

Traditional Medicine Clinical Practice Manual

Galina V. Roofener

Copyright ©2021 by Galina V. Roofener. All rights reserved.

No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying, recording, or otherwise, without the authors' prior written permission.

Title: Traditional Medicine Clinical Practice Manual.

Author: Galina V. Roofener

Publisher: Asian Therapies Academy

ISBN: 978-1-329-57296-6

Disclaimer

All information presented in this book is for educational purposes only and is not intended to substitute professional biller, tax professional, or attorney advice. Healthcare laws, rules, and regulations are complex and highly regulated. They change frequently, and because these changes can be significant, you should always check with appropriate professionals to stay fully abreast of the current laws, rules, and regulations that impact the delivery of healthcare services.

The author has no intentions to promote a specific product or company reflected in this book. Neither the authors, editors, nor contributors to this text assume any liability for injury or damage to persons or property from the use or operation of any methods, products, instructions, or concepts referred to or contained within this publication.

Any data reflected in the book is purely imaginary and does not reflect actual patients. Any recommendations are not intended to be used as a substitute for the independent judgment of the acupuncturist. Adherence to the best practices will not ensure a successful outcome for every patient. There are other acceptable methods of evaluation and treatment aimed at the same result. The acupuncturist must decide to utilize a particular assessment, clinical procedure, or treatment plan in light of the clinical data presented by the patient, the diagnostic and treatment options available, and the patient's preferences and values.

The Guidance: Best TCHM Compounding and Dispensing Practices document is included in this book with permission from Bill Egloff, AHPA Chair Emeritus of the Chinese Herb Committee.

Acknowledgments

To everyone who has inspired my dreams and supported my spirit throughout my journey, I thank you.

To my mom, Vera Veresciak, I extend my highest respect and enormous gratitude for teaching me ways of thinking and taking responsibility for myself and my actions.

To my ‘better half’ Brian Terry, I am grateful for your encouragement and endless patience as I created this book.

I sincerely thank Laurie Shaffer Holton, a professional biller from Sharrer Billing, for her consultations on billing specifics for acupuncturists.

I am immensely grateful to Bill Egloff from Crane Herb Pharmacy, AHPA Chair Emeritus of the Chinese Herb Committee, and Theresa Williams from Treasure of the East for their consultations on Traditional Chinese Herbal Medicine (TCHM) quality and custom compounding standards.

I deeply appreciate Brandon Hoffman from the Acupuncture Council for his guidance on properly handling the legal remediation of adverse events.

I want to acknowledge David Bibbey LAc, from Patient Data Protection, for his business expertise and for coaching me on HIPPA, ADA, and cybersecurity.

Dear Marilyn Allen, this book would never have happened without your input on advancing Traditional Medicine in the United States, without my privilege of learning from you. I cannot underestimate the opportunity to teach practice standards to multiple classes of acupuncture students. Thank you from the bottom of my heart.

To all my patients and colleagues, thank you for providing me with the continuous learning opportunities that made this book possible.

Dear readers, please forgive me if you notice any grammatical errors or inconsistencies. This book was edited using Grammarly AI software, which played a crucial role in translating and refining my “Ruglish” into English; however, some linguistic imperfections may still remain.

Galina V. Roofener

History of This Book

The idea of writing this book first came to me in 2018, when I worked as an acupuncturist and traditional Chinese herbalist at the Cleveland Clinic's Integrative Medicine and Lifestyle Department.

The first time the need for the standardization of traditional medicine records came from my experience in comprehending patients' chart notes, which were seen by seven different acupuncturists. You may ask, how did it happen that so many acupuncturists were taking care of a single patient? Booking to the first available time slot is common in multi-provider practices. Rotating patients among many providers is not problematic in the standardized environment of conventional medicine but poses an extreme challenge to ensure the continuity of care in traditional medicine. To complicate the issue, all acupuncturists in our department were educated in different countries and practiced different acupuncture styles. Accordingly, it wasn't easy to understand what previous acupuncturists did and, most importantly, why. This was when the need for a standardized assessment section of the notes became apparent. Notes should reflect the process of the provider's thoughts specific to their respective acupuncture style and the use of standardized pattern differentiation terminology to ensure proper continuation of care.

The second time, the need for modernization and standardization of Traditional Medicine practice guidelines stood out to me when I was developing the Traditional Chinese Herbal Medicine (TCHM) program at the Cleveland Clinic. Among many questions, the most challenging were:

- How do you accredit herbalists in the hospital?
- What are the referral guidelines for the TCHM clinic?
- How do we make the logistics of practice in multiple locations profitable?
- How do you navigate custom TCHM formulae compounding and dispensing without encroaching on the pharmacist's scope of practice?
- How to monitor TCHM safety?

Administrators, directors, and providers working in many major Western Medicine Healthcare Systems were unfamiliar with all these TCHM practice questions.

The third challenge I faced in 2015 when the Cleveland Clinic administration asked me to conduct TCHM encounters via telehealth. The biggest challenge was complying with the practice standards, such as remotely collecting objective pulse palpation signs and tongue observation. It took me four years to overcome that obstacle.

The fourth time I faced the challenge of proper documentation was when the state of Ohio included acupuncture as a Medicaid-reimbursable service, and we started seeing many of those patients. This triggered an internal audit that was extremely stressful but very educational. Communicating with the internal auditor taught me how to properly support diagnoses in the notes and how professional diagnosis coding works.

