

N M S A A M
New Mexico Society for Acupuncture and Asian Medicine

TO

New Mexico Board of Acupuncture and Oriental Medicine
P.O. Box 25101
Santa Fe, NM 87504

N O V E M B E R 1 3 , 2 0 2 5

Dear Honorable Members of the Board,

It is the opinion of the New Mexico Society for Acupuncture and Asian Medicine (NMSAAM) that the New Mexico Board of Acupuncture and Oriental Medicine (BAOM) lacks the statutory authority for the proposed changes to NMAC 16.2.16.

NMSA 1978 § 61-14A-4.1 subsection (F) reads (emphasis added):

A certified auricular detoxification specialist **shall** practice under the supervision of a licensed doctor of oriental medicine registered with the board as an auricular detoxification specialist supervisor. A supervising doctor of oriental medicine **shall** be accessible for consultation directly or by telephone to a practicing auricular detoxification specialist. The supervising doctor of oriental medicine shall not supervise more specialists than permitted by board rule. Supervision requirements shall be provided by rule of the board.

The proposed changes to NMAC 16.2.16 effectively remove the supervision requirement for Certified Auricular Detoxification Specialists (CADS) that have been certified for more than 5 years.

The proposed changes remove the requirement to list a supervisor for CADS certified more than 5 years. Further the proposed changes remove the requirement for site visits and for the supervisor to be available during treatment times. This is effectively removal of the supervision requirement established in the statute and is outside the authority of the BAOM.

The NMSAAM strongly urges the BAOM to reject these proposed changes as outside their statutory authority.

Approved by the NMSAAM Board of Directors
13 November, 2025

New Mexico Society for Acupuncture and
Asian Medicine

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