



TOWN HALL

Monthly Briefing: Policy Updates and Coordinated Response

April 29, 2026

8 pm ET | 7 pm CT | 6 pm MT | 5 pm PT

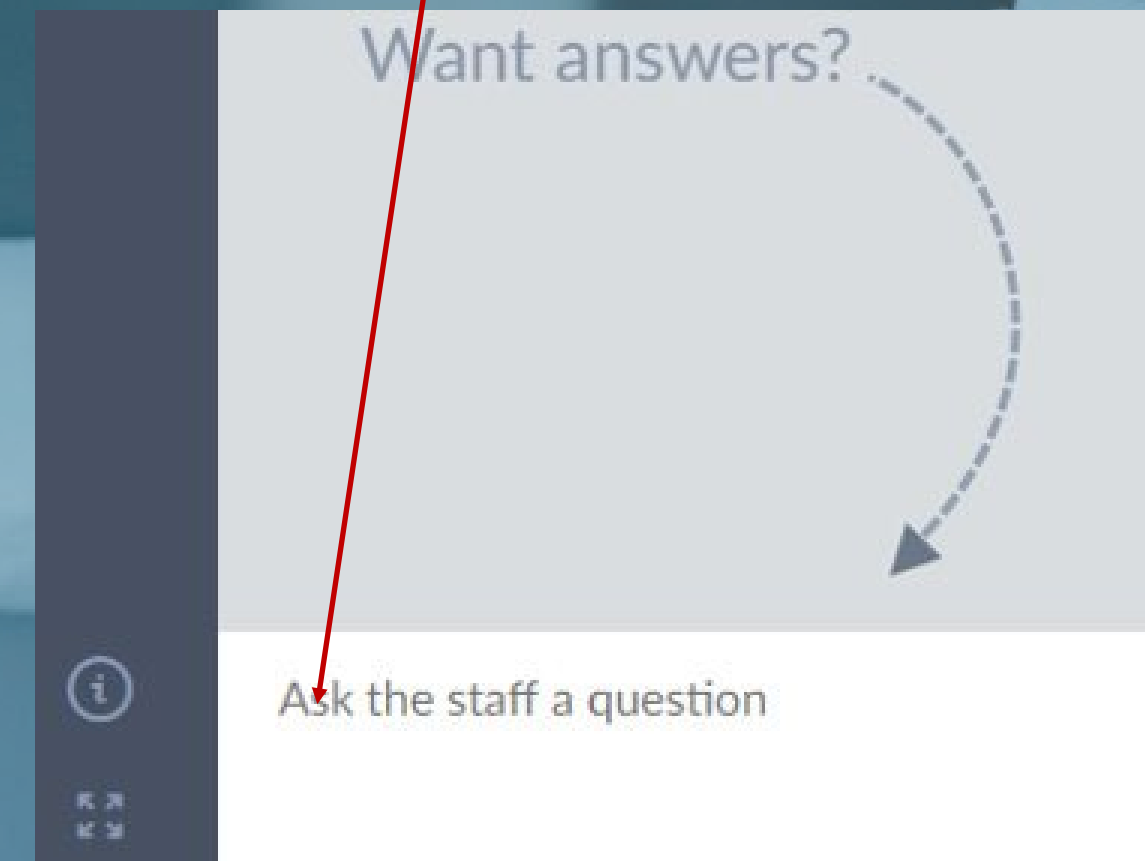
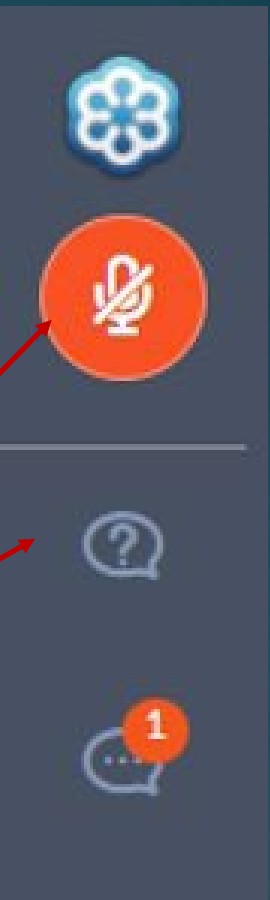
PROFESSION-WIDE EVENT

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 Certification 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 Town Hall 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

PRESENTERS



Mark McKenzie
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Executive Director
ACAHM



Thomas Kouo
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President
CCAHM



Paul Magee
Ma.O.M., L.Ac.
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Greg Pepping
CEO, Kan Herb Company
Co-Vice Chair
AHVC



Kristin Richeimer
CAE
Executive Director
CCAHM



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.



