TOWN HALL

AHM Profession Briefing:
Legislative & Regulatory Updates
Insurance Reimbursement

June 24, 2026
8 pm ET | 7 pm CT | 6 pm MT | 5 pm PT

PROFESSION-WIDE EVENT

WWW.AHMCOALITION.ORG

QUICK PARTICIPATION TIPS

- ✓ All Attendees are muted
- ✓ You can ask questions using your dashboard. All questions will be answered during or after the meeting
- ✓ To ensure proper attendance: attendee must be able to see this presentation and the dashboard on their device
- ✓ PDA Certificate of Completion will be distributed within two (2) weeks from the event date

- PDA Points will be reported to Diplomate's Recertification Transcript
- In addition, PDA Certificates of Completion will be uploaded to Diplomate's Portal in the Diplomate Benefits => *My Learning Section*

QUICK PARTICIPATION TIPS

- Attention family and friends! You can watch the presentation together, but each attendee must be logged into the session separately in order to receive PDA points
- ***All Attendees!*** **To receive PDA points, be sure you have registered with your name and NCCAOM ID number as they are recorded in your Certification account. We cannot edit any registration information.**
- The webinar is being recorded and will be posted to the AHM Coalition Website.

	Diplomate Name	NCCAOM ID #
Correct	John Doe	12569
Incorrect	Dr. John Doe	NCC12569
Incorrect	John Doe, L.Ac.	12569FL
Incorrect	John Doe	Doe12569
Incorrect	John Doe, MSOM	12569

THE AHM COALITION

The AHM Coalition is a collaboration of major national acupuncture organizations to advance professional standards of acupuncture and herbal medicine through education, advocacy, and research.

Our mission is to promote the integration of these traditional practices into modern healthcare for the benefit of all.

ACAHM℠

American Society of Acupuncturists

CCAHM

Council of Colleges of Acupuncture and Herbal Medicine

NCBAHM™

AHVC

ACUPUNCTURE HERBAL VENDOR COALITION

AHM COALITION

NCCAOM • ACAHM • ASA • CCAHM • AHVC

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CAE
Executive Director
CCAHM

Legislative Updates

APWA Updates

Advanced Professional Workforce Alliance

- CRA to overturn RISE Final Rule
- Events: June 8th and July 1st
- Legislative Tracker

CCAHM/School Meetings (AHEAD)

- Virtual
- Capitol Hill

COMMITTEE ON EDUCATION & WORKFORCE
CHAIRMAN TIM WALBERG

United States House Committee on Ways & Means
CHAIRMAN JASON SMITH

APPROPRIATIONS
CHAIRMAN TOM COLE

United States Senate Committee on APPROPRIATIONS

U.S. SENATE COMMITTEE ON Health, Education Labor & Pensions

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KEY EDUCATION RULEMAKING COMMITTEES

1 Reimagining and Improving Student Education (RISE) Committee

Focused on program eligibility and degree definitions. AHM licensure programs risk structural exclusion from professional degree classifications — with serious financial aid implications.

- **CCAHM, AHMC, APWA Coalition Comments Submitted**
- **NPRM Public Comment Closed March 2, 2026**
- **Final Rule Published May 1, 2026**

2 Accountability in Higher Education and Access Through Demand Driven Workforce Pell (AHEAD) Committee (PELL)

Focused on Pell Grants (first session) and accountability and earnings metrics (second session). AHM programs face unique vulnerability due to how outcomes data is collected and compared across fields.

- **CCAHM, ACAHM, AHMC Comments Submitted on PELL and STATS Framework**
- **NPRM Public Comment CLOSED April 8, 2026**
- **Final Rule (PELL) Published May 19, 2026**

3 AHEAD Committee Student Tuition and Transparency System and Earnings Accountability (STATS) Framework

- **CCAHM, ACAHM, AHMC Comments Submitted on STATS Framework**
- **NPRM Public Comment CLOSED May 20th**

Final Rule (STATS) Expected by June 30th for implementation July 1, 2026

FEDERAL RULEMAKING (Continued)

4 Accreditation, Innovation, and Modernization (AIM) Committee

"Tasked with developing proposed regulations to reform the higher ed. accreditation system, aimed at reducing costs, increasing innovation, and shifting focus toward data-driven student outcomes rather than bureaucratic compliance."

