among practitioners is that there's a crisis and nothing is being done. The first half of that perception is true. Thankfully, the second half is not correct. Much is being done at nearly every level.

ACAHM completed its Professional Competencies review in early 2026 and is now running a structured review of minimum program length and hours, with stakeholder input. The agency's review by the National Advisory Committee on Institutional Quality and Integrity (NACIQI) is this summer, with a committee meeting in July and a final decision expected in September. As mentioned, the AHM Coalition—which brings together ACAHM, NCBAHM, ASA, the Council of Colleges of Acupuncture and Herbal Medicine (CCAHM) and the Acupuncture Herbal Vendor Coalition (AHVC)—has submitted coordinated comments to the Department of Education defending AHM programs' access to federal student aid.

### **Where we differ with the white paper**

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The proposed rule would authorize the Washington Department of Health to approve an alternative licensure exam, but currently, no such exam exists. The white paper offers no plan for who would build that exam or how it would be funded. California's state exam took years to develop. Previously, Washington had a state-run acupuncture licensing exam that was problematic. NCBAHM replaced it. That change helped reduce the Washington state budget for licensing and overseeing acupuncturists, helping to decrease licensure fees.

NCBAHM certification is the basis for licensures in 46 states and the District of Columbia. A practitioner licensed in Washington under an alternative path could not practice elsewhere without further testing. Most prospective students will read that as a significant career limitation, and rightly so.

The proposed change also doesn't address the actual aid crisis. Federal student aid (Title IV) eligibility turns on graduate earnings outcomes and federal loan caps. Swapping the licensure exam doesn't move either lever. Not a single Washington student would gain or keep federal aid because of WAC 246-803-240. Finally, a bypass to current ACAHM and NCBAHM standards in Washington would weaken our position in scope-of-practice negotiations elsewhere. Other professions seeking to expand into acupuncture and dry needling would have major obstacles to co-opting the medicine removed.

Many people are talking about what a core acupuncture educational foundation must include. Researchers from across the country have joined to do an urgent wisdom-of-crowds study built on four conditions for reliable collective judgment: diverse perspectives, independent contributions, distributed knowledge, and an aggregation method that doesn't reproduce institutional hierarchy. The output will be a transparent reading of what practitioners and employers consider essential acupuncture competencies, published without institutional advocacy. An article introducing the proposal will be published soon in the *Journal of Integrative and Complementary Medicine*. Outreach regarding the study has gone to ACAHM, NCBAHM, the AHM Coalition, the Society for Acupuncture Research (SAR), Oregon College of Community Acupuncture, the authors of the white paper, and many others. Knowledgeable and diverse people in our field will be invited to contribute from their specific area of expertise.

NCBAHM has confirmed a combination route to the national exam: 1,000 hours of formal training plus two years of apprenticeship under a licensed acupuncturist, with state authorization. Washington would need new legislation to create an acupuncture assistant role, but the exam pathway exists.

In Washington, House Bill 1572 from the current legislative session allows the state to approve a professional program directly if a federally recognized accreditor becomes unavailable. That backstop already exists. Losing accreditation would be a huge setback for the profession, but the provision of HB 1572 gives us room to maneuver if national infrastructure does end up being dismantled.

The schools are doing a great deal of work too. For example, SIEAM launched the Certificate in Asian Medical Bodywork, the first program of its kind approved to lead to Washington massage licensure, so students can earn while they train. Most schools are reducing program hours and cost. WAEMA and advisors are working with allied health professions on standards for the use of acupuncture modalities, so we define that ground rather than cede it.

Oregon and Washington boards are in active conversation about how an interstate compact might work in the future. We want to reduce barriers that currently keep qualified out-of-state practitioners from licensing in Washington. A pre-medical track concept, shared across acupuncture, nursing, and other professions at the community college level, is being explored as a way to reduce student cost without lowering clinical preparation.

## **Where we go from here**

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WAEMA is discussing the potential for a facilitated, in-person work session with the schools, NCBAHM, and ideally ACAHM and other potential stakeholders. The goal is a written agreement on the basics, ahead of any public-facing event.

We want all interested parties at the table. The questions the white paper authors have raised deserve serious engagement, and the work ahead is too consequential to hand to any single faction. Differing perspectives are welcome. As we engage one another going forward, let's keep the conversation at the level of evidence and process. There are not so many of us, and we need to collaborate and cooperate with each other.

### **What you can do**

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Engage with WAEMA today and tell us how you want to be represented by your professional organization. Help inform ACAHM so they can make any changes needed to accreditation. And please, approach proposals such as agency rulemaking, which affect the long-term health of our profession, with the same thoughtful, careful consideration as you approach your own hard-won practice of acupuncture.

We look forward to working with all parties interested in preserving the acupuncture profession as this process evolves.

Thank you.

*With respect,*

**Washington Acupuncture and Eastern Medicine Association (WAEMA)**  
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