

Acupuncture for Chronic Migraine and Chronic Tension-type Headache

Topic Nomination and Draft Key Questions:
Public Comments and Response

September 30, 2021

Health Technology Assessment Program (HTA)

Washington State Health Care Authority

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Acupuncture for Chronic Migraine and Chronic Tension-type Headache

Provided by:



Aggregate Analytics, Inc.

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Responses to clinical and peer reviewers

Aggregate Analytics is an independent vendor, contracted to produce evidence assessment reports for the Washington Health Technology Assessment (HTA) program. For transparency, all comments received during public comment periods are included in this document and attachments. Comments related to program decisions, process or other matters not pertaining to the evidence report, are acknowledged through inclusion only.

Responses to public comments made during topic nomination are included **Table 1**.

Comments from:

- Professional Association
 - Iman Majd, MD, MS, FAMP/Lac, Dipl. ABFM, ABOLM, Dipl. Ac., (NCCAOM®), DABMA, ABIHM Chair, NCCAOM Board of Commissioners
 - Steve Sebers DC, FIANM, Chief Clinical Officer, The CHP Group
 - Jian Feng Yang, WAEMA Board President, Washington Acupuncture and Eastern Medicine Board of Directors
- General Public
 - Patients
 - Lisa Callan
 - Natalie Henton
 - Bridget Johns
 - Joy Lewis
 - Lori Pitman
 - Deric Villanueva
 - Providers
 - Curt Eschels, Lac – retired
 - Lori Field, NCCAOM® certified acupuncturist; Abundant Life Acupuncture
 - Megan Kingsley Gale, MSAOM, Dipl. OM (NCCAOM®) LAc, LMT
 - Rebecca Kitzerow, LAc, MSAOM; All Ways Well
 - Melissa Kohler, ND, Lac; Natural Health Clinic of Olympia
 - Greg Lewerenz, DAHM, EAMP, C. SMA, CMTPT, LMT, RYT; Foster Wellness
 - Eugene Mahoney, EAMP, Lac; Aerimid Acupuncture @ North Seattle Natural Medicine
 - Roberto Masferrer, EAMP; Kumo Acupuncture and Oriental Medicine
 - Nikki Medghalchy, DAOM, LAc; Advanced Acupuncture and Chinese Herbal Clinic
 - Yvonne Pastika, Lac
 - Trevor Seigny LAc, MSAOM; Sound Medicine/Seattle Acupuncture Associates
 - John Silliman, EAMP; Emphyrean Acupuncture
 - Laurie Solomon, LAc
 - Mia Song, EAMP
 - Katharine Ting, ND, LAc

- Angie Yin, LAc
- Anna, LAc; Solution-based Acupuncture
- Other
 - Nick Spurlock, Bastyr University

Responses to public comments to the Draft Key questions are found in **Table 2**.

Comments from:

- Natalie Pascale Boisseau, LAc, EAMP, Board member, WAEMA, Innate Radiance Clinic

Full text of public comments on Topic Nomination and the Draft Key Questions follow the tables.

Table 1. Responses to comments for topic nomination

Comment		Response
Commenter: Iman Majd, MD, MS, FAMP/L.Ac., Dipl. ABFM, ABolM, Dipl. Ac., (NCCAOM®), DABMA, ABIHM Chair, NCCAOM Board of Commissioners		
Specific comments		
Main body of comments reproduced	<p>Please find attached [below] my professional opinion on acupuncture for headache and migraines. I am a practicing physician and licensed acupuncturist at UW, Department of Family Medicine and I have found acupuncture to be beneficial for my patients who suffer from headache and migraines. I am currently serving as the Chair of the Board of the NCCAOM. Please feel free to reach out in case you might have any questions.</p> <p>The National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM®), commends the Health Technology Assessment (HTA) program for reconsidering acupuncture as a viable solution for the treatment of migraine and chronic tension-type headaches. About our organization, NCCAOM is the only national organization that validates entry-level competency in the practice of acupuncture and herbal medicine through professional certification across the nation. There exists substantial evidence in both clinical outcomes as well as in-depth research for the continued use of acupuncture for chronic migraine and tension-type headaches. Among these reasons, are</p> <ul style="list-style-type: none"> • Acupuncture is safe when performed by licensed practitioners • Acupuncture is effective as compared to other conventional interventions • Acupuncture is cost effective and reduces incidence of more expensive procedures Migraine and severe headaches are estimated to affect approximately 15.9% of Americans annually. 	<p>Thank you for your comments.</p> <p>All publications cited as evidence will be considered for inclusion based on the inclusion/exclusion criteria for the evidence report.</p>

Comment	Response
	<p>In addition to lost productivity, severe migraine headaches can often lead to more costly interventions including ED and office visits¹. Acupuncture has strong clinical evidence for its use in treating migraine and tension headaches. In fact, Acupuncturists regularly treat these types of ongoing pain conditions as acupuncture has become a first-line treatment recommendation for pain. Headaches of multiple origins, acute and chronic, are one of the most commonly referred conditions to clinicians across the country.</p> <p>Clinically significant research reveals acupuncture maintains a body of evidence to support its use for these kinds of conditions.</p> <p>Amongst several high-quality trials involving thousands of participants, the 2009 Cochrane review by Linde and colleagues² found that there is consistent evidence that acupuncture is beneficial in the treatment of acute migraine attacks and that the available studies suggest that acupuncture is at least as effective as prophylactic drug treatment and has fewer adverse effects.</p> <p>Furthermore, acupuncture has been reviewed as compared to other methods of treatment regarding chronic headaches, such as botulinum toxin A injections, or Botox. A recent review showed significant reduction of pain severity in control groups receiving both types of interventions. However, the research notes increased effectiveness with fewer adverse effects in the Acupuncture groups³ as compared to botulinum toxin type A.</p> <p>In addition to clinical efficacy, acupuncture remains a safe procedure when performed by certified and trained providers. Multiple studies show low incidence rates of adverse effects from acupuncture. Additionally, the high standards set by the NCCAOM through its testing and certification process to ensure entry level qualifications, reinforces this fact. NCCAOM National Board-Certification adds to public safety and awareness of preferred providers as well as keeping high standards for clinical outcomes.</p> <p>In conclusion, the NCCAOM, once again, commends the HTA for its consideration and review of acupuncture for the treatment of migraine and tension-type headaches.</p> <p>References:</p> <ol style="list-style-type: none"> 1. Burch, R., Rizzoli, P. and Loder, E. (2021), The prevalence and impact of migraine and severe headache in the United States: Updated age, sex, and socioeconomic-specific estimates from government health surveys. Headache:

Comment		Response
	<p>The Journal of Head and Face Pain, 61: 60-68. https://doi.org/10.1111/head.14024.</p> <p>2. Linde K, Allais G, Brinkhaus B, et al. Acupuncture for migraine prophylaxis. Cochrane Database Syst Rev 2009;(1):CD001218.</p> <p>3. Naderinabi, B., Saberi, A., Hashemi, M., Haghighi, M., Biazar, G., Abolhasan Gharehdaghi, F., Sedighinejad, A., & Chavoshi, T. (2017). Acupuncture and botulinum toxin A injection in the treatment of chronic migraine: A randomized controlled study. Caspian journal of internal medicine, 8(3), 196–204. https://doi.org/10.22088/cjim.8.3.196</p>	
Commenter: Steve Sebers, DC, FIANM, Chief Clinical Officer, The CHP Group		
Specific comments		
Main body of Comments reproduced	<p>The CHP Group, an Oregon based preferred provider organization has been providing a network of chiropractic and naturopathic physicians, acupuncturists, and massage therapists to various insurers in the Pacific Northwest for many years in support of evidence-based integrative healthcare services.</p> <p>Please consider the following an evidence-based summary in support of coverage for acupuncture treatment for migraine headaches and chronic tension-type headaches (TTH).</p> <p><u>PRIMARY HEADACHE</u> Primary headache (TTH, migraine, and chronic headache), is a key contributor to the development of chronic pain (#3 leading cause behind low back pain and arthritis).[1] Based on the most recent biomedical treatment guidelines[2, 3] three levels of care are recommended when managing primary headache: 1) patient education (including lifestyle modification), 2) acute treatment, and 3) prophylactic treatment. Although treatment strategies differ based on headache classification and individual patient presentation, the goal is to recognize the most appropriate <i>combination</i> of therapies that can provide meaningful resolution of symptoms.</p> <p>Systematic reviews conducted by the Cochrane collaboration in 2016, conclude that acupuncture is an effective treatment option for the management of primary headache. In support of these findings, a recent overview of the most current and “informative” systematic reviews concluded that, “<i>the current state of the literature is that there is a sufficient number of published trials...[which,] provide ample evidence that acupuncture is effective as an adjunct to usual care in the management or prevention of common headache</i></p>	<p>Thank you for your comments.</p> <p>All publications cited as evidence will be considered for inclusion based on the inclusion/exclusion criteria for the evidence report.</p>