Neg Reg sessions occurred:

April 13-17, 2026
May 18-21, 2026

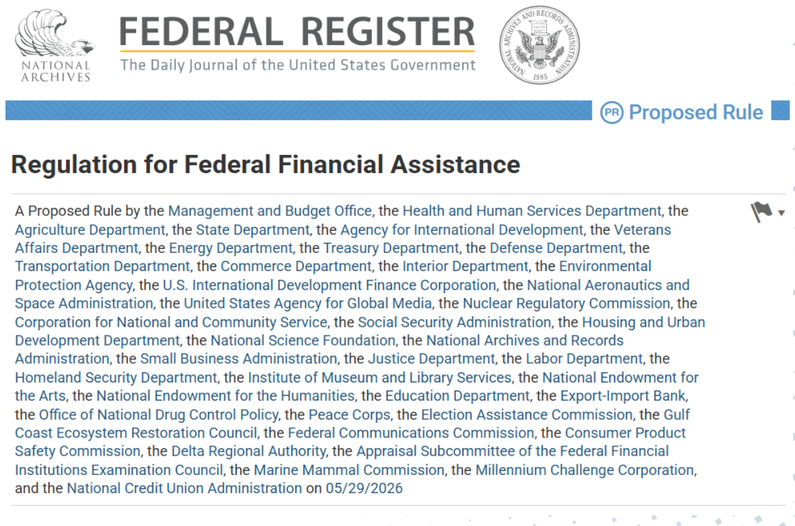
✓ **Committee Consensus Achieved, no NPRM yet.**

Final Rule expected by Nov 2026 for implementation July 1, 2027

Regulation for Financial Assistance

The Office of Management and Budget (OMB) has released a sweeping proposed rulemaking to revise the *Uniform Guidance*, which governs federal grants and cooperative agreements across the federal government. This is a government-wide proposal that would affect grants administered by agencies including HHS, HRSA, NIH, NSF, and many others.

✓ **NPRM Public Comment Deadline: July 13, 2026**

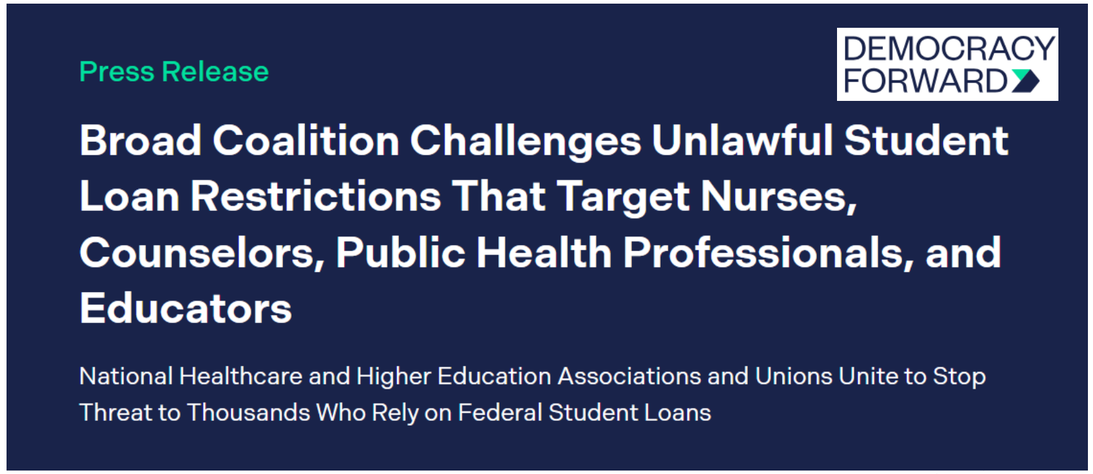

NATIONAL ARCHIVES
FEDERAL REGISTER
The Daily Journal of the United States Government
Proposed Rule

Regulation for Federal Financial Assistance

A Proposed Rule by the Management and Budget Office, the Health and Human Services Department, the Agriculture Department, the State Department, the Agency for International Development, the Veterans Affairs Department, the Energy Department, the Treasury Department, the Defense Department, the Transportation Department, the Commerce Department, the Interior Department, the Environmental Protection Agency, the U.S. International Development Finance Corporation, the National Aeronautics and Space Administration, the United States Agency for Global Media, the Nuclear Regulatory Commission, the Corporation for National and Community Service, the Social Security Administration, the Housing and Urban Development Department, the National Science Foundation, the National Archives and Records Administration, the Small Business Administration, the Justice Department, the Labor Department, the Homeland Security Department, the Institute of Museum and Library Services, the National Endowment for the Arts, the National Endowment for the Humanities, the Education Department, the Export-Import Bank, the Office of National Drug Control Policy, the Peace Corps, the Election Assistance Commission, the Gulf Coast Ecosystem Restoration Council, the Federal Communications Commission, the Consumer Product Safety Commission, the Delta Regional Authority, the Appraisal Subcommittee of the Federal Financial Institutions Examination Council, the Marine Mammal Commission, the Millennium Challenge Corporation, and the National Credit Union Administration on 05/29/2026

