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Monday, March 23, 2020

To:  
Governor Tim Walz  
Jan Malcolm Health Commissioner of MN

Re: The role of Acupuncture and Licensed Acupuncturists as auxiliary healthcare workers during public health crisis.

On behalf of the Minnesota Acupuncture Association and our over 300 members of integrative healthcare providers across the state, thank you for your leadership in this time of crisis during the COVID-19 outbreak.

I am reaching out today to discuss the current epidemic as you continue making plans to shelter and keep safe the citizens of Minnesota. In particular I would like to relay some information regarding essential healthcare providers.

Minnesota has long stood as a leader in the nation in terms of healthcare. As such, we have a robust support for integrative medical therapies such as acupuncture across the state. As I'm sure you are aware of, MN is home to over 600 Licensed Acupuncturists providers. These providers work in both private and public health settings.

Our members provide essential services including, but not limited to: pain management, psychological well-being as well as many others. Having highly trained and educated healthcare providers, such as Licensed Acupuncturists allows our acute care settings such as emergency rooms and urgent care facilities to operate at lower capacity. I urge you in your decision making processes moving forward to allow that work to continue as 'essential healthcare' with a mutual understanding that practitioners will follow proper guidelines for safety and prevention.

If a shelter-in-place order does come forward, the MAA is asking that Acupuncture be included in essential healthcare roles.

Furthermore, the MAA contends that as duly licensed healthcare providers by the MN Board of Medical Practice, that Acupuncturists stand ready to assist those acute care settings should the need arise. Acupuncturists are trained practitioners and doctors that could provide much needed support to those facilities that become inundated with increased need.

The services that our members provide have been deemed essential and included in state Medicaid policies by DHS. Acupuncturists are fully licensed to practice, however often our services are relegated to pain management as there is ample evidence to support it. Evaluation and management of a patient's condition is a required part of healthcare according to statutes and an essential part of a provider's skillset to ensure public safety. However, this can often be hindered by payors in the industry. For example, Minnesota's own DHS is not following paying the full scope of services authorized under State Law by limiting services to a select number of diagnosis codes. Senator Jim Abeler has worked to get DHS to provide services according to state law. Payment of evaluation and management codes is vital to managing patients and participating in reporting and communicating with health care providers, clinics and those now dealing with the COVID-19 virus outbreak.

Acupuncture Services in Medicaid Program in MN as taken from MN Acupuncture statute 147b Subd. 3. *Acupuncture practice.*

*"Acupuncture practice" means a **comprehensive system of health care** using Oriental medical theory and its unique methods of diagnosis and treatment. Its treatment techniques include the insertion of acupuncture needles through the skin and the use of other biophysical methods of acupuncture point stimulation, including the use of heat, Oriental massage techniques, electrical stimulation, herbal supplemental therapies, dietary guidelines, breathing techniques, and exercise based on Oriental medical principles.*

The MAA requests that any decisions or decree the Governor's office releases regarding healthcare moving forward includes our members and their ability to practice to their full scope, especially during these challenging times.

Again, I want to thank you for your leadership and for your consideration. If you have any questions or would like to discuss this directly with myself or our association, please reach out to me via phone or email listed at the top of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas Dougherty". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dr. Nicholas Dougherty DAOM, Dipl Ac (NCCAOM), L. Ac  
President, MN Acupuncture Association