The fifth and final call was when the Veterans Health Administration (VHA) audit was published. It showed that 76% of community acupuncturists audited could not support their claims. Accordingly, those providers may face significant penalties under the False Claims Act or even legal implications. However, for any of us inside the profession, it is apparent that most documentation issues stem from a lack of information and are not from malicious intent.

Colleges prepare us well to attend to patients, but there is much to know besides direct patient care. The style of practice we learn in colleges is designed for the solo practice of past centuries, but times have changed. Accordingly, the profession must adapt and modernize how we practice in the United States of the 21st century in order to survive and prosper. I hope this book will answer many missing questions and help the profession thrive.

Galina V. Roofener

Table of Content

Chapter 1 – Profession Standards

Learning Outcomes	21
1. Traditional Medicine Worldwide Strategic Vision	25
2. Traditional Chinese Medicine Education Standards	25
2.1. Traditional Medicine Education Standards Setting Agencies	26
2.2. Education Competencies	26
3. Provision for Acupuncturist Practice in the United States	27
3.1. National Board Certification	27
3.2. State License	28
3.3. Professional Organizations	30
3.3.1. State Acupuncture Associations	30
3.3.2. National Acupuncture Association	31
3.3.3. Other National & International Associations	32
3.4. Credentialing	32
3.5. Privileging	34
4. Hospital/ Integrative Practice – Expectations, Rights, and Responsibilities	36
5. Private Practice – Expectations, Rights and Responsibilities	41
5.1. Primary Care - Definitions, Rights and Responsibilities	41
5.2. Diagnosing Provider	43
6. Professional Ethics	44
6.1. Conventional Medicine Ethics	44
6.1.1. Ancient Hippocratic Oath	44
6.1.2. The Physician's Pledge	45
6.2. Traditional Chinese Medicine Ethics	45
6.2.1. The Healer's Oath of Sun Simiao	45
6.2.2. Modern US Acupuncturist Ethics	46
6.3. NCCAOM Discipline Grounds	46
6.4. Standards for Acupuncturists' Practice	47
7. Position of Acupuncturist Profession in the US Healthcare System	48
7.1. The Acupuncturist Profession History in the US	48
7.2. Bureau of Labor and Statistics (BLS) - Acupuncturists Profession Description	50
7.2.1. Education	50
7.2.2. Experience Requirements & Job Zone	50
7.2.3. National Certifications	50
7.2.4. Work Tasks	50
7.2.5. Work Activities	51
7.2.6. Detailed Work Activities	52
7.2.7. Skills Necessary	53
7.2.8. Knowledge Required	53
7.2.9. Work Ethics Required	54
7.2.10. Work Context	54
7.3. Acupuncturist Employment and Wages	55
7.3.1. NCCAOM Job Survey Statistics	55
7.3.2. Bureau of Labor & Statistics - Acupuncturists Employment & Wages	56
7.3.3. Bureau of Labor and Statistics (BLS) Comparison of Wages Between Specialties	60
7.3.4. Comparison of the Projected Employment Growth Years 2023-2033	61
7.3.5. Challenges with Wage Estimates for Acupuncturists Engaged in Private Practice	61
8. Bibliography	61

Chapter 2 – Care Standards

Learning Outcomes	65
1. Standards of Care in Traditional Medicine	65
1.1. Standard of Care Determination Resources	66
1.2. Acupuncturist/Traditional Medicine Practitioner Standards of Care	67
2. Clinical Practice Guidelines in Traditional Medicine	68
3. Care Pathways	68
3.1. Clinical Care	68
3.1.1. Level of Care	69
3.1.2. Factors Affecting Care Pathways	69
3.2. Maximum Therapeutic Benefit	69
3.3. Maintenance Care	69
3.4. Supportive Care	70
3.5. Palliative Care	70
3.6. Medically Necessary Care	70
3.7. Letter of Medical Necessity	73
4. Traditional Medicine Clinical Care Practice Standards	75
4.1. Initial Evaluation and Management	75
4.2. Re-Evaluation	77
4.3. Acupuncture Procedure	80
4.4. Coordination of Care and Referral	82
4.5. Patient Education	82
5. Guidelines for Medical Record Documentation	82
5.1. Commonly Accepted Standards for Medical Record Documentation	82
5.2. Accuracy of Data on Healthcare Claims	83
5.3. Record Retention	84
5.4. Legal Consideration of Documentation	84
5.5. Other Purposes of Documentation	84
6. Negligence	85
7. Healthcare Provider Duties to the Patient.....	85
8. Patient Rights and Responsibilities	86
8.1. Patient Bill of Rights	86
8.2. Patient Responsibilities	88
8.3. Patient Rights in the Clinical Records	88
9. Appendix: Record Retention by State	88
10. Bibliography	91

Chapter 3 – Billing Standards

Learning Outcomes	93
1. Fundamentals of Medical Coding and Billing	94
1.1. Medical Coding and Billing Definitions	94
1.2. The Benefits of Medical Coding.....	94
1.3. Compliance with Medical Billing and Coding Rules	95
1.4. Billing & Coding Challenges	96
2. Medical Coding Basics	96
2.1. ICD Codes	97
2.2. CPT Codes	98
2.3. HCPCS Codes	98
2.4. Modifiers	99
2.5. ICF codes	99
2.6. DRG Codes	100
3. ICD-10 Coding in the Practice of Acupuncture	100
4. Most Commonly Used CPT Codes in the Practice of Acupuncture	101
4.1. Evaluation and Management (E/M) Services CPT Codes	101