Comment	Response
	<p><i>disorders...”[4] These findings are further strengthened by data suggesting that adjunctive acupuncture is a cost-effective option for the management of both TTH and migraine headache.[5, 6] Not surprisingly, both the British and Scottish National guidelines suggest acupuncture as an adjunctive therapy for the management of primary headache.[7, 8]</i></p> <p>The accumulated evidence suggests that acupuncture is an effective health care option for the treatment of TTH, migraine, and chronic headache. Based on the literature, the following conclusions can be drawn:</p> <p>Tension Type Headache <i>The evidence supports the benefit of acupuncture for the treatment of Tension-Type Headache (TTH).</i></p> <ul style="list-style-type: none"> • The most recent (comprehensive) systematic review concludes that acupuncture is a beneficial treatment option.[9] <p><i>The evidence supports the cost-effectiveness of acupuncture for the treatment of TTH.</i></p> <ul style="list-style-type: none"> • A large-scale (N=3,182) pragmatic RCT suggests acupuncture adjunctive to other therapies is costeffective.[5] [N.B. Analysis was of primary headache participants: TTH 46%; Migraine 54%] <p>Migraine Headache <i>The evidence supports the benefit of acupuncture for the treatment of migraine headache.</i></p> <ul style="list-style-type: none"> • The most recent (comprehensive) systematic review concludes that acupuncture is a beneficial treatment option.[10] <ul style="list-style-type: none"> ○ A newly published RCT (n=249) supports the review’s main findings.[11] <p><i>The evidence supports the cost-effectiveness of acupuncture for the treatment of migraine.</i></p> <ul style="list-style-type: none"> • Two larger-scale (N=3,182; N=401) pragmatic RCTs suggest acupuncture adjunctive to other therapies is cost-effective.* [5, 6] [*Analysis was of primary headache participants: Migraine 54%; TTH 46%] <p>Chronic Headache <i>The evidence supports the benefit of acupuncture for the treatment of chronic headache.</i></p> <ul style="list-style-type: none"> • The most recent systematic review concludes that acupuncture is a beneficial treatment option.[12] <p>Currently many insurers, including commercial, Medicare Advantage, and Medicaid programs provide coverage for</p>

Comment	Response
	<p>acupuncture services for these conditions based on this and other evidence. The inclusion of non-pharmacologic modalities such as acupuncture for migraine headaches and TTH is essential as a first line and adjunctive evidence-based treatment option to improve patient outcomes as well as address the Opioid crisis which remains a public health emergency.</p> <p>Let me know if you have any questions and thank you for your consideration of this evidence-based review.</p> <p>References</p> <ol style="list-style-type: none"> 1. Gaskin DJ, Richard P. The economic costs of pain in the United States. <i>J Pain</i>. 2012;13(8):715-24. 2. Beithon J GM, Johnson K, Kildahl P, Krenik J, Liebow M, Linbo L, Myers C, Peterson S, Schmidt J, Swanson J. Diagnosis and treatment of headache. 2013:84. 3. Becker WJ, Findlay T, Moga C, Scott NA, Harstall C, Taenzer P. Guideline for primary care management of headache in adults. <i>Can Fam Physician</i>. 2015;61(8):670-9. 4. Coeytaux RR, Befus D. Role of Acupuncture in the Treatment or Prevention of Migraine, Tension-Type Headache, or Chronic Headache Disorders. <i>Headache</i>. 2016;56(7):1238-40. 5. Witt CM, Reinhold T, Jena S, Brinkhaus B, Willich SN. Cost-effectiveness of acupuncture treatment in patients with headache. <i>Cephalalgia</i>. 2008;28(4):334-45. 6. Wonderling D, Vickers AJ, Grieve R, McCarney R. Cost effectiveness analysis of a randomised trial of acupuncture for chronic headache in primary care. <i>BMJ</i>. 2004;328(7442):747. 7. Scottish Intercollegiate Guidelines Network 2008;Pageshttp://www.sign.ac.uk/guidelines/fulltext/107/index.html2012. 8. MacGregor EA ST, Davies PTG. Guidelines for All Healthcare Professionals in the Diagnosis and Management of Migraine, Tension-Type, Cluster and Medication-Overuse Headache. In: Writing Committee: EA MacGregor TS, PTG Davies, ed. 3rd edition (1st revision) ed. Online: British Association for the Study of Headache; 2010. 9. Linde K, Allais G, Brinkhaus B, Fei Y, Mehring M, Shin BC, et al. Acupuncture for the prevention of tension-type headache. <i>Cochrane Database Syst Rev</i>. 2016;4:CD007587. 10. Linde K, Allais G, Brinkhaus B, Fei Y, Mehring M, Vertosick EA, et al. Acupuncture for the prevention of episodic migraine. <i>Cochrane Database Syst Rev</i>. 2016(6):CD001218. 11. Zhao L, Chen J, Li Y, Sun X, Chang X, Zheng H, et al. The Long-term Effect of Acupuncture for Migraine Prophylaxis: A Randomized Clinical Trial. <i>JAMA Intern Med</i>. 2017;177(4):508-15.

Comment		Response
	12. Sun Y, Gan TJ. Acupuncture for the management of chronic headache: a systematic review. Curr Res Anesth Analg. 2008;107(6 PB - International):2038-47.	
Commenter: Dr. Jian Feng Yang, WAEMA Board President, On behalf of The Washington Acupuncture and Eastern Medicine Board of Directors		
Specific comments		
Main body of Comments reproduced	<p>The Washington Acupuncture and Eastern Medicine Association (WAEMA) would like to thank you for your review of acupuncture for chronic migraine and tension type headaches. After discussion with our community, it became clear that not only do many acupuncture practitioners have personal experience with offering successful treatments to their patients for migraines and headaches in general but there is also substantial evidence and institutional acceptance of this treatment to further support of our experiences.</p> <p>We have already submitted many strong research studies that support the use of acupuncture for migraines for review, and we also want with this letter to punctuate the current level of support within the healthcare system for this treatment. The Veterans Administration (VA) has conducted their own literature reviews and research demonstrating that acupuncture for migraines and headaches have evidence of positive effects, substantial body of evidence resulting in high confidence in the treatment. (1) The National Center for Complimentary and Integrative Health also supports acupuncture for chronic headaches:</p> <p><i>“Results from a number of studies suggest that acupuncture may help ease types of pain that are often chronic such as low-back pain, neck pain, and osteoarthritis/knee pain. It also may help reduce the frequency of tension headaches and prevent migraine headaches. Therefore, acupuncture appears to be a reasonable option for people with chronic pain to consider.” (2)</i></p> <p>The American Migraine foundation also recommends acupuncture treatment for Migraines:</p> <p><i>“Based on a recent systematic review of 22 clinical trials involving 4985 people, there is evidence that acupuncture reduces the frequency of headache in individuals with migraine, and that the effect may be similar to that observed with preventive medications. The frequency of headache is dropped by 50% or more in up to 59% of individuals receiving acupuncture and this effect can persist for more than 6 months.”(3)</i></p>	<p>Thank you for your comments.</p> <p>All publications cited as evidence will be considered for inclusion based on the inclusion/exclusion criteria for the evidence report.</p>