LITIGATION OVERVIEW

- Active Lawsuits (RISE)
- Key Issues
- What we're keeping an eye on
- AHEAD Expectations

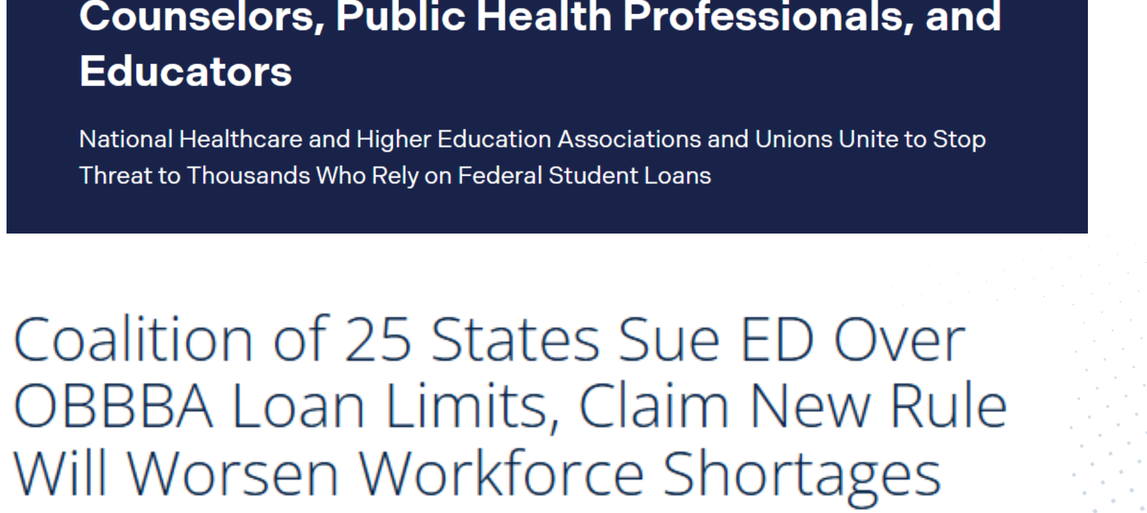


Press Release

DEMOCRACY FORWARD

Broad Coalition Challenges Unlawful Student Loan Restrictions That Target Nurses, Counselors, Public Health Professionals, and Educators

National Healthcare and Higher Education Associations and Unions Unite to Stop Threat to Thousands Who Rely on Federal Student Loans



Coalition of 25 States Sue ED Over OBBBA Loan Limits, Claim New Rule Will Worsen Workforce Shortages

By Maria Carrasco, NASFAA Staff Reporter

Forbes

Nursing Associations Sue Trump Administration Over Student Loan Limit Rule

By Michael T. Nietzel, Senior Contributor. © Michael Nietzel, former college pr... Follow Author

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AHM COALITION RESOURCES

www.AHMCoalition.org

FEATURED EVENT:
AHM Coalition Announces Town Hall on Federal Education Policy and the Future of AHM

Register Now - March 18, 2026
8 pm ET

Event Page | View all News

Latest News

AHM Coalition Provides Public Comment on DOE Propsed Regulations

The AHM Coalition responded to the DOE Negotiated Rulemaking Notice of Public Rulemaking (NPRM) on March 2, 2026 to address proposed rules on student loans limits and profressional degree designations.

Read the Letter

Latest News

Call for Action!
Protect AHM Education
Public Comment due March 2nd

The U.S. Department of Education has issued a proposed rule that could affect federal student loan access for licensure-leading Acupuncture and Herbal Medicine programs. If not addressed, the proposal could significantly reduce loan limits for AHM students and create new barriers to entry into the profession. **Deadline: Monday, March 2!**

Submit Comments Now

Mark McKenzie

Mark McKenzie
LAc, PhD (China), MSOM
Executive Director
ACAHM

Program Revision Proposals

A short survey briefing

An introduction to three draft proposals for revising acupuncture program accreditation standards — to orient you before you complete the stakeholder survey.