4.1.1.	E/M Services Billing Legalities	101
4.1.2.	E/M Services CPT Codes Description	103
4.1.3.	E/M Code Selection Guidelines	104
4.1.4.	E/M Coding in Acupuncture Clinical Practice	111
4.2.	Acupuncture Codes	113
4.2.1.	Maximum Units of Acupuncture CPTs per Encounter Utilization Guidelines	114
4.2.2.	Relative Value Units (RVU)	115
4.2.3.	Acupuncture CPT Description	115
4.2.4.	Acupuncture CPT Coding Rules in Clinical Practice	116
4.3.	Physical Therapy and Other CPT Codes	117
4.4.	Modifiers Used in Acupuncture Practice	118
4.5.	Diagnosis Pointer	119
4.6.	Coding Summary	119
4.6.1.	Coding Determination Principles	119
4.6.2.	Inaccurate Coding	121
5.	Coding and Billing No-Show & Left-Without-Being-Seeing	121
6.	Billing Basics	123
6.1.	Medical Office Billing Basics	123
6.1.1.	Billing Start-Up	123
6.1.2.	In or Out-Of-Network Considerations	123
6.1.3.	Navigating Payer Contracts for Key Medical Billing and Coding Details	124
6.1.4.	Medical Billing Process	124
6.1.5.	Tips for Reporting Accurate Medical Bills	126
6.1.6.	Responsibilities of a Medical Billing Professional	127
6.2.	Acupuncture Office Billing Forms	127
6.2.1.	Superbill	127
6.2.2.	Claims	129
6.3.	Trends in Medical Billing	130
7.	Insurance Company Types and Billing Specifics	132
7.1.	Individual Payers	132
7.2.	Self-Ensured Plans	132
7.3.	Specialty Care Services	133
7.4.	Veterans Administration (VA)	133
7.5.	Workers Compensation	137
7.6.	Personal Injury	140
7.7.	Medicaid	142
7.8.	Medicare	142
7.8.1.	Original Medicare (Part B)	142
7.8.2.	Medicare Advantage (Part C)	148
7.9.	Cobra	148
7.10.	Spending & Savings Accounts	149
7.10.1.	Flexible Spending Accounts (FSA)	149
7.10.2.	Health Savings Account (HSA)	150
7.10.3.	FSA Versus HSA	152
7.10.4.	FSA and HSA Eligibility Details for Acupuncture Services	152
7.10.5.	Medical Savings Account (MSA)	154
7.10.6.	Health Reimbursement Arrangement (HRA)	154
8.	Insurance Payment and Recoupment	155
8.1.	Insurance Payment	155
8.1.1.	In-Network Provider Reimbursement	156
8.1.2.	Out-Of-Network Provider Reimbursement	156
8.2.	Explanation of Benefits (EOB) and Electronic Remittance Advice (ERA)	157
8.2.1.	Explanation of Benefits (EOB)	157
8.2.2.	Electronic Remittance Advice (ERA)	158
8.2.3.	Remittance Advice Reconciliation	158

8.2.4. Balance Wright-Off Guidelines	159
8.3. Claim Payment Recoupment	160
8.3.1. Statute of Limitations	161
8.3.2. Timely Recoupment Appeal	161
8.4. Insurance Claim Appeal	162
8.4.1. Reasons for Claim Denial	162
8.4.2. Writing an Appeal Letter Procedure	163
8.4.3. Appeal Letter Example	164
9. Audit	167
9.1. Audit Introduction	167
9.1.1. Factors Triggering Audit	168
9.1.2. Purpose of a Post-Payment Audit	168
9.1.3. Audit Procedures	168
9.1.4. Prepare for Audit	169
9.2. Lessons Learned from Published Audits	171
9.3. Best Practice Strategies for Audit Readiness	172
10. Billing to Patient	172
10.1. Fees Determination Rules	173
10.1.1. Usual and Customary Fees Based on the Insurance Rates Method	173
10.1.2. Usual and Customary Fees Based on the Cost of Doing Business Method	176
10.2. Discounts	176
10.2.1. Prompt-Pay Discounts	177
10.2.2. Self-Pay Discount	177
10.2.3. Marketing Discounts	178
10.2.4. Sliding Scale or Hardship Discounts	178
10.2.5. Prepaid Plans	178
10.2.6. Other Discounts	179
10.2.7. Free 15-minute Consultation	180
11. Glossary of Insurance Terms	180
12. Bibliography	188

Chapter 4 – Customer Service Standards

Learning Outcomes	193
1. Customer Service Standards	193
2. Front Desk Operations	195
2.1. Role of the Front Office in Maximizing Patient Retention	195
2.2. Scheduling Basics	196
2.2.1. Factors Affecting Scheduling	196
2.2.2. Primary Methods of Appointments	197
2.2.3. Schedule Patients Effectively	197
2.2.4. Optimize Front Desk Time	198
2.2.5. Optimize Scheduling Calendar Appearance	200
2.2.6. Scheduling Examples	200
2.2.7. Optimize Provider Time by Utilizing an Appointment Diversification Strategy	204
2.3. Scheduling and Checking-In in the EHR.....	207
2.3.1. Patient Scheduling Process	207
2.3.2. Patient Check-in Process	207
3. Components of the Health Record	209
3.1. Demographic Information	209
3.2. Billing Information	211
3.3. Problem List	211
3.4. Allergies List	212
3.5. Medication List	212
3.6. Supplements List	213