Council of Colleges of
Acupuncture and Herbal Medicine



AGENDA



- **Overview**
- **Acupuncture Herbal Vendors Coalition (AHVC)**
- **Current Status (Regulatory & Legislative)**
- **Q&A from March 19 Town Hall**
- **Next Steps**



Stats from March 19th Town Hall

- 1462 Attendees
- 843 (95%) of 887 Respondents indicated that they were L.Ac.'s
- 356 (39.8%) of 895 Respondents indicated that they were dues paying members of their respective state association.
- **539 (60.2%) of 895** Respondents indicated that they were not members of their respective state association.
- We received over 65 questions/comments after the 3/18 webinar and have posted responses in the resource



Update to USDE Federal Regulation processes

- **RISE - Reimagining and Improving Student Education**
 - **LOAN Caps**
 - Pending Final Rule expected anytime. Rule effective 7/1/26
- **AHEAD - Accountability in Higher Education and Access through Demand-driven Workforce Pell.**
 - **EARNINGS Metric**
 - NPRM published 4/20, Comments due 5/20
- **AIM - Accreditation, Innovation, and Modernization.**
 - 1 of 2 sessions of Negotiated Rulemaking Completed
 - Next session 5/18-22



Approaches for the AHM Coalition/Profession

- Participation in the Advanced Professional Workforce Alliance (APWA) a national coalition of healthcare, education, and professional organizations dedicated to protecting federal student aid access and strengthening the specialized workforce.
 - **ONGOING (ACAHM/CCAHM)**
- In depth review of AHEAD NPRM and its impact on the acupuncture profession
 - **ONGOING (ACAHM/CCAHM)**
- Analysis of Department's Earnings Data related to acupuncture programs
- Submission of formal comments to AHEAD NPRM no later than May 20, 2026
- 501 c 6 organization development of talking points and literature for grassroots lobbying and legislative efforts to address these issues.
 - **ASA, CCAHM, NCBAHM**



What are the AHM Coalition members doing?

ACAHM created a *Title IV and Regulatory Readiness Survey* to:

- assist the Commission in defining the scope and nature of assistance it may be able to provide;
- to help clarify the readiness of accredited programs and institutions for facing impending changes;
- and to maximize its ability to engage with Federal and state decision makers.



ACAHM is currently researching the following

- Reducing the minimum clock hour requirements in some content areas in the MAc program.
- Creating a new entry-level acupuncture program at the bachelor's level that would be eligible for standard acupuncture licensure in many states.
- Creating a 3-year “applied bachelor’s” program concentrated on specific content and competencies that is followed by a master’s program for licensure eligibility. The master’s would be considerably shorter and more affordable than the current MAc.
- Stackable add-on programs, such as herbal medicine training, practicing in systems-based settings, clinical specialty areas, etc.
- Encouraging off-campus clinical training in appropriately qualified private practices, conventional health centers, and multi-disciplinary clinics which may lower program operating costs.



ACAHM Program Requirements

In recognition of stakeholder concerns regarding the cost of education and potential changes to federal financial aid availability, the Commission is currently evaluating its program admissions requirements (see *criterion 5.02*) and its minimum program length requirements (see *criterion 7.02*). The Commission welcomes constructive suggestions for specific edits to the relevant criteria and will provide all stakeholders, including institutions, students, and the public opportunities to review proposed revisions and provide feedback. Suggested edits should be sent to comments@acahm.org



Tax-deductible charitable contributions



ACAHM is considering broadening its mission-aligned activities to include the acceptance of tax-deductible charitable contributions, consistent with its Articles of Incorporation and Bylaws, for the benefit of the acupuncture and herbal medicine profession during these very trying times. Historically, the Acupuncture and Herbal Medicine (AHM) profession has not had a clear charitable mechanism through which funds could be solicited to support broad educational efforts for the benefit of the field, including efforts to educate the public and respond to major developments affecting institutions, students, and the future workforce. This expansion is not intended to enhance ACAHM's bottom line. Its purpose is to support the profession through targeted, mission-aligned educational initiatives during an extremely challenging period for the AHM profession....Stay tuned



Your Industry Partners!