Source: ACAHM Program Revision Proposals draft — stakeholder consultation document

ACAHM Accreditation Commission for Acupuncture and Herbal Medicine

American Society of Acupuncturists

Anna Panettiere

Anna Panettiere
DACM, LAc.,
Treasurer,
Acupuncture Society of New York

ASA Insurance Committee

Insurance Trends, Advocacy, and Provider Protection

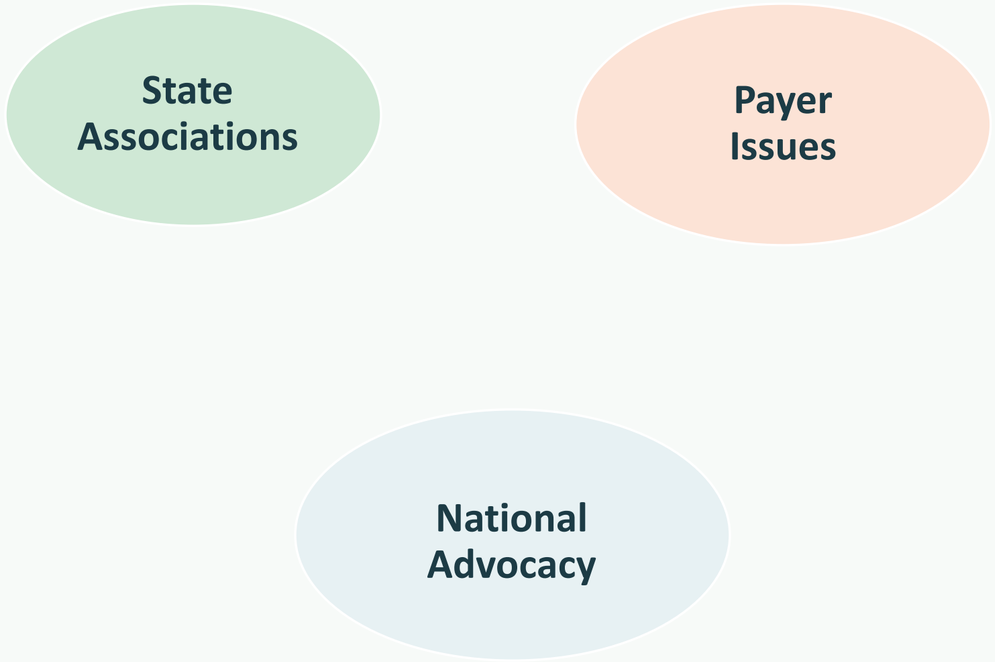
Prepared for state associations and acupuncture providers

Who We Are and Why This Matters

The committee connects payer policy issues, state association concerns, and national advocacy.

- Works with state associations on member insurance issues
- Tracks payer policies that affect access and reimbursement
- Builds response strategies when patterns emerge across carriers or states

- Attend & Monitor All CPT Editorial Meetings and HCPAC meetings as well as monitor RUC meetings for reimbursement decisions affecting acupuncturists.



Goal: protect individual providers while strengthening the profession’s collective voice.

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Ongoing National Engagement

ASA Insurance Committee presence in national coding and professional advisory spaces.

1	**AMA CPT meetings**	3 times per year	Monitoring code language and policy implications
2	**HCPAC meetings**	Bi-monthly	Maintaining visibility in health care professional advisory discussions
3	**State association support**	Ongoing	Helping identify patterns and organize responses

National engagement helps the committee anticipate issues before they become widespread provider problems.

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Active Insurance Issues

Current examples the committee is monitoring and responding to.