3.7. Cautions List	213
3.8. Vital Signs	213
4. Paper Health Records	213
5. Electronic Health Records (EHR)	214
5.1. Provider Portal	214
5.2. Patient Portal	216
6. Health Record Forms	217
6.1. Informed Consent	217
6.2. Health Information Forms	218
6.3. Financial Forms	219
6.4. Legal Forms	220
7. Bibliography	220

Chapter 5 – Evaluation Standards

Learning Outcomes	223
1. Documentation Standards	223
1.1. Ethical Considerations for Clinical Records	224
1.2. Inappropriate Documentation Prevention Guidelines	224
2. CMS Evaluation and Management (E/M) Documenting Requirements	225
2.1. General Principles of Evaluation and Management (E/M)	226
2.2. Updated CMS guidelines	226
3. Medical Decision Making (MDM)	227
3.1. Medical Decision-Making Elements	227
3.2. Number of Diagnoses and Management Options	228
3.3. Amount and Complexity of Data to be Reviewed	228
3.4. Risk of Significant Complications, Morbidity, and Mortality	229
3.5. Accuracy of Documentation	230
4. Basics of Documentation in the Clinical Practice	231
4.1. Note Types	231
4.2. SOAP Note Introduction	232
4.2.1. Common SOAP Notes Mistakes	232
4.2.2. SOAP Note Best Practices	232
4.2.3. Components of the Comprehensive SOAP Note	234
5. SOAP Note Elements of the Medical Decision Making (MDM)	235
5.1. Chief Complaint(s)	235
5.2. General Data	236
5.3. Subjective	238
5.3.1. History of Present Illness (HPI)	239
5.3.2. Functional Assessment Tools	240
5.3.3. Current and Prior Treatments	243
5.3.4. Adverse Events Monitoring	244
5.3.5. Review of Systems (ROS)	245
5.3.6. Past, Family, and Social History (PFSH)	249
5.3.7. Social Determinates of Health (SDH)	250
5.3.8. Notes on History and Exam Documentation	252
5.4. Objective	253
5.4.1. Vital Signs	253
5.4.2. Observation	253
5.4.3. Physical Examination	254
5.4.4. Review of Documentation from Other Healthcare Providers	258
5.4.5. Laboratory Studies and Other Diagnostic Tests Findings Results	259
5.4.6. Tongue and Pulse	261
5.5. Assessment	262
5.5.1. Traditional Medicine Clinical Impression	262

5.5.2. Traditional Medicine Theory	263
5.5.3. Treatment Strategy	263
5.5.4. Problem(s) Addressed	263
5.5.5. Traditional Medicine Pattern(s)	263
5.5.6. Traditional Medicine Treatment Principle(s)	263
5.5.7. Assessment Case Studies	263
5.6. Plan	266
5.6.1. Treatment modalities	266
5.6.2. Treatment Course Frequency and Duration	266
5.6.3. Treatment Goal(s)	267
5.6.4. Planned Therapy Outcomes	267
5.6.5. Labs and Tests Planned or Ordered	267
5.6.6. TCHM Prescribed	267
5.6.7. Supplements Recommended	267
5.6.8. Lifestyle Recommendations	267
5.6.9. Dietary Recommendations	268
5.6.10. Patient Education and Counseling	268
5.6.11. Acupuncture Encounter Plan Section Example	268
5.7. After-Visit Summary	269
6. Documenting Phone Call Communication	270
7. Documenting No-Show and Left-Without-Being-Seeing	270
8. Appendix – CMS Definitions	272
9. Bibliography	275

Chapter 6 – Acupuncture Procedure Standards

Learning Outcomes	277
1. Acupuncture Procedure Introduction	277
1.1. Definitions	277
1.2. Acupuncture CPT Codes Explanation	278
1.3. Adjunct Modalities Used in the Practice of Acupuncture	279
2. Documenting Acupuncture Procedure	279
2.1. Acupuncture Episode of Care	279
2.2. E/M Services CPT Codes Utilization in the Practice of Acupuncture	280
2.3. Elements of the Follow-up Acupuncture Procedure Encounter	281
3. Examples of the Follow-Up Acupuncture Procedure Encounter Note	283
3.1. Example of Documenting ONE Unit of Acupuncture	283
3.2. Example of Documenting TWO Units of Acupuncture	286
3.3. Example of Documenting THREE Units of Acupuncture	291
4. Acupuncture Dosage Determination	296
5. Acupuncture Adverse Events Identification	298
5.1. Contraindications for Acupuncture to Avoid Adverse Events (AE)	298
5.2. Cautions for Acupuncture to Avoid AE	298
5.3. Routine Screening Procedure for Potential Acupuncture Adverse Reactions (AR)	299
5.4. Acupuncture Adverse Event Grading	299
5.5. Strategies to Avoid AE Associated with the Acupuncture Procedure	299
5.6. Investigating Suspected Acupuncture AR	300
5.7. Acupuncture Adverse Events Classification	301
6. Documenting Adverse Events	302
7. Acupuncture and Adjunct Techniques Adverse Events Reporting	302
8. Acupuncture and Adjunct Techniques Adverse Events Mitigation Strategies	303
9. Acupuncture and Devices Used in the Practice of Acupuncture Regulation	305
10. Bibliography	306