Acupuncture Herbal Vendor Coalition



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



Legislative Outreach Guidance - COMING SOON

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

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 Comments Submitted During Committee



Workforce Pell NPRM Public Comment CLOSED (Comments Submitted)



Accountability & Earnings NPRM – CCAHM will release templates by May 14th!

3 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 scheduled: April 13-17, 2026.



Responses to 1st AHEAD NPRM – April 8



Build the Rulemaking Record & Credibility

Protect Existing Pell Eligibility

Workforce Pell Definitions Carry Forward



April 8, 2026

Nicholas Kent, Under Secretary
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Comments of the Council of Colleges of Acupuncture and Herbal Medicine on the Notice of Proposed Rulemaking — Accountability in Higher Education and Access through Demand (AHEAD) and Workforce Pell Grant Provisions; Docket ID ED-2026-OPE-0133

Dear Under Secretary Kent:

The Council of Colleges of Acupuncture and Herbal Medicine (CCAHM) respectfully submits these comments on the above-captioned Notice of Proposed Rulemaking (NPRM). CCAHM is the national organization representing accredited member institutions that provide graduate-level education and training in Acupuncture and Herbal Medicine (AHM). Accredited AHM schools collectively educate the majority of licensed acupuncturists and herbal medicine practitioners in the United States, operating programs accredited by the Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM), an agency recognized by the U.S. Department of Education.

The graduates of accredited AHM institutions, including nearly 30,000 licensed Acupuncturists nationwide, provide essential healthcare services addressing (among many other health concerns) pain management, mental health, and chronic disease, directly supporting Veterans, the VA and the "Make America Healthy Again (MAHA)" agenda, including in underserved communities.

CCAHM has been an active participant in the federal rulemaking processes that gave rise to this NPRM, including formal public comments submitted in connection with the RISE Committee and the March 2, 2026 AHEAD comment period. We write now to address the specific provisions of the Workforce Pell and related accountability rules, and to ensure that the final regulations accurately reflect the nature and circumstances of AHM education.

We appreciate the Department's commitment to expanding access to Pell Grants and improving accountability for student outcomes. We support these objectives and believe they can be achieved in a manner that does not inadvertently harm students enrolled in rigorous, licensure-leading professional programs. We offer the following substantive comments toward that end.

I. CCAHM's Institutional Perspective and Role in This Rulemaking

CCAHM member institutions operate accredited master's and doctoral programs that are clinically intensive, licensure-leading, and require multiple years of didactic and supervised patient care education. These are not short-term or workforce training programs; they are graduate

www.CCAHM.org

CCAHM Letter



8 April 2026

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Docket ID ED-2026-OPE-0133 – Accountability in Higher Education and Access through Demand (AHEAD) and Workforce Pell

Dear Under Secretary Kent:

On behalf of the Acupuncture and Herbal Medicine Coalition ("AHM Coalition"), we appreciate the opportunity to submit comments on the Notice of Proposed Rulemaking (NPRM) regarding Accountability in Higher Education and Access through Demand (AHEAD) and the implementation of Workforce Pell and related Pell Grant provisions. The AHM Coalition represents national organizations across the education and professional practice of Acupuncture and Herbal Medicine ("AHM"). Collectively, our member institutions represent, educate, accredit, certify and support graduate-level students who become licensed healthcare professionals serving patients in hospitals, oncology clinics, Veterans Health Administration facilities, community clinics, and private practices nationwide.

The graduates of accredited AHM institutions, including nearly 30,000 licensed Acupuncturists nationwide, provide essential healthcare services addressing (among many other health concerns) pain management, mental health, and chronic disease, directly supporting Veterans, the VA and the "Make America Healthy Again (MAHA)" agenda, including in underserved communities

The Coalition represents institutions, programs, accreditors, and professional organizations engaged in the education and training of licensed acupuncturists and herbal medicine practitioners across the United States. We support the Department's goals of expanding access through Pell and strengthening accountability, and we offer the following comments to ensure that the final regulations equitably reflect the realities of acupuncture and herbal medicine (AHM) education.

I. General comments on scope and interaction of AHEAD and Pell provisions

The NPRM implements Workforce Pell while also embedding new accountability expectations, including earnings metrics and expanded program-level reporting. For small, specialized health professions such as AHM, it is critical that short-term Workforce Pell rules, long-standing Pell eligibility, and new accountability metrics operate together in a way that does not unintentionally restrict access for students in licensure-leading programs.

