March 2nd 2017

Attn: Board of Registration in Medicine

Committee on Acupuncture

Eileen Prebensen

Re: 243 CMR 5.03(1)(a)(3) & 243 CRM 5.05(1)(l)

Undergraduate foreign non-acupuncture transcript evaluation

Dear Ms. Prebensen,

As a current applicant for an acupuncture license in Massachusetts with a foreign undergraduate degree, I have encountered many barriers and additional costs which I believe can be greatly streamlined to improve the process for both the applicant and the MA Board of Registration in Medicine’s Committee on Acupuncture.

I propose the following changes:

243 CMR 5.03 (1)(a)(3)

Educational Requirements for Full Licensure

(1) Undergraduate Education.

(a) An applicant for full licensure shall successfully complete two full academic years (a minimum total of 60 semester accredited hours or 90 quarter accredited hours, or the equivalent) of undergraduate education at:

1. an accredited college or university;

2. an institution approved by the Massachusetts Department of Education; or

3. a foreign university or college that the Committee deems equivalent to an accredited college or university.

**⇒ 3. A foreign university or college that was deemed equivalent to an accredited college or university either by the Committee or by a US educational credential evaluating agency recognized by the U.S. Department of Education (e.g. World Education Services (WES).**

Reason for Change

WES reports contain information regarding accreditation from the school the applicant graduated from (see page 1 of an attached WES report).

243 CMR 5.05 (1)(l)

Application Provisions

(1) Contents of the Application Form for a Full License. The Committee's application form for a full license will request the following information:

(l) an official transcript sent directly from the applicant's undergraduate college or university;

**⇒ (l) an official transcript sent directly from the applicant’s undergraduate college or university. In case of applicants with foreign undergraduate degrees, alternatively, an official course-by-course evaluation sent directly from a US educational credential evaluating agency recognized by the U.S. Department of Education (e.g. World Education Services).**

Reason for Change

Currently, COA requires undergraduate transcripts to be sent directly from foreign undergraduate institutions in a sealed envelope with the amount of didactic hours and enumeration of subjects studied. In addition, a school validation form issued by COA needs to be completed by the academic institution and included in the package along with translation. A credential evaluation report from a US evaluation service would eliminate the need for applicants to obtain transcripts or the school validation form. Such report would contain subject studied, hours, degree equivalency, information about diplomas and degrees conferred and translation. See pages 2-3 of an attached WES report.

**In addition**, **I propose to eliminate the requirement to submit an original foreign undergraduate diploma with a notarized copy and a translation for applicants who received their acupuncture education in the US, but went to undergraduate schools abroad. An undergraduate degree evaluation report from an established evaluation agency should be sufficient.** For example, in order to initiate diploma/transcript evaluation with the World Education Services (WES), an original diploma and transcript must be sent directly to them along with a translation. Additionally, WES requires applicants to obtain the Hague Convention Apostille stamp on the above mentioned documents. This stamp is the only recognized proof of authenticity of signatures and stamps on educational documents. The US is a member of the Apostille Treaty and is able to recognize the validity of educational documents carrying the Hague Convention Apostille stamp. The fact that WES evaluations require Apostille gives their reports the highest level of credibility that is relied upon by educational and professional organizations all over America.

Department of State, for example, does not accept foreign transcripts for purposes of employment, instead they require official reports from evaluating agencies like WES:

**Foreign education transcripts will not be accepted.** Foreign education (that is education acquired outside of any State of the U.S., the District of Columbia, the Commonwealth of Puerto Rico, a Trust Territory of the Pacific Islands, or any territory or possession of the U.S.) must be evaluated by a credential evaluation service recognized by the U.S. Department of Education in order to be credited towards qualification.

**Applicants can request an evaluation from a member organization of one of the two national associations of credential evaluation services:**

**National Association of Credential Evaluation Services (NACES)** is an association of 19 credential evaluation services with admission standards and an enforced code of good practice.

**Association of International Credentials Evaluators (AICE)** is an association of 10 credential evaluation services with a board of advisors and an enforced code of ethics.

Source:<https://www.state.gov/m/dghr/flo/219100.htm>

The whole process of credential evaluation at agencies like WES takes time and money. Most foreign-educated students had gone through such evaluation process prior to enrollment in acupuncture school. Having these students essentially go through the same process one more time during the acupuncture license application puts additional burden on the applicants and potentially delays licensure.

To sum up the benefits of the above-proposed changes:

1. Reduced burden/easier application process for applicants with international bachelor

degrees.

2. Reduced administrative burden for the Board of Registration in Medicine in the process

of educational credential evaluation.

3. Clear and credible presentation of educational credentials that leaves no room for errors

or misinterpretations.

I would like to describe to you, briefly, my own experience with foreign educational credentials and acupuncture license application.

Having familiarized myself with the rules in the Acupuncture Full Kit document (<http://www.mass.gov/eohhs/docs/borim/kits/acupuncture-full-kit.pdf>) I went through the process of obtaining the undergraduate transcript from my school - Moscow State Linguistic University. On a side note: in Russia, university diplomas are issued to graduates along with an official transcript, and issuing transcripts by request is not a common occurrence, as it is in the US. If it is requested, it is not called a transcript, rather, it is a very detailed summary of all courses and subdivisions of courses taken with grades and hours. The final transcript that comes with the diploma is a condensed version of this detailed report. Sadly, my school, like many Russian colleges, does not issue “transcripts” in English. Nor it is common practice to seal transcripts. Nor does the registrar speak English - it became an added responsibility for me to guide them to fill out the COA school validation form and seal the envelopes properly. I had to call the school registrar’s office (taking into account an 8 hour difference) countless times to be sure to explain to the clerk what is required of them. I paid my school 5000 rubles ($90 equivalent) to issue the transcript. Then I paid $85 to have the documents shipped to the US. The translation of the original diploma plus transcript costs $320. Altogether I have spent over $500 and it took me over 2 months to complete the process.

In the meantime, I happen to have a course-by-course evaluation of my diploma and original transcript at WES, and it would only cost me $37 to request WES to send the report to COA, and one week later it would get there by mail.

Clearly, the current process of vetting educational credentials during acupuncture licensing is burdensome to applicants who come from foreign countries. It is counterintuitive to the American values of inclusion of those who come from other cultures and want to adapt and be successful citizens.

In my 4 years at NESA, I have witnessed a steady increase in international students, many of whom are planning to join the workforce in the US for a year after school, and many others are naturalized citizens, like myself. I hope that my efforts in advocating for making this process easier will be answered positively, and the resulting change will be beneficial, if not for myself, then for future applicants.

Sincerely,

Katya Kudryavtseva, MA

Candidate for Master of Acupuncture and Oriental Medicine, May 2017

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