Chapter 7 – TCHM Standards

Learning Outcomes	307
1. Traditional Herbal Medicine Worldwide	308
2. Herbal Medicine Regulations in the United States	309
3. Herbal Medicine Language Compliant with the FDA Guidelines	310
3.1. FDA Guidelines for a Small Entity Compliance Guide on Structure/Function Claims	311
3.2. FDA Compliant Language Guidelines for the TCHM Professional Education	315
4. Traditional Chinese Herbal Medicine Prescriptiology	316
4.1. Guidelines for TCHM Prescription Writing	316
4.1.1. TCHM Formula Prescription Elements	316
4.1.2. Requirements for Naming Herbs in the TCHM Professional Practice	316
4.1.3. Use of Abbreviations in Healthcare Records	316
4.1.4. TCHM Prescription Formulation Principles	317
4.1.5. TCHM Prescribing Guidelines	318
4.1.6. Dosage Determination Guidelines	318
4.1.7. Herbal Properties Affecting Dosage	319
4.1.8. TCHM Prescription Styles	320
4.1.9. TCHM Dose Calculation Case Studies	321
4.2. Dosing Challenges for Ready-made/Patent Preparations	326
4.3. TCHM Intake Duration Guidelines	328
4.4. TCHM Custom Compounded Formula Naming Guideline	328
5. Traditional Herbal Medicine Documentation Specifics	329
6. Traditional Herbal Medicine Coding	332
7. Herbal Medicine Supply Chain Standards	333
7.1. Growing Standards	333
7.2. Manufacturing Standards	333
7.2.1. Small Business TCHM Manufacturing	334
7.2.2. Large Business TCHM Manufacturing	334
7.3. Vendor/Distributor Standards	335
7.4. Custom Compounding TCHM Pharmacy/Dispensary Standards	336
7.5. TCHM Practitioner Standards	336
8. Traditional Chinese Herbal Medicine Dispensary	337
8.1. Preparation Forms of Traditional Chinese Herbal Medicine	337
8.1.1. Traditional Preparations Concentration and Safety Considerations	337
8.1.2. Modern Preparations Concentration and Safety Considerations	337
8.2. Administration of Traditional Chinese Herbal Medicine	338
8.2.1. Ready-made/Patent TCHM Products	338
8.2.2. Custom Compounded TCHM	339
8.3. Choosing Dispensing Practice	339
8.3.1. Dispensing Practice Considerations	339
8.3.2. Dispensary Types, Pros and Cons	340
8.4. TCHM Inventory Management	342
8.4.1. Ready-made/Patent TCHM Inventory	342
8.4.2. Custom Compounding Inventory	342
8.4.3. Return Policy Example	342
8.5. TCHM Custom Compounding Best Practices and Dispensary Setup	343
8.6. Updated Guidance on Allergens in TCHM	343
8.6.1. List of Major Food Allergens	343
8.6.2. Labeling Guidelines	344
8.6.3. List of Herbs Containing Potential Allergens	345
9. Contraindications and Risk Factors Identification	346
9.1. Contraindications and Cautions	346
9.2. Allergy Risk to TCHM	347
9.3. Liver Injury Risk	347

9.3.1. Liver Injury Classification	347
9.3.2. Liver Injury Risk Factors	348
9.3.3. Drugs and Chemicals That May Cause Liver Injury	349
9.3.4. Symptoms of Liver Failure	349
9.4. Kidney Injury Risk	350
9.4.1. Risk Factors for Drug-induced Incidences of Acute Renal Failure (ARF)	350
9.4.2. Acute Kidney Injury Grading	350
9.4.3. Acute Renal Failure (ARF) Types and Linked Drugs	350
9.4.4. Kidney Failure Symptoms	351
9.4.5. TCHM Nephrotoxicity	352
9.5. Conventional Medicine Approach to Drug-Herb Interactions	352
9.6. Traditional Medicine Approach to Drug-Herb Interactions	353
9.7. Herbs of Caution	353
10. Traditional Chinese Herbal Medicine Adverse Events Recognition	354
10.1. Therapeutic Effect	354
10.2. Adverse Reaction	355
10.3. Side Effect	358
11. Learn Traditional Chinese Herbal Medicine Adverse Events Prevention Strategies	358
11.1. Strategies to Avoid Adverse Events	358
11.2. Contraindications for TCHM to Avoid AE	359
11.3. Routine Screening for Potential Adverse Reactions (AR)	359
11.4. Cautions for TCHM to avoid AE	359
11.5. AE Grading	360
11.6. Investigating Suspected Adverse Reaction (AR)	360
11.7. TCHM Practitioner's Action if the Patient Reported Possible AR	361
12. Traditional Chinese Herbal Medicine Adverse Events Mitigation Strategies	362
13. Traditional Chinese Herbal Medicine Adverse Events Causality	364
14. Traditional Chinese Herbal Medicine Adverse Events Reporting	364
14.1. Adverse Events Collecting & Reporting Methods	364
14.2. Serious Adverse Event (SAE) Reporting Guidelines	365
14.3. TCHM AE Reporting	365
14.4. Traditional Chinese Herbal Medicine Adverse Event Report Example	366
15. Appendix A – COA examples	368
16. Bibliography	371