We respectfully urge the Department, in the final rule and preamble, to:

- Clarify that creation of Workforce Pell eligibility for short-term programs does not call into question existing Pell eligibility for longer-term, licensure-leading health professions programs, including

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AHMC Letter



AHEAD COMMITTEE NPRM

KEY POINTS – DEADLINE MAY 20th!



- Substantive & Customized!
- Support for Accountability & Transparency
- 4- year Timeline Challenges for AHM Graduates
- Delay due to Master Calendar, other Legal Considerations
- Impacts on Equity & Access to Aid



**PUBLIC
COMMENT
OPPORTUNITY:
INFO PENDING**

DOE NEGOTIATED RULEMAKING
UPDATE

MOBILIZING FOR ACTION



Who should act?

- Institutions/Faculty
- Licensed Practitioners
- State Associations/Acupuncture Associations
- Patients/Community Support

What to do?

- Stay Informed | Join AHM Coalition Monthly Calls!
- Legislative Outreach
- Coordinated Public Comment (between May 14-20)



Four Voices, One Movement — Part 1: Institutions & Practitioners

INSTITUTIONS & FACULTY

- Argue why the rule is legally and methodologically wrong
- Challenge earnings metric design, cohort construction, data gaps
- Cite Title IV law, APA requirements, accreditation standards
- Request specific regulatory language changes

LICENSED PRACTITIONERS

- Describe who is harmed with real, personal stories about your practice and your patients
- Show the earnings metric is flawed from lived experience: you sat for boards, built your practice; etc.
- Connect the 4-year earnings snapshot to the reality of building a self-employed clinical practice
- Describe the patients & communities you serve, especially if they are rural, underserved, lower cost services for highest need.



Four Voices, One Movement — Part 2: Students & Patients

CURRENT & PROSPECTIVE STUDENTS

- Show what's personally at stake if programs could lose Direct Loan eligibility based on flawed data
- STATS disclosures using incomplete earnings data could deter future students and shrink the profession
- Warning triggered by bad metrics stigmatize high-quality programs unfairly
- Credibility comes from being the generation whose future depends on getting this rule right

PATIENTS & COMMUNITY SUPPORTERS

- Share your story how acupuncture has changed your health; regulators need to hear what wages can't measure.
- If AHM programs close, your community loses future practitioners even if it doesn't happen right away. Name the care that disappears.
- The metric penalizes access to education and care in rural, underserved communities — exactly where patients need it most.
- Federal accountability policy should measure what actually matters to patients: licensure, clinical competency, and access to care, not only early-career wages.



NEXT STEPS



Coordination is Key

Messaging is Critical

AHM + Other Impacted Professions

**AHEAD Committee NPRM Responses
Public Comment Open NOW**

Templates to be released by May 14th!

We need everyone to coordinate on responses to public comment once it opens. Templates will be available on the AHM Coalition and CCAHM website.

**RISE & AHEAD Committee Legislative
Outreach (May/June - Ongoing)**

Coordinated strategy, templates and talking points coming soon after NPRM.



Legislative Tracker (RISE - Student Loans)

Bill	Sponsor	Description
H.R. 6718	Rep. Lawler (R-NY)	Professional Student Degree Act — expands statutory definition of professional degree to include AHM and allied health fields
H.R. 6574	Rep. Kennedy (D-NY)	Loan Equity for Advanced Professionals (LEAP) Act — sets uniform \$50K annual borrowing limit for graduate and professional students
H.R. 6739	Rep. Dingell (D-MI)	Clarity in Professional Degree Act — explicitly adds nursing, OT, PT, social work, public health, and related fields to professional degree definition
H.R. 6677	Rep. Torres (D-NY)	Professional Degree Access Restoration Act — fully reverses OBBBA graduate and professional loan restrictions
H.R. 6862	Rep. Harder (D-CA)	Protecting Health Care Workforce Pipelines Act — delays new loan limits until 2030 for health professions schools near shortage areas

Branch	Committee
House	Education & Workforce
House	Appropriations
Senate	Health, Education, Labor & Pensions (HELP)
Senate	Appropriations





Advanced Professional Workforce Alliance



Q&A from March 19th Town Hall



Thomas Kouo
DAOM, L.Ac., Dipl.OM
President
CCAHM



Paul Magee
Ma.O.M., L.Ac.
Chair
ASA



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 Proposed 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 loan limits and professional 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](#)





THANK YOU!

Please stay engaged!

***Don't forget to claim your
NCBAHM PDA Points!***

WWW.AHMCOALITION.ORG