Comment	Response
	<p>And most recently we have this research that just came out this year, the ACUMIGRAN study; this study compared acupuncture treatments with pharmacological treatments for migraine, comparing headache frequency at the end of treatment:</p> <p><i>“Data suggested that acupuncture could be adopted as migraine prophylaxis and seem to be slightly superior to pharmacological treatment in compliance and rate of adverse events.” (4)</i></p> <p>Evidence continues to grow in support of acupuncture for migraines and tension-type headaches. Not only is the treatment effective but it is cost effective and safe, short term and long term. All medical professionals take an oath before they are allowed to practice stating their commitment to do no harm. Acupuncture as a form of medicine offers a safe and reliable approach. From an overview of systematic reviews on migraines it was “concluded that acupuncture treatments had fewer adverse events than medication, which indicated that acupuncture was a safe therapy for migraine.” (5)</p> <p>The Health Care Authority (HCA) has supported botulism toxin (Botox) treatments for headaches. While these studies show few adverse events directly after the treatment, some longterm consequences come later when the toxin begins to spread throughout the body.</p> <p><i>“Onabotulinumtoxin A injection is given as a number of tiny injections intended to affect only the specific area where injected. However, it is possible that the medication may spread from the area of injection and affect muscles in other areas of the body. If the muscles that control breathing and swallowing are affected, you may develop severe problems breathing or swallowing that may last for several months and may cause death. If you have difficulty swallowing, you may need to be fed through a feeding tube to avoid getting food or drink into your lungs.” (6)</i></p> <p>The treatment uses a neurotoxin which can lead to nerve damage (7) and weakness of the neck muscles among other complications. Acupuncturists have reported cases of patients coming in with this issue and seeking acupuncture to not only help with the migraines, but to also help recover from the Botox treatments’ long-term effects. Not only does acupuncture help directly with the relief of migraines but it can also further complement Botox treatments by minimizing the side effects – it is a primary treatment as well as a complementary treatment.</p>

Comment		Response
	<p>Acupuncture as a treatment for migraines and tension type headaches has a growing body of evidence demonstrating efficacy as well as safety short term and long term. The entire medical community and healthcare system are always in search of the best solutions and treatment venues for whole patient care with lasting effects. Research and experience alike have shown that not only is acupuncture safe and effective for treatment of chronic migraines and tension type headaches, but it also cost effective.(8)</p> <p>Notes:</p> <ol style="list-style-type: none"> 1. https://www.hsrd.research.va.gov/publications/management_briefs/default.cfm?ManagementBriefsMenu=ManagementBrief-no78 2. https://www.nccih.nih.gov/health/acupuncture-in-depth?nav=govd 3. https://americanmigrainefoundation.org/resource-library/understandingmigraineacupuncture-and-migraine-finding-a-combination-that-sticks/ 4. https://www.frontiersin.org/articles/10.3389/fneur.2020.570335/full 5. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7125485/ 6. https://medlineplus.gov/druginfo/meds/a608013.html 7. https://www.sciencedaily.com/releases/2015/04/150416094051.htm 8. https://www.sciencedirect.com/science/article/abs/pii/S0965229912000805 	
Commenter: Lisa Callan (patient)		
Specific comments		
Main body of Comments reproduced	<p>I am writing asking for consideration to cover the use acupuncture for hormonal, tension and migraine headaches. I have had great success minimizing the degree, number, and type of headaches I have experienced throughout different periods of my life and health circumstances. If you have questions or need further information please let me know.</p>	Thank you for your comments.
Commenter: Natalie Henton (patient)		
Specific comments		
Main body of Comments reproduced	<p>Hello! I currently receive acupuncture treatment at Alpine Acupuncture in Issaquah, WA and heard that comments were welcomed from people whom treatment has helped for headaches and migraines. I am one of those people! Acupuncture treatment has given me immediate</p>	Thank you for your comments.

Comment		Response
	relief on several occasions, as well as continued healing even days after.	
Commenter: Bridget Johns (patient)		
Specific comments		
Main body of Comments reproduced	Recently I've been having daily headaches due to tension in my neck and have been getting acupuncture treatments for it. It is pretty amazing how much relief I get from just one treatment. My headaches go away almost instantly, and I am so grateful to be able to have acupuncture as an option for relief.	Thank you for your comments.
Commenter: Joy Lewis (patient)		
Specific comments		
Main body of Comments reproduced	I use acupuncture for chronic migraine and chronic tension-type headaches. The treatments I've received have reduced my use of prescription medications and helped me to take no time off work. It's been a game changer in my health care and I need it be covered by my insurance to live a healthier life.	Thank you for your comments.
Commenter: Lori Pitman (patient)		
Specific comments		
Main body of Comments reproduced	<p>I have been treated by acupuncture to cure many types of headaches including tension and migraine. When traditional medicine does not work or if medication I have been prescribed gives me terrible side effects, I feel in despair of not being able to live a healthy life. However, I always know I can count on my acupuncturist to help me. Lately, I have been going to him for help with headaches post surgery. He also got me through very tough times while I was recovering from a severe concussion. He was the Only doctor that was able to help me!!!</p> <p>Please understand how it is important to have this type of treatment covered by insurance. There are many people like me that need acupuncture to be able to lead a productive life!</p>	Thank you for your comments.
Commenter: Deric Villanueva (patient)		
Specific comments		
Main body of Comments reproduced	<p>Greetings</p> <p>I was under the care of Carleton Magus acupuncture and herbal medicine for migraine, insomnia and chronic pain in my shoulder and neck. The treatments lasted until my employer's health insurance no longer covered acupuncture.</p> <p>Before treatments I experienced migraine headaches once or twice a month. After the 1st month of treatment and after</p>	Thank you for your comments.

Comment		Response
	<p>subsequent months I experienced a reprieve from migraines and had so few recurrences as to consider the treatment successful. Since I have stopped acupuncture I am now experiencing regular migraine headaches for which I am treating with western pharmaceuticals.</p> <p>Moreover my insomnia has returned and I live with fewer than 24 hours of sleep a week. I hope to resume acupuncture again when my insurance allows.</p>	
Commenter: Curtis Eschels (retired provider)		
Specific comments		
Main body of Comments reproduced	<p>The Health Care Authority requested comments on the effectiveness of acupuncture in treating chronic migraine and tension headaches. I am submitting comments based on my Master's-level acupuncture degree, national certification and nineteen years of practice. I have treated headaches as part of a wide-ranging practice for pain, injuries and diseases.</p> <p>My experience had a much higher rate of success in relieving headaches than the randomized, controlled trials (RCTs) reported in the formal literature. Although my results are qualitatively more favorable, I did not document my clinical work with case studies or case reports. Nevertheless, comparing these positive clinical, empirical results to controlled trials and systematic reviews will be a constructive addition to your work.</p> <p>I support the use of systematic reviews and randomized control trials as part of reviewing comparative strategies for pharmaceutical and other medical procedures. I understand that the Board of Directors of the Washington Acupuncture and Eastern Medicine Association submitted evidence for the 2017 review, and it has submitted material this year about newer research.</p> <p>Certain qualities of RCTs – designed to narrow the study scope to measure the effect of a single variable – make the intricacies of acupuncture treatment invisible to the researchers. Understanding the intricacies explains acupuncture's effectiveness, higher than measured in western trials.</p> <p>Headache is one of the most common symptoms encountered by health care providers. However, chronic migraine and tension-type headaches have different presentations and different causes. Treatment with Traditional Chinese Medicine recognizes those wide-ranging differences.</p>	<p>Thank you for your comments.</p> <p>Per the scope of the report, the focus will be on peer-reviewed studies with the least potential for bias such as high-quality systematic reviews of randomized controlled trials which focus on the population of interest and randomized controlled trials and full economic studies. If no RCTs are identified, nonrandomized studies will be considered per the PICOTS.</p> <p>In addition, we always seek perspectives from clinical experts on specific clinical questions and have them involved with peer review.</p>