Chapter 8 – Labs/Tests Standards

Learning Outcomes	375
1. Labs Legal Regulations	375
1.1. Regulations Pertaining to Laboratories	375
1.1.1. Federal Regulations Pertaining to Laboratories	375
1.1.2. State Regulations Pertaining to Laboratories	375
1.2. Regulations Pertaining to Acupuncturists	376
2. Labs Ordering	377
2.1. Ethical Consideration for Labs Ordering	377
2.2. Lab Order Requisitioning Procedures	378
3. Imaging Tests Regulations	380
3.1. Regulations Pertaining to Imaging Centers	380
3.1.1. Federal Regulations Pertaining to Imaging Centers	380
3.1.2. State and Other Regulations Pertaining to Imaging Centers	381
3.2. Regulations Pertaining to Acupuncturists	381
4. Imaging Tests Ordering	383
4.1. Imaging Tests Most Frequently Utilized Within Acupuncturists' Scope of Practice	383
4.2. Imaging Tests Order Requisitioning Procedures	384

5.	Billing for Labs/Tests	386
5.1.	Services Covered by Administrative Fees	386
5.2.	Administrative Fee Collections Procedures	387
6.	Labs/Tests Considerations in Clinical Practice	388
6.1.	Clinical Practice Guidelines	388
6.1.1.	Acupuncturist Competences Related to Labs/Tests	388
6.1.2.	Ethical Considerations for Labs/Tests Ordering	389
6.1.3.	Guideline to Avoid Medical Errors	389
6.1.4.	Key Principles for Lab/Test Ordering, Interpretation, and Management	389
6.1.5.	Lab/Test Types Utilized by Acupuncturists	389
6.2.	Labs in Clinical Practice	390
6.2.1.	Factors Affecting Reference Range	390
6.2.2.	Clinical Significance of Laboratory Findings	394
6.2.3.	Laboratory Red Flag Findings	395
6.3.	Imaging Tests in Clinical Practice	396
6.3.1.	Clinical Considerations for Imaging Tests	396
6.3.2.	Clinical Appropriateness Framework for Ordering Imaging Studies	400
6.3.3.	Imaging Red Flags Findings	401
7.	Reinforce Labs/Tests Documenting Guidelines	402
7.1.	Documenting Lab Results in Patient's Records and Notes	402
7.2.	Documenting Imaging Test Results in Patient's Records and Notes	402
8.	Labs/Tests Communication to the Patient	405
8.1.	Ordering Recommendations Ethical Communication Guidelines	405
8.2.	Results Explanation Ethical Communication Guidelines	406
8.3.	Treatment Plan Key Communication Concepts	406
9.	Bibliography	407

Chapter 9 – Terminology Standards

Learning Outcomes	409	
1.	The Practice of Medicine Standardization Purpose	409
2.	ICD-11 Chapter 26 Traditional Medicine (TM1) Purpose	410
3.	Traditional Medicine Standardization History	412
4.	Chapter 26 (TM1) Overview	413
5.	Conventional Medicine Diagnosis Guidelines	414
5.1.	Establishing the Diagnosis	414
5.1.1.	Principles of Clinical Diagnosis	414
5.1.2.	Clinical Reasoning	415
5.2.	Documenting ICD-10-CM Conventional Diagnosis	416
5.2.1.	First-listed ICD-10 Diagnosis Selection Principles	416
5.2.2.	Multiple Comorbidities Coding Rules	418
5.2.3.	Counting Number of Diagnoses Addressed per Encounter Rules	418
5.2.4.	Diagnosis Specificity Coding Rules	418
5.2.5.	Problem Laterality Coding Rules	418
5.2.6.	Diagnosis Sequencing	419
5.2.7.	First-listed Diagnosis Coding During an Episode of Care	420
5.2.8.	Inappropriate Primary Diagnosis Codes	420
5.2.9.	TM Disorder Diagnosis Coding in the United States	420
5.3.	ICD-10 Coding Resources	421
6.	Traditional Medicine Diagnosis Guidelines	422
6.1.	TCM Diagnosis Principles	422
6.1.1.	TCM Etiology	422
6.1.2.	TCM Theories	423
6.1.3.	TCM Treatment Strategies	423
6.2.	TM Diagnosis Coding Rules	423

6.2.1.	TM Pattern Diagnosis Formulation Rules	423
6.2.2.	TM Diagnostic Concepts	424
6.2.3.	TM Pattern Codes Sequencing Rules	424
6.3.	Case studies	424
6.3.1.	Case Study # 1	424
6.3.2.	Case Study # 2	426
6.3.3.	Case Study # 3	427
7.	Adopting ICD-11 Chapter 26 for Non-TCM Acupuncture Styles	429
7.1.1.	Acupuncture Styles	429
7.1.2.	Non-TCM Style Coding Rules	429
8.	Documenting ICD-11 Chapter 26 TM1 Patterns in the EHR Guidelines	431
9.	ICD-11 Navigation Guide	432
10.	ICD-11 Chapter 26 TM1 Pattern Descriptions Table	437
11.	Bibliography	458

