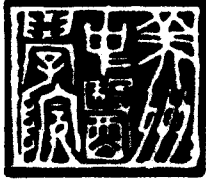


AMERICAN
COLLEGE
OF
TRADITIONAL
CHINESE
MEDICINE



September 1, 2009

California Acupuncture Board
Robert Brewer, Chair
Janelle Wedge, Executive Director
Sent via e-mail

Dear Mr. Brewer, Acupuncture Board Members and Janelle Wedge:

This letter concerns a request that the CAB change the regulation re: Transfer Credits.

We formally request that the CAB remove the current regulation limiting the transfer of 50% of the courses taken at a non-CAB approved college to a CAB approved acupuncture/Asian medicine program. Specifically, we request that the CAB make the following changes to the transfer credit regulation.

Under 1399.435 – g 3-5: Currently, an acupuncture/Asian medicine student may transfer 100% of their credits to a CAB approved school if the college from which they are transferring is another CAB-approved college. If they are not transferring credits from another CAB-approved college, this student may transfer in 100% of the basic sciences, clinical medicine, case management, practice management, public health, professional development from an accredited program, but only 50% of all the other course work and clinical training.

The current wording of 1399.435 – g 3-5 is:

3) Up to 100% transfer credit may be awarded for coursework and clinical instruction completed successfully at another acupuncture school or college which is approved by the board.

4) Up to 100% transfer credit may be awarded for courses completed successfully in basic sciences, clinical medicine, case management, practice management, public health, and professional development at a school which is approved under Article 4 (commencing with Section 9477) of Chapter 7 of Part 59 of the Education Code or by an accrediting agency recognized by the U.S. Department of Education.

5) Up to fifty percent (50%) credit by transfer or challenge exam, for clinical practice coursework and instruction in acupuncture and Oriental Medicine Principles, theories and treatment procedures completed successfully at a school which is not approved by the board may

be awarded by a school approved by the board, provided that at least 50% of the course hours in individuals subjects are completed successfully at a school approved by the board.

We recommend that the CAB remove the 50% restriction and replace 1399.435- g 3-5 with the following wording:

"Transfer credit Policy: Up to 100% transfer credit may be awarded for courses that are successfully completed at a school which is approved by the California Acupuncture Board or by an accrediting agency recognized by the U.S. Department of Education or the foreign equivalent.

In addition, the program must have a written policy regarding the institution's evaluation process for transfer credits and must demonstrate that the transfer credits are equivalent to the program's requirements for graduation from the professional program. In addition, at least one academic year in residence is required for completion of the acupuncture/Asian Medicine professional program and must be taken in the program that is granting the certificate or degree designating successful completion of the professional program."

Thank you so much for considering this request.

Sincerely yours,

Liza Goldblatt, PhD, MPA/HA, ACTCM VPAA
Megan Haungs, MS, LAc, ACTCM MSTCM Dean
Stacy Gomes, EdD, VPAA, Pacific College of Oriental Medicine
Ron Zaidman, MBA, MTCM, President, Five Branches University
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Carol Taub, MAT, LAc, Dean of Academic & Student Affairs and Tim Chapman, PhD, LAc,
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Steve Given, DAOM, LAc, Associate Dean, School of Acupuncture and Oriental Medicine,
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Yun Kim, MA, CEO, Emperors College of Traditional Oriental Medicine