Comment	Response
	<ul style="list-style-type: none"> • Headaches that present in different locations have different causes. These locations correspond to different acupuncture channels, which correspond to different organs, and therefore different treatments. Examples: <ul style="list-style-type: none"> ○ One-sided, lateral, sharp headaches are associated with the Gall Bladder channel and with the emotion of anger or frustration. ○ Whole-head, dull headaches can be signs of overwork or overly salty diets. ○ Sharp, forehead headaches can be caused by long-term overeating. ○ Chronic occipital headaches and stiff neck can arise from repeated cold infections. ○ Pain behind the eyes – a frequent location for migraines – is associated with either a blood deficiency or excessive stress. An acupuncturist diagnoses the different causes and treats causes in this pain location with different treatments. • Headaches with differing types of pain are treated differently. Chronic, dull headaches are a sign of deficiency. Throbbing headaches reflect excess. A pulling sensation can be a sign of impending stroke. Stabbing pain in a fixed location usually reflects a problem with arterial blood flow and is excess. Treating a deficient headache with a treatment associated with an excess condition will worsen it; the opposite is also true. • Headaches that worsen with activity are due to deficiency; those that improve with light exercise are excess. Those that improve with rest and lying down are deficient; those that worsen with lying down are excess. If pressure at the site of pain lessens the pain, the headache is deficient; conversely if pressure worsens the pain, the headache is excess. <p>Traditional Chinese Medicine recognizes at least seventeen different patterns of headache. [<i>Maciocia</i>]. A widely used reference work lists 75 acupuncture points applicable to various types of headaches. [<i>Deadman and Al-Khafaji</i>]</p> <p>Acupuncture, as practiced, applies the wide diagnoses and specific point prescriptions leading to effective treatment, even beyond what has been discovered by RCTs.</p> <p>Centuries of evidence exists, serving as the foundation of eastern medical theories to diagnose and treat chronic migraine and tension-type headaches. The historical evidentiary record supports the effectiveness of acupuncture in treating these headaches. Additionally, western and eastern medical literature has begun to acknowledge similarities between the two systems. For example, Daniel Keown (a physician in England) points out the common views</p>

Comment		Response
	<p>on some headaches and other maladies in his book. Giovanni Maciocia includes a description of western differential diagnosis of headaches, including inflammatory and non-inflammatory (vascular, neoplastic and hypertensive) intracranial types, cranial and extra-cranial types. Will Maclean's chapters are arranged by western medicine terms, with corresponding eastern medicine patterns describing diagnosis and treatment.</p> <p>Acupuncture, as practiced, provides individualized treatments tailored to a wide range of patterns and locations. This process does not "fit" the criteria for RCT selection, so its results are invisible to policy makers. Therefore, it is appropriate to consider evidence such as my clinical experience and evidence that WAEMA submitted, in addition to evidence from randomized controlled trials.</p> <p>REFERENCES</p> <p>Deadman, Peter and Al-Khafaji, Mazin, A Manual of Acupuncture, Journal of Chinese Medicine Publications, England. 1998.</p> <p>Keown, Daniel, The Spark in the Machine, Singing Dragon, London, 2014.</p> <p>Maciocia, Giovanni, The Practice of Chinese Medicine, Churchill Livingstone, New York. 1994. Chapter One.</p> <p>Maclean, William and Lyttleton, Jane, Clinical Handbook of Internal Medicine: The Treatment of Disease with Traditional Chinese Medicine, Volumes 1 and 2. University of Western Sydney Manchester, Australia. Volume 1, 1998; Volume 2, 2002</p>	
Commenter: Lori Field, NCCAOM® certified acupuncturist, Abundant Life Acupuncture		
Specific comments		
Main body of Comments reproduced	I support the use of acupuncture for migraines. Please read attached document [reattached Dr. Jian Feng Yang's letter – see above).	Thank you.
Commenter: Megan Kingsley Gale (provider and patient)		
Specific comments		
Main body of Comments reproduced	<p>To whom it may concern at the Washington Health Care Authority's Health Technology Assessment Clinical Committee, Regarding re-review of "acupuncture for chronic migraine". I received a notice that you are doing a new review for this topic.[https://weama.info/10792771]</p> <p>What information are you looking for? Personal comments from those of us with chronic migraines? Or research papers on the topic?</p>	Thank you for your comments.

Comment	Response
	<p>Personal Comment/Recommendation</p> <p>As someone who has had the following types of chronic migraines since a teenager (currently I am age 42): classic migraine with visual disturbances, tension-type migraine, menstrual-related migraine, tension headaches, and some cluster-type headaches. Treatment from licensed acupuncturist(s) has made a great improvement in function and migraine and headache relief when I receive the following treatment several times/month:</p> <ul style="list-style-type: none"> • Daily Chinese herbal medicine formula individualized for my condition(s), prescribed by a licensed acupuncturist board certified in Chinese herbal medicine (this is the Diplomate in Oriental Medicine or the Diplomate in Chinese Herbology from NCCAOM) • Acupuncture tx several times/month to include manual acupuncture, cupping, tuina/bodywork, and practicing tai chi <p>The above treatment from an LAc in combination with 2x/monthly chiropractic and medical massage therapy treatments improved my migraines and headaches frequency and duration from daily and low function in my late teens down to 0-2 low function (migraine and headache) days per month. This was a huge relief and why I kept up treatments for years. I was able to have symptoms managed to this low level (just a few days of low function per month) for about 20 years. It is only this past year, during the pandemic when I haven't had access to acupuncture due to lack of childcare to attend appointments or lack of access to providers (due to local shutdowns, etc, in my area, all pandemic-related). Without access to massage, chiropractic, and acupuncture, my migraines and headaches eventually climbed to affecting daily function most days of the month by summer 2020. In summer 2020 I was able to access support to modify my daily CHM formula and have been down to under 15 days of low function due to migraines (vision problems—can't see to drive or use a screen and pain, light sensitivity, etc) with the updated CHM formula. However, I am really looking forward to eventually getting back to being able to access a selected team that includes: a licensed acupuncturist, a chiropractor, and a massage therapist so I can get back down to my previous good management of 2 days or less of low function due to migraines per month.</p> <p>No access or not enough access to treatment from a licensed acupuncturist means my function is low and I am unable to work because of the intensity and frequency of the migraines (can't drive or work on or near a screen while the classic migraines are active; besides the pain itself).</p>

Comment		Response
	<p>I strongly support insurance and other reimbursement coverage of treatment by an NCCAOM board certified licensed acupuncturist for all types of migraines and headaches.</p> <p>If you are interested in some citations of research, please respond with a note to tell me of your interest.</p>	
Commenter: Rebecca Kitzerow, LAc, All Ways Well, LLC (provider)		
Specific comments		
Main body of Comments reproduced	<p>As an acupuncturist with over 15 years of experience, I want to lend my support for the review of Acupuncture for chronic type migraine and tension headaches. I see many patients for whom Acupuncture is an essential part of their care plan to manage these issues, cases where medications fail to provide enough relief for them to work without interruption and have the quality of life that they desire. Some of them do use botox as well, others find it ineffective or not worth the risk of paralysis.</p> <p>Considering the inexpensive, low to no side effect profile and success of Acupuncture treatment in these cases, I am happy to hear that it is being re-reviewed for consideration in these cases and I want to strongly lend my support for it being covered by insurance and considered a reasonable standard of care.</p> <p>WEAMA has compiled compelling research to support the argument for covering Acupuncture in these cases and I appreciate your office taking the time to re-review them and this issue.</p>	<p>Thank you for your comments.</p> <p>In addition to our usual systematic search, will review the WEAMA site to make sure we have identified all relevant publications.</p>
Commenter: Melissa Kohler, ND, LAc , Natural Health Clinic of Olympia (provider)		
Specific comments		
Main body of Comments reproduced	<p>Hello, I do acupuncture on my patients for headaches and migraines since 16 years. I do see improvement in patient's head pain with acupuncture for prevention and acute care.</p>	<p>Thank you for your comments.</p>
Commenter: Greg Lewerenz, DAHM, EAMP, C. SMA, CMTPT, LMT, RYT, Foster Wellness (provider)		
Specific comments		
Main body of Comments reproduced	<p>I wanted to provide my official support for continuing to allow acupuncture to be used as a treatment modality for patients with headaches, including those with chronic migraines. My patients have, anecdotally, found consistent relief from their discomfort through ongoing acupuncture treatments.</p>	<p>Thank you for your comments.</p>