Chapter 10 – Legal Standards

Learning Outcomes	459
1. Healthcare Law Introduction	460
2. Confidentiality of Health Records (HIPAA)	461
2.1. Health Insurance Portability & Accountability Act (HIPAA)	461
2.2. Privacy Rule	461
2.2.1. What is PHI?	462
2.2.2. What is not PHI?	463
2.2.3. Privacy Rules Policies and Procedures Requirements	463
2.2.4. When may PHI be disclosed?	464
2.2.5. When PHI may NOT be disclosed?	464
2.2.6. Incidental Disclosures	464
2.2.7. PHI and Minors	465
2.3. Security Rule	465
2.3.1. HIPAA Breach Notification Rule	466
2.3.2. HIPAA Rules Enforcement	467
2.4. Notice of Privacy Practices	467
2.4.1. How the Notice Should be Made Available to Individuals	468
2.4.2. Communicate to Patients the Importance of HIPAA and the Benefits of EHR	469
3. HITECH Compliance	469
3.1. Meaningful Use	469
3.2. Cybersecurity	470
3.2.1. The Threat of Cyber-Attacks	470
3.2.2. Hacking	471
3.2.3. Tracking Technologies and Their Uses	471
3.2.4. Electronic Communication Safeguards	472
4. Office HIPAA Compliance	472
4.1. HIPAA Security Risk Assessment (SRA)	472
4.2. Personnel HIPAA Training	473
4.2.1. Most Common HIPAA Violations in the Office	473
4.3. Communication with Other Providers	474
4.3.1. HIPAA Compliant Care Coordination with Other Healthcare Providers	474
4.3.2. Use of PHI for Professional Education, Research, and Publications	474
4.4. HIPAA Compliant Patient Photography	475
4.5. Medical Records Release	476
4.5.1. Medical Records Release Authorization Form	477
5. Secure Communication	480
5.1. In-Person Patient HIPAA Compliant Communication	481

5.2. HIPAA Compliant Patient Communication via Mail	481
5.3. HIPAA Compliant Text Messaging	481
5.4. HIPAA Compliant Patient Communication via Telephone	482
5.5. HIPAA Compliant Communication via Email & App Messaging	482
5.5.1. HIPAA Violation Email Examples	483
5.5.2. Frequent Questions	483
5.6. Email Marketing	484
5.7. Social Media	485
5.7.1. Frequent Questions	485
5.7.2. Common Violations	486
6. Technology in Healthcare	487
6.1. HIPAA Compliant Payment Processing	487
6.2. Electronic Health Records (EHR) Systems	488
6.2.1. Keeping Your Patients' Health Information Secure with an EHR	488
6.2.2. Benefits of Electronic Medical Records	488
6.2.3. Barriers to Electronic Medical Records	489
6.2.4. Copy and Paste Practices in EHR	489
6.3. Telehealth Platforms	489
6.4. Artificial Intelligence (AI)	490
6.4.1. Challenges for AI in Healthcare	490
6.4.2. Generative AI HIPAA Compliance	490
6.5. Dictation Software	491
6.6. Grammar Software	492
6.7. Devices & Apps	492
7. ADA compliance	493
7.1. Accommodation of Patients with Disabilities in the Office	494
7.2. Accommodation of Patients with Disabilities on the Website	496
7.3. Accommodation of Patients with Communication Difficulties	497
7.4. Interpreter Services for Patients with Limited English Proficiency	498
7.5. Service Animals	500
8. Mandatory Reporting to Governmental Agencies	500
8.1. Duty to Report Abuse, Neglect and Exploitation	500
8.2. Reportable Diseases	501
9. Fraud and Abuse Laws	502
9.1. Fraud	502
9.1.1. False Claim Act	504
9.1.2. False Claims in Acupuncture Practice	504
9.2. Abuse Laws	505
9.2.1. Anti-Kickback Statute	505
9.2.2. Self-Referral Law - the Stark Law	505
9.2.3. PSQIA	506
10. Appendix: Example – CA Medical Records Release Authorization Form	507
11. Appendix: Example - Florida Infectious Disease Reporting Form	509
12. Bibliography	510

Chapter 11 – Clinic Standards

Learning Outcomes	513
1. Practice Start-Up	514
1.1 Join your State Professional Association	514
1.2 Graduate from the Accredited Acupuncture and Herbal Medicine College	514
1.3 Obtain National Board Certification	514
1.4 Obtain Occupational License	515
1.5 Prepare for Employment	515
1.5.1. Resume or CV and Cover Letter	515

1.5.2. Where to Find Posted Job Advertisements or Post Job Inquiries Yourself?	517
1.5.3. Interview Tips	517
1.6 Employment Options	518
1.6.1. I Received a Position Offer at the Hospital or Integrative Practice. What Next?	520
1.6.2. I Accepted the Hospital Employment. What is Next?	521
2. Business Set-Up	521
2.1. Form Business Entity	521
2.1.1. Name Your Business	521
2.1.2. Choose the Business Entity Type	522
2.1.3. Register the Business with the State	524
2.1.4. Establish an Operating Agreement for Your Business	525
2.2. Obtain Internal Revenue Service Number	525
2.3. Obtain Professional Liability Coverage with Proper Limits	525
2.4. Clinic Facility	526
2.4.1. Clinic Location	526
2.4.2. Commercial Lease	527
2.4.3. Local Building and Zoning Permits	529
2.4.4. Fire Department Inspection Certificate	529
2.5. General Liability Coverage	531
2.6. Business Tax Receipt	532
2.7. Biomedical Waste Permit	532
2.8. Seller's Permit	532
2.9. Financial Planning	534
2.9.1. Accounting & Tax Preparation Professional Services	534
2.9.2. Banking	536
2.9.3. Merchant	536
2.9.4. Bookkeeping	537
2.9.5. Establish Practice Fee Schedule	537
2.9.6. Budgeting	537
2.9.7. Determine Practice Financing Resources	540
2.10. Attorney Professional Services	540
2.11. Health Insurance, Financial Planner	541
3. Office Set-Up	541
3.1. HIPAA Privacy & Security Manual	542
3.2. Red Book	542
3.3. Emergency Response Manual.....	542
3.4. Employee Handbook	543
3.5. Office Policies & Procedures Manual	543
3.6. Clinic Procedures Manual	543
4. Support Team Development	543
4.1. Support Team	543
4.1.1. Office Maintenance	544
4.1.2. Marketing Support	544
4.1.3. IT Team	544
4.1.4. Clinic Support	545
4.1.5. Professional Support	545
4.2. Business Associate Agreement	548
5. Clinic Set-Up	549
5.1. Private Appointment Practice Model	550
5.2. Community Practice Model	550
5.3. Franchise Practice Model	550
5.4. Mobile Practice Model	550
5.5. Telehealth Practice Model	551
6. Pathway to Success	551
6.1. Best Strategies and Mistakes	551

6.1.1.	Ten Common Mistakes to Avoid When Starting a Medical Practice	551
6.1.2.	Roadblocks to Your Success as a New Practice	553
6.1.3.	Traits of a Successful Practice	553
6.2.	Marketing	554
6.2.1.	Best Practices for Acupuncture Marketing	554
6.2.2.	Marketing Budget	556
7.	Closing Your Practice: Retirement, Relocation, Selling Your Practice	557
8.	Bibliography	559

Chapter 12 – Telehealth Standards

Learning Outcomes	563	
1. Telehealth Position in the United States Healthcare	563	
1.1.	Economics of Telehealth	564
1.2.	Challenges of Telehealth	565
1.3.	Benefits of Telehealth	565
2. Law, Rules, and Regulations pertaining to Telehealth	566	
2.1. Practice of Telehealth	566	
2.1.1.	Definitions of Telehealth	566
2.1.2.	Telehealth Regulations Recourses	566
2.1.3.	Does Telemedicine Law Apply to Acupuncturists?	568
2.1.4.	May I Practice via Telehealth Internationally?	569
2.1.5.	May I Practice via Telehealth Across State Lines?	569
2.1.6.	Patient-Provider Relationship Establishment Rules	569
2.1.7.	Scope of Practice	570
2.1.8.	Hospital Telehealth Practice Regulations	570
2.2. Professional Liability Insurance for Telehealth	570	
3. HIPPA Compliance	571	
3.1. HIPAA Specifics to Telehealth	571	
3.1.1.	HIPAA Security Rule	571
3.1.2.	HIPAA Compliant Telehealth Phone Calls	572
3.1.3.	Privacy Rule HIPAA Telehealth Challenges	573
3.1.4.	HITECH Act	574
3.1.5.	HIPAA Compliant Telemedicine Business Associates	574
3.2. Telehealth Ethics	574	
3.2.1.	Respect Patient Boundaries	574
3.2.2.	Respect Clinician Boundaries	574
3.3. Consent for Telehealth	574	
3.3.1.	Telehealth Consent Regulations	574
3.3.2.	Telehealth Consent Content	575
3.4. ID Verification	576	
4. Telehealth Logistics	576	
4.1. Telehealth Software Vendor Selection	576	
4.2. Telehealth Logistics	577	
4.2.1.	Types of Telemedicine/Telehealth	577
4.2.2.	Telemedicine Set Up	577
4.2.3.	Starting Telehealth	577
4.2.4.	Team-Based Telehealth Workflows	578
4.2.5.	Telehealth Encounter Scheduling	578
4.2.6.	Backup Plan for Technology Failures	578
4.3. Telehealth Etiquette	578	
4.3.1.	Provider Telehealth Visit Etiquette Checklist	578
4.3.2.	Patient Telehealth Visit Instructions	580
5. Telehealth Practice Standards	580	
5.1. Practice Standards	580	

5.2. TCM via Telehealth.....	581
5.2.1. TCM Modalities Suitable for Telehealth Delivery	581
5.2.2. TCM Modalities that CANNOT be Performed via Telehealth	581
5.3. Health Problems Management via Telehealth	582
5.3.1. Health Problems Appropriate for Evaluation and Management via Telehealth	582
5.3.2. Health Problems NOT Appropriate for Evaluation and Management via Telehealth	582
5.3.3. Severe or Life-Threatening Problems that are NOT Suitable for Telehealth	582
5.4. TCM History and Objective Signs via Telehealth Collection Guidelines	582
5.4.1. History of Present Illness	582
5.4.2. Diagnostic Studies	583
5.4.3. Observation and Physical Examination	583
5.4.4. Traditional Medicine Tongue and Pulse via Telehealth	584
5.5. Telehealth Documentation Specifics	588
6. Coding & Billing for Telehealth	588
6.1. Telehealth Coding Guidelines	588
6.2. Telehealth Billing	591
6.2.1. Private Payer Parity Law	591
6.2.2. Private Insurance Billing	591
6.2.3. Billing to Patient	591
7. Bibliography	593
Appendix	
APHA Guidance: Best TCHM Compounding and Dispensing Practices	595