Aetna reimbursement error

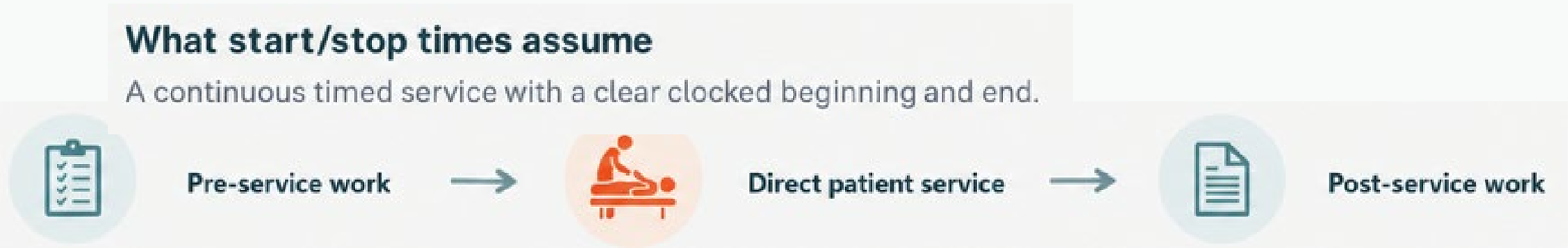
Medicare Advantage PPO ESA plans and recoupment concerns

E/M same-day limitations

Carrier policies that restrict E/M with acupuncture on the same date

Start/stop time demands

Carrier requests forcing documentation beyond typical clinical requirements



What the committee looks for

- Repeated pattern
- Carrier policy language
- Provider impact
- Appeal or advocacy pathway

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Reimbursement Issues & Trade Association Role

Advocacy must be strong, coordinated, and legally appropriate.

Current concerns

- Low fee schedules
- Inconsistent payment policies
- Payer limitations
- Patient access issues

What associations can do

- Collect trend data
- Educate members
- Respond to unfair or unclear policies
- Communicate with payers and regulators

What associations must avoid

- Coordinating provider fees
- Encouraging collective refusals
- Sharing competitively sensitive pricing

Advocacy is strongest when it is issue-based, evidence-based, and focused on fair process and patient access.

Audits, Recoupments, Denials, and Reviews

The current audit environment is more active and more documentation-driven.

Common patterns

- Post-payment reviews
- Pre-payment reviews
- Medical necessity denials
- Refund demands and recoupments

Why it is increasing

- Data analytics identify patterns
- Higher payer scrutiny of utilization
- Documentation gaps create easy targets

The same records that support payment also become the evidence in a refund demand, appeal, or regulatory complaint.

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Documentation as Protection and Advocacy

Strong documentation protects the provider and strengthens the profession’s policy arguments.

Appeals

Successful appeals need facts, not frustration.

Audit Defense

Records must explain why care was reasonable and necessary.

Clinical Value

Outcomes and function show why acupuncture matters.

Advocacy

Consistent records help associations prove payer impact.

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Common Coding Issues

Coding reminders that require clear medical-necessity documentation.

CODE	SERVICE	COMMON ISSUE	WHAT DOCUMENTATION MUST SHOW
E/M	**Evaluation / Management**	**Do not rely on time alone.**	Must include history, exam findings, assessment and treatment plan. Time may support the level, but the note must prove the E/M work was medically necessary.
97016	**Vasopneumatic devices**	**Do not use for most insurance.**	Generally not appropriate for routine billing. VA CCN may use this code for cupping when payer-specific rules allow and documentation supports the service.
97140	**Manual therapy**	**Do not use as a massage code.**	Document what was done, where it was done, why it was performed, clinical rationale, and time. Do not document only minutes.
97110	**Therapeutic exercise**	**Teaching strength/endurance exercise.**	Include what exercise was taught, why it was medically necessary, patient response, and time. This code should not automatically be billed at every visit.
97810–97814	**Acupuncture codes**	**Time is one-on-one / face-to-face.**	Time must be accurate and documented as face-to-face or one-on-one. Do not default to “15 minutes” unless that is the actual time provided.

Accurate time + medical necessity + clear details → stronger claims and stronger appeals

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Next Steps for Providers and Associations

Practical actions turn isolated payer problems into usable advocacy data.

1. **Improve documentation habits**

   Document medical necessity, outcomes, response, and plan clearly.

2. **Identify payer trends**

   Track denials, refund requests, requests for records, and policy changes.

3. **Report concerns**

   Share patterns with state associations and ASA Insurance Committee.

4. **Coordinate responses**

   Use shared information to support payer, regulator, and policy advocacy.

Shared information → stronger appeals → stronger advocacy → better access

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Questions & Discussion

What patterns are you seeing in your state or payer market?

Bring forward:

- Denial language
- Payer policy citations
- Record request templates
- Refund or recoupment letters
- State-specific access concerns

ASA Insurance Committee

Monitoring • Responding • Advocating

insurance@asa.org

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THANK YOU!

Please stay engaged!

PDA Certificates of Completion and PDA Points will be distributed within two (2) weeks of this event date.

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