Comment		Response
Commenter: Eugene Lee Mahoney, EAMP, Lac Aermid Acupuncture PLLC (provider)		
Specific comments		
Main body of Comments reproduced	I am understanding that the coverage of those with chronic migraines or tension-type headaches is under question? I have treated many patients and continue to, successfully who have suffered from these things all their lives. Most of my patients who suffer from these are predominantly women. They have only been able to find relief after seeking acupuncture care. Some are better with a few treatments some require occasional follow ups but overall my patients (and I know this to be true for other practitioners) have had a significant improvement in quality of life after seeking care from an acupuncture. This would seriously impede those who rely on health insurance for access to health care but will not impede the few patients who can afford to pay out of pocket. Making this not only a quality of life disparity that affects predominantly women but poorer women especially. Please reconsider covering acupuncture for migraines and tension headaches.	Thank you for your comments.
Commenter: Roberto Masferrer, Kumo Acupuncture and Oriental Medicine (provider)		
Specific comments		
Main body of Comments reproduced	To whom it may concern: Please support the use of acupuncture in the treatment of migraines and tension headaches. I am an acupuncturist in Walla Walla, and I see many people for migraine and tension headache relief. In my experience it is a very effective treatment. Regular treatments can reduce the intensity, duration and frequency of migraines. The treatments are useful to address an ongoing migraine or to prevent migraines from occurring.	Thank you for your comments.
Commenter: Nikki Medghalchy, DAOM, L.Ac, Advanced Acupuncture and Chinese Herbal Clinic (provider)		
Specific comments		
Main body of Comments reproduced	This is Dr. Nikki Medghalchy from Advanced Acupuncture and Chinese Herbal Clinic from Vancouver, WA, Website address www.aachc.com . Would like to share my 22+ years of experience treating chronic migraines. It has been very successful and effective of treatment modalities for this symptoms. For further questions please do not hesitate to contact my office.	Thank you for your comments.
Commenter: Yvonne Pastika, LAc (provider)		
Specific comments		
Main body of Comments reproduced	I am an Acupuncturist in Seattle/ Renton area of Washington. I treat patients daily with Acupuncture to relieve headache/ migraine symptoms. Because some people are sensitive to NSAIDS, and prescription medication, Acupuncture is one of	Thank you for your comments.

Comment		Response
	the best modalities for treatment of headache, without having to use prescription or over the counter medications. Many studies have validated that Acupuncture brings rapid relief for patients that suffer from migraines and tension headaches, by clearing the head and reducing tension.	
Commenter: Trevor Seigny, LAc, MSAOM, Sound Medicine, Seattle Acupuncture Associates (provider)		
Specific comments		
Main body of Comments reproduced	<p>For over 16 years I have treated patients who suffered from chronic migraine headaches. It has been typical to see a reduction of both intensity and frequency of symptoms over time and in some cases remission has been achieved. Patients who had stopped responding to medications for their migraines were often still able to improve under acupuncture treatment. Several patients were able to discontinue migraine medications (under the supervision of the prescribing authority), without losing the improvements achieved through acupuncture.</p> <p>In addition, treatments received during migraine episodes or during the prodrome stage are typically effective at reducing or alleviating symptoms and may accelerate the course of the episode (I have seen patients who were accustomed to being incapacitated for several days with their headaches return to work in a day or less when treatment was timed in this manner).</p> <p>Thank you for examining this very effective medical application. Many patients have profoundly improved their lives through this care, while many more who suffer from chronic migraine but have not yet sought acupuncture care are losing out on productivity and enjoyment of life.</p>	Thank you for your comments.
Commenter: Jon Silliman (provider)		
Specific comments		
Main body of Comments reproduced	<p>I would like to thank you for your review of acupuncture for chronic migraine and tension type headaches. It has become clear that not only do many acupuncture practitioners have personal experience with offering successful treatments to their patients for migraines and headaches in general but there is also substantial evidence and institutional acceptance of this treatment to further support our experiences.</p> <p>There are many strong research studies that support the use of acupuncture for migraines for review, and we also want with this letter to punctuate the current level of support within the healthcare system for this treatment. The Veterans Administration (VA) has conducted their own literature reviews and research demonstrating that acupuncture for</p>	<p>Thank you for your comments.</p> <p>All publications cited as evidence will be considered for inclusion based on the inclusion/exclusion criteria for the evidence report.</p>

Comment	Response
	<p>migraines and headaches have evidence of positive effects, substantial body of evidence resulting in high confidence in the treatment. (1)</p> <p>The National Center for Complimentary and Integrative Health also supports acupuncture for chronic headaches: “Results from a number of studies suggest that acupuncture may help ease types of pain that are often chronic such as low-back pain, neck pain, and osteoarthritis/knee pain. It also may help reduce the frequency of tension headaches and prevent migraine headaches. Therefore, acupuncture appears to be a reasonable option for people with chronic pain to consider.” (2)</p> <p>The American Migraine foundation also recommends acupuncture treatment for Migraines: <i>“Based on a recent systematic review of 22 clinical trials involving 4985 people, there is evidence that acupuncture reduces the frequency of headache in individuals with migraine, and that the effect may be similar to that observed with preventive medications. The frequency of headache is dropped by 50% or more in up to 59% of individuals receiving acupuncture and this effect can persist for more than 6 months.”</i> (3)</p> <p>And most recently we have this research that just came out this year, the ACUMIGRAN study; this study compared acupuncture treatments with pharmacological treatments for migraine, comparing headache frequency at the end of treatment; <i>“Data suggested that acupuncture could be adopted as migraine prophylaxis and seem to be slightly superior to pharmacological treatment in compliance and rate of adverse events.”</i> (4)</p> <p>Evidence continues to grow in support of acupuncture for migraines and tension-type headaches. Not only is the treatment effective but it is cost effective and safe, short term and long term. All medical professionals take an oath before they are allowed to practice stating their commitment to do no harm. Acupuncture as a form of medicine offers a safe and reliable approach. From an overview of systematic reviews on migraines it was <i>“concluded that acupuncture treatments had fewer adverse events than medication, which indicated that acupuncture was a safe therapy for migraine.”</i> (5)</p> <p>The Health Care Authority (HCA) has supported botulism toxin (Botox) treatments for headaches. While these studies show few adverse events directly after the treatment, some long-</p>

Comment		Response
	<p>term consequences come later when the toxin begins to spread throughout the body.</p> <p><i>“Onabotulinumtoxin A injection is given as a number of tiny injections intended to affect only the specific area where injected. However, it is possible that the medication may spread from the area of injection and affect muscles in other areas of the body. If the muscles that control breathing and swallowing are affected, you may develop severe problems breathing or swallowing that may last for several months and may cause death. If you have difficulty swallowing, you may need to be fed through a feeding tube to avoid getting food or drink into your lungs.” (6)</i></p> <p>The treatment uses a neurotoxin which can lead to nerve damage (7) and weakness of the neck muscles among other complications. Acupuncturists have reported cases of patients coming in with this issue and seeking acupuncture to not only help with the migraines, but to also help recover from the Botox treatments’ long-term effects. Not only does acupuncture help directly with the relief of migraines but it can also further complement Botox treatments by minimizing the side effects – it is a primary treatment as well as a complementary treatment.</p> <p>Acupuncture as a treatment for migraines and tension type headaches has a growing body of evidence demonstrating efficacy as well as safety short term and long term. The entire medical community and healthcare system are always in search of the best solutions and treatment venues for whole patient care with lasting effects. Research and experience alike have shown that not only is acupuncture safe and effective for treatment of chronic migraines and tension type headaches, but it also cost effective. (8)</p>	
Commenter: Laurie Solomon, LAc (provider)		
Specific comments		
Main body of Comments reproduced	<p>I have been licensed and actively practicing acupuncture in the states of Washington and Oregon since 2001. I have treated patients with chronic migraines both as a chief complaint and a concomitant condition dozens of times.</p> <p>When Migraine is the chief complaint, it is usually the case that the patient has been prescribed one or more medications over many years or even decades that has/have usually stopped working. In these cases, I advise to keep treatments weekly or bi-weekly for 3-6 months, depending on the lasting effects that each individual experiences, spacing treatments out to bimonthly then monthly for another 6</p>	Thank you for your comments.

Comment		Response
	<p>months. After a year, the migraines have either completely ceased or have dramatically been reduced in frequency and duration in the vast majority of patients. When these do recur, the previously prescribed pain medications are more effective, and resuming acupuncture for another several months nearly always eliminates the regular occurrence and reduces or entirely eliminates the need for pharmaceutical pain management once again.</p> <p>When Migraine is not the chief complaint, if the treatment lasts over 6 sessions, the patients notice reduction in intensity about half the time, and reduction in frequency a little less than half the time.</p> <p>It is very clear to me over my 20 years of practice, that one of the more obvious conditions that acupuncture is effective in treating is Chronic Migraine.</p> <p>Thank you for your consideration of this acupuncture practitioner's comment. I sincerely hope that acupuncture continues to be considered a medically appropriate treatment for chronic migraine.</p>	
Commenter: Mia Song, EAMP (provider)		
Specific comments		
Main body of Comments reproduced	<p>I have been a practitioner of acupuncture for over 20 years and have successfully treated countless patients who have come in for migraines and chronic tension headaches. Most of these patients were already on medications for migraine and have tried other therapies with some relief but still experiencing migraines and headaches on a consistent basis. We were able to significantly reduce the symptoms and improve the quality of these patients lives. Please support acupuncture for the treatment of migraine and tension headaches. This is much needed safe therapy for these conditions.</p>	Thank you for your comments.
Commenter: Katharine Ting, ND, LAc (provider)		
Specific comments		
Main body of Comments reproduced	<p>I am an acupuncturist and naturopathic physician in the state of Washington. I am writing in support of acupuncture as an effective treatment for chronic migraine and chronic tension-type headache. In my 16 years of experience, I have successfully treated many patients with migraine headache and tension headache using acupuncture alone.</p>	Thank you for your comments.

Comment		Response
Commenter: Angie Yin, LAc (provider)		
Specific comments		
Main body of Comments reproduced	Please consider acupuncture to treat migraines and tension-type headaches. Throughout my practice for the past decade, I have successfully treated many migraine and related headache conditions using ACUPUNCTURE method. Many of my patients swear by it that by far acupuncture is the BEST treatment they have got results from. Real cases, real people, real benefits. Please re-consider acupuncture to treat Migraines and tension headaches!	Thank you for your comments.
Commenter: Anna (provider)		
Specific comments		
Main body of Comments reproduced	<p>I am an acupuncturist in Washington state for the past four years. In the course of my clinical practice I have seen dozens of patients successfully respond to acupuncture for the treatment of migraines and other headaches. In some cases, the patients had not only suffered from severe, frequent migraines for years but had also exhausted conventional treatment strategies to no avail. Within the course of acupuncture, patients notice a decrease in the frequency, duration and severity of migraines and have been very pleased with the results. Often, these improvements can last months between treatments.</p> <p>Please ensure that insurance companies continue to allow acupuncture to treat migraines so we can continue to support and heal the people of Washington!</p>	Thank you for your comments.
Commenter: Nick Spurlock, Bastyr University		
Specific comments		
Main body of Comments reproduced	Acupuncture is effective for all types of headaches, including migraines and chronic tension. I have watched it work many times and it provides much needed relief to those afflicted. Acupuncture is a minimally invasive medical procedure that activates the biochemical reactions of wellness to treat disease. It is a safe and cost-effective treatment option for those who suffer from migraines and chronic tension headaches. Patients deserve this treatment option.	Thank you for your comments.

Table 2. Responses to comments on draft key questions

Comment		Response
Commenter: Natalie Pascale Boisseau, LAc, EAMP, Board member, WAEMA, Innate Radiance Clinic		
Specific comments		
Main body of Comments reproduced	<p>On behalf of the Washington Acupuncture and Eastern medicine association (WAEMA), I would like to submit these additional comments in response to the new comment period that you open. Due to an urgent matter this week - I was not able to email by yesterday, a response that we believe we have already provided. I am submitting anyway, for the sake of good additional communication. Here are the responses:</p> <ul style="list-style-type: none"> • Have appropriate populations or indications been identified? Response: The appropriate population and indication is that everyone who gets migraines-headaches- they are usually adults and the research submitted addresses that. • Are appropriate comparators identified? Response: The reviews do not compare acupuncture to other therapies. They were a stand alone review for acupuncture efficacy. The previous review compared Botox to acupuncture, but not this one. • Have appropriate patient-oriented outcome measures been included? Response: Patient outcomes have been included. • What special policy or clinical considerations could affect the review? Response: We do not know of any special policies or clinical considerations that could affect the review. • We believe all questions have been addressed. 	<p>Thank you for your comments.</p> <p>Regarding appropriate comparators, acupuncture will be compared with standard/usual alternative treatment(s), sham, placebo, waitlist or no treatment. Unlike the prior report that looked at various treatment options for chronic migraine and headache, this report is focused solely on acupuncture as the intervention.</p>

APPENDIX A: Topic Nomination Comments Received



September 1, 2021

Health Care Authority-Health Technology Assessment Program

Submitted by email: shtap@hca.wa.gov

RE: Comments supporting acupuncture for migraine and tension-type headache re-review

To Whom It May Concern:

The National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM[®]), commends the Health Technology Assessment (HTA) program for reconsidering acupuncture as a viable solution for the treatment of migraine and chronic tension-type headaches. About our organization, NCCAOM is the only national organization that validates entry-level competency in the practice of acupuncture and herbal medicine through professional certification across the nation.

There exists substantial evidence in both clinical outcomes as well as in-depth research for the continued use of acupuncture for chronic migraine and tension-type headaches. Among these reasons, are

- Acupuncture is safe when performed by licensed practitioners
- Acupuncture is effective as compared to other conventional interventions
- Acupuncture is cost effective and reduces incidence of more expensive procedures

Migraine and severe headaches are estimated to affect approximately 15.9% of Americans annually. In addition to lost productivity, severe migraine headaches can often lead to more costly interventions including ED and office visits¹. Acupuncture has strong clinical evidence for its use in treating migraine and tension headaches. In fact, Acupuncturists regularly treat these types of ongoing pain conditions as acupuncture has become a first-line treatment recommendation for pain. Headaches of multiple origins, acute and chronic, are one of the most commonly referred conditions to clinicians across the country.

¹ Burch, R., Rizzoli, P. and Loder, E. (2021), The prevalence and impact of migraine and severe headache in the United States: Updated age, sex, and socioeconomic-specific estimates from government health surveys. Headache: The Journal of Head and Face Pain, 61: 60-68. <https://doi.org/10.1111/head.14024>

Clinically significant research reveals acupuncture maintains a body of evidence to support its use for these kinds of conditions.

Amongst several high-quality trials involving thousands of participants, the 2009 Cochrane review by Linde and colleagues² found that there is consistent evidence that acupuncture is beneficial in the treatment of acute migraine attacks and that the available studies suggest that acupuncture is at least as effective as prophylactic drug treatment and has fewer adverse effects.

Furthermore, acupuncture has been reviewed as compared to other methods of treatment regarding chronic headaches, such as botulinum toxin type A injections, or Botox. A recent review showed significant reduction of pain severity in control groups receiving both types of interventions. However, the research notes increased effectiveness with fewer adverse effects in the Acupuncture groups³ as compared to botulinum toxin type A.

In addition to clinical efficacy, acupuncture remains a safe procedure when performed by certified and trained providers. Multiple studies show low incidence rates of adverse effects from acupuncture. Additionally, the high standards set by the NCCAOM through its testing and certification process to ensure entry level qualifications, reinforces this fact. NCCAOM National Board-Certification adds to public safety and awareness of preferred providers as well as keeping high standards for clinical outcomes.

In conclusion, the NCCAOM, once again, commends the HTA for its consideration and review of acupuncture for the treatment of migraine and tension-type headaches.

Sincerely,



Iman Majd, MD, MS, FAMP/LAc., Dipl. ABFM, ABoIM, Dipl. Ac., (NCCAOM®), DABMA, ABIHM
Chair, NCCAOM Board of Commissioners

² Linde K, Allais G, Brinkhaus B, et al. Acupuncture for migraine prophylaxis. Cochrane Database Syst Rev 2009;(1):CD001218.

³ Naderinabi, B., Saberi, A., Hashemi, M., Haghighi, M., Biazar, G., Abolhasan Gharehdaghi, F., Sedighinejad, A., & Chavoshi, T. (2017). Acupuncture and botulinum toxin A injection in the treatment of chronic migraine: A randomized controlled study. *Caspian journal of internal medicine*, 8(3), 196–204. <https://doi.org/10.22088/cjim.8.3.196>

National Certification Commission for Acupuncture and Oriental Medicine
2001 K St NW, 3rd Floor, Washington DC 20036 / (888) 381-1140 / info@thenccaom.org / www.nccaom.org

From: Steve Sebers <ssebers@chpgroup.com>
Sent: Tuesday, August 31, 2021 9:57 AM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture treatments for chronic migraine and chronic tension type headaches comments
Attachments: 8.2021 WA HTA acupuncture for headaches CHP Comments.pdf

External Email

Good Morning,

I have also included this as an attached PDF if that is helpful for you.

RE: Acupuncture for chronic migraine and chronic tension-type headache selected for re-review by HTA program

The CHP Group, an Oregon based preferred provider organization has been providing a network of chiropractic and naturopathic physicians, acupuncturists, and massage therapists to various insurers in the Pacific Northwest for many years in support of evidence-based integrative healthcare services.

Please consider the following an evidence-based summary in support of coverage for acupuncture treatment for migraine headaches and chronic tension-type headaches (TTH).

PRIMARY HEADACHE

Primary headache (TTH, migraine, and chronic headache), is a key contributor to the development of chronic pain (#3 leading cause behind low back pain and arthritis).[1] Based on the most recent biomedical treatment guidelines[2, 3] three levels of care are recommended when managing primary headache: 1) patient education (including lifestyle modification), 2) acute treatment, and 3) prophylactic treatment. Although treatment strategies differ based on headache classification and individual patient presentation, the goal is to recognize the most appropriate *combination* of therapies that can provide meaningful resolution of symptoms.

Systematic reviews conducted by the Cochrane collaboration in 2016, conclude that acupuncture is an effective treatment option for the management of primary headache. In support of these findings, a recent overview of the most current and "informative" systematic reviews concluded that, "*the current state of the literature is that there is a sufficient number of published trials...[which] provide ample evidence that acupuncture is effective as an adjunct to usual care in the management or prevention of common headache disorders...*"[4] These findings are further strengthened by data suggesting that adjunctive acupuncture is a cost-effective option for the management of both TTH and migraine headache.[5, 6] Not surprisingly, both the British and Scottish National guidelines suggest acupuncture as an adjunctive therapy for the management of primary headache.[7, 8]

The accumulated evidence suggests that acupuncture is an effective health care option for the treatment of TTH, migraine, and chronic headache. Based on the literature, the following conclusions can be drawn:

Tension Type Headache

The evidence supports the benefit of acupuncture for the treatment of Tension-Type Headache (TTH).

- The most recent (comprehensive) systematic review concludes that acupuncture is a beneficial treatment option.[9]

The evidence supports the cost-effectiveness of acupuncture for the treatment of TTH.

- A large-scale (N=3,182) pragmatic RCT suggests acupuncture adjunctive to other therapies is cost-effective.[5] [N.B. Analysis was of primary headache participants: TTH 46%; Migraine 54%]

Migraine Headache

The evidence supports the benefit of acupuncture for the treatment of migraine headache.

- The most recent (comprehensive) systematic review concludes that acupuncture is a beneficial treatment option.[10]
 - A newly published RCT (n=249) supports the review's main findings.[11]

The evidence supports the cost-effectiveness of acupuncture for the treatment of migraine.

- Two larger-scale (N=3,182; N=401) pragmatic RCTs suggest acupuncture adjunctive to other therapies is cost-effective.*[5, 6] [*Analysis was of primary headache participants: Migraine 54%; TTH 46%]

Chronic Headache

The evidence supports the benefit of acupuncture for the treatment of chronic headache.

- The most recent systematic review concludes that acupuncture is a beneficial treatment option.[12]

Currently many insurers, including commercial, Medicare Advantage, and Medicaid programs provide coverage for acupuncture services for these conditions based on this and other evidence. The inclusion of non-pharmacologic modalities such as acupuncture for migraine headaches and TTH is essential as a first line and adjunctive evidence-based treatment option to improve patient outcomes as well as address the Opioid crisis which remains a public health emergency.

Let me know if you have any questions and thank you for your consideration of this evidence-based review.

References

1. Gaskin DJ, Richard P. The economic costs of pain in the United States. *J Pain*. 2012;13(8):715-24.
2. Beithon J GM, Johnson K, Kildahl P, Krenik J, Liebow M, Linbo L, Myers C, Peterson S, Schmidt J, Swanson J. Diagnosis and treatment of headache. 2013:84.
3. Becker WJ, Findlay T, Moga C, Scott NA, Harstall C, Taenzer P. Guideline for primary care management of headache in adults. *Can Fam Physician*. 2015;61(8):670-9.
4. Coeytaux RR, Befus D. Role of Acupuncture in the Treatment or Prevention of Migraine, Tension-Type Headache, or Chronic Headache Disorders. *Headache*. 2016;56(7):1238-40.
5. Witt CM, Reinhold T, Jena S, Brinkhaus B, Willich SN. Cost-effectiveness of acupuncture treatment in patients with headache. *Cephalalgia*. 2008;28(4):334-45.
6. Wonderling D, Vickers AJ, Grieve R, McCarney R. Cost effectiveness analysis of a randomised trial of acupuncture for chronic headache in primary care. *BMJ*. 2004;328(7442):747.
7. Scottish Intercollegiate Guidelines Network 2008;Pages<http://www.sign.ac.uk/guidelines/fulltext/107/index.html>2012.
8. MacGregor EA ST, Davies PTG. Guidelines for All Healthcare Professionals in the Diagnosis and Management of Migraine, Tension-Type, Cluster and Medication-Overuse Headache. In: Writing Committee: EA MacGregor TS, PTG Davies, ed. 3rd edition (1st revision) ed. Online: British Association for the Study of Headache; 2010.
9. Linde K, Allais G, Brinkhaus B, Fei Y, Mehning M, Shin BC, et al. Acupuncture for the prevention of tension-type headache. *Cochrane Database Syst Rev*. 2016;4:CD007587.
10. Linde K, Allais G, Brinkhaus B, Fei Y, Mehning M, Vertosick EA, et al. Acupuncture for the prevention of episodic migraine. *Cochrane Database Syst Rev*. 2016(6):CD001218.
11. Zhao L, Chen J, Li Y, Sun X, Chang X, Zheng H, et al. The Long-term Effect of Acupuncture for Migraine Prophylaxis: A Randomized Clinical Trial. *JAMA Intern Med*. 2017;177(4):508-15.
12. Sun Y, Gan TJ. Acupuncture for the management of chronic headache: a systematic review. *Curr Res Anesth Analg*. 2008;107(6 PB - International):2038-47.

Thank you.

Sincerely,
Steve

Steve Sebers, DC, FIANM | Chief Clinical Officer
The CHP Group | Smart Solutions. Healthy Results.



ssebers@chpgroup.com | 503-203-8333 x114 | www.chpgroup.com
6600 SW 105th Ave Ste 115 | Beaverton, OR 97008



August 24, 2021

Attn: Health Technology Assessment (HTA) program

Re: Acupuncture for chronic migraine and chronic tension-type headache re-review comments

Submit all comments to: shtap@hca.wa.gov

To Whom It May Concern:

The Washington Acupuncture and Eastern Medicine Association (WAEMA) would like to thank you for your review of acupuncture for chronic migraine and tension type headaches. After discussion with our community, it became clear that not only do many acupuncture practitioners have personal experience with offering successful treatments to their patients for migraines and headaches in general but there is also substantial evidence and institutional acceptance of this treatment to further support of our experiences.

We have already submitted many strong research studies that support the use of acupuncture for migraines for review, and we also want with this letter to punctuate the current level of support within the healthcare system for this treatment. The Veterans Administration (VA) has conducted their own literature reviews and research demonstrating that acupuncture for migraines and headaches have evidence of positive effects, substantial body of evidence resulting in high confidence in the treatment.⁽¹⁾ The National Center for Complimentary and Integrative Health also supports acupuncture for chronic headaches:

"Results from a number of studies suggest that acupuncture may help ease types of pain that are often chronic such as low-back pain, neck pain, and osteoarthritis/knee pain. It also may help reduce the frequency of tension headaches and prevent migraine headaches. Therefore, acupuncture appears to be a reasonable option for people with chronic pain to consider."⁽²⁾

The American Migraine foundation also recommends acupuncture treatment for Migraines:

"Based on a recent systematic review of 22 clinical trials involving 4985 people, there is evidence that acupuncture reduces the frequency of headache in individuals with migraine, and that the effect may be similar to that observed with preventive medications. The frequency of headache is dropped by 50% or more in up to 59% of individuals receiving acupuncture and this effect can persist for more than 6 months."⁽³⁾

And most recently we have this research that just came out this year, the ACUMIGRAN study; this study compared acupuncture treatments with pharmacological treatments for migraine, comparing headache frequency at the end of treatment;

“Data suggested that acupuncture could be adopted as migraine prophylaxis and seem to be slightly superior to pharmacological treatment in compliance and rate of adverse events.”⁽⁴⁾

Evidence continues to grow in support of acupuncture for migraines and tension-type headaches. Not only is the treatment effective but it is cost effective and safe, short term and long term. All medical professionals take an oath before they are allowed to practice stating their commitment to do no harm. Acupuncture as a form of medicine offers a safe and reliable approach. From an overview of systematic reviews on migraines it was “concluded that acupuncture treatments had fewer adverse events than medication, which indicated that acupuncture was a safe therapy for migraine.”⁽⁵⁾

The Health Care Authority (HCA) has supported botulism toxin (Botox) treatments for headaches. While these studies show few adverse events directly after the treatment, some long-term consequences come later when the toxin begins to spread throughout the body.

“Onabotulinumtoxin A injection is given as a number of tiny injections intended to affect only the specific area where injected. However, it is possible that the medication may spread from the area of injection and affect muscles in other areas of the body. If the muscles that control breathing and swallowing are affected, you may develop severe problems breathing or swallowing that may last for several months and may cause death. If you have difficulty swallowing, you may need to be fed through a feeding tube to avoid getting food or drink into your lungs.”⁽⁶⁾

The treatment uses a neurotoxin which can lead to nerve damage⁽⁷⁾ and weakness of the neck muscles among other complications. Acupuncturists have reported cases of patients coming in with this issue and seeking acupuncture to not only help with the migraines, but to also help recover from the Botox treatments’ long-term effects. Not only does acupuncture help directly with the relief of migraines but it can also further complement Botox treatments by minimizing the side effects – it is a primary treatment as well as a complementary treatment.

Acupuncture as a treatment for migraines and tension type headaches has a growing body of evidence demonstrating efficacy as well as safety short term and long term. The entire medical community and healthcare system are always in search of the best solutions and treatment venues for whole patient care with lasting effects. Research and experience alike have shown that not only is acupuncture safe and effective for treatment of chronic migraines and tension type headaches, but it also cost effective.⁽⁸⁾

Thank you for your time and consideration.



Dr. JianFeng Yang

WAEMA Board President

On behalf of The Washington Acupuncture and Eastern Medicine Board of Directors

Notes:

1. https://www.hsrd.research.va.gov/publications/management_briefs/default.cfm?ManagementBriefsMenu=eBrief-no78
2. <https://www.nccih.nih.gov/health/acupuncture-in-depth?nav=govd>
3. <https://americanmigrainefoundation.org/resource-library/understanding-migraineacupuncture-and-migraine-finding-a-combination-that-sticks/>
4. <https://www.frontiersin.org/articles/10.3389/fneur.2020.570335/full>
5. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7125485/>
6. <https://medlineplus.gov/druginfo/meds/a608013.html>
7. <https://www.sciencedaily.com/releases/2015/04/150416094051.htm>
8. <https://www.sciencedirect.com/science/article/abs/pii/S0965229912000805>

From: Lisa Callan <lisa.w.callan@gmail.com>
Sent: Saturday, August 28, 2021 7:27 PM
To: HCA ST Health Tech Assessment Prog
Subject: in support of: acupuncture for headaches and migraines

External Email

I am writing asking for consideration to cover the use acupuncture for hormonal, tension and migraine headaches. I have had great success minimizing the degree, number, and type of headaches I have experienced throughout different periods of my life and health circumstances.

If you have questions or need further information please let me know.

Lisa Callan
425.260.4878

From: Natalie Henton <natalie.rae.henton@gmail.com>
Sent: Friday, August 27, 2021 2:56 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for help with migraines

External Email

Hello! I currently receive acupuncture treatment at Alpine Acupuncture in Issaquah, WA and heard that comments were welcomed from people whom treatment has helped for headaches and migraines. I am one of those people! Acupuncture treatment has given me immediate relief on several occasions, as well as continued healing even days after.

Thank you!
Warmly,
Natalie Henton

Sent from my iPhone

From: brijohns82 <brijohns82@gmail.com>
Sent: Sunday, August 29, 2021 7:41 AM
To: HCA ST Health Tech Assessment Prog
Subject: Headaches & acupuncture

External Email

Recently I've been having daily headaches due to tension in my neck and have been getting acupuncture treatments for it. It is pretty amazing how much relief I get from just one treatment. My headaches go away almost instantly, and I am so grateful to be able to have acupuncture as an option for relief.
Bridget Johns

From: Mr. & Mrs. Gomez <joblyjook@gmail.com>
Sent: Friday, August 27, 2021 1:42 PM
To: HCA ST Health Tech Assessment Prog
Subject: Please keep insurance authorizations for migraines and headaches

External Email

To the Health Care Authority-Health Technology Assessment Program,

I use acupuncture for chronic migraine and chronic tension-type headaches. The treatments I've received have reduced my use of prescription medications and helped me to take no time off work. It's been a game changer in my health care and I need it be covered by my insurance to live a healthier life.

Thank you for taking the time to read my comments.

*Sincerely,
Joy Lewis*

From: Lori Pitman <irolann@gmail.com>
Sent: Friday, August 27, 2021 2:30 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for migraines

External Email

Hi,

I have been treated by acupuncture to cure many types of headaches including tension and migraine. When traditional medicine does not work or if medication I have been prescribed gives me terrible side effects, I feel in despair of not being able to live a healthy life. However, I always know I can count on my acupuncturist to help me. Lately, I have been going to him for help with headaches post surgery. He also got me through very tough times while I was recovering from a severe concussion. He was the Only doctor that was able to help me!!!

Please understand how it is important to have this type of treatment covered by insurance. There are many people like me that need acupuncture to be able to lead a productive life!

Lori Pitman
425-761-2032

--
~Lori

From: Deric Villanueva <ddvill@gmail.com>
Sent: Friday, August 27, 2021 2:06 PM
To: HCA ST Health Tech Assessment Prog
Subject: Re: commentary on Acupuncture as treatment for Migraine headaches

External Email

Greetings

I was under the care of Carleton Magus acupuncture and herbal medicine for migraine, insomnia and chronic pain in my shoulder and neck. The treatments lasted until my employer's health insurance no longer covered acupuncture.

Sorry sent too early

Before treatments I experienced migraine headaches once or twice a month. After the 1st month of treatment and after subsequent months I experienced a reprieve from migraines and had so few recurrences as to consider the treatment successful. Since I have stopped acupuncture I am now experiencing regular migraine headaches for which I am treating with western pharmaceuticals.

Moreover my insomnia has returned and I live with fewer than 24 hours of sleep a week. I hope to resume acupuncture again when my insurance allows.

thank you

On Fri, Aug 27, 2021 at 1:58 PM Deric Villanueva <ddvill@gmail.com> wrote:

Greetings

I was under the care of Carleton Magus acupuncture and herbal medicine for migraine, insomnia and chronic pain in my shoulder and neck. The treatments lasted until my employers health insurance no longer covered acupuncture.

Comments of Curtis Eschels
to the Health Technology Clinical Committee
Review of Chronic migraine, or chronic tension-type headache

Submitted via email only
August 31, 2021

The Health Care Authority requested comments on the effectiveness of acupuncture in treating chronic migraine and tension headaches. I am submitting comments based on my Master's-level acupuncture degree, national certification and nineteen years of practice. I have treated headaches as part of a wide-ranging practice for pain, injuries and diseases.

My experience had a much higher rate of success in relieving headaches than the randomized, controlled trials (RCTs) reported in the formal literature. Although my results are qualitatively more favorable, I did not document my clinical work with case studies or case reports. Nevertheless, comparing these positive clinical, empirical results to controlled trials and systematic reviews will be a constructive addition to your work.

I support the use of systematic reviews and randomized control trials as part of reviewing comparative strategies for pharmaceutical and other medical procedures. I understand that the Board of Directors of the Washington Acupuncture and Eastern Medicine Association submitted evidence for the 2017 review, and it has submitted material this year about newer research.

Certain qualities of RCTs – designed to narrow the study scope to measure the effect of a single variable – make the intricacies of acupuncture treatment invisible to the researchers. Understanding the intricacies explains acupuncture's effectiveness, higher than measured in western trials.

Headache is one of the most common symptoms encountered by health care providers. However, chronic migraine and tension-type headaches have different presentations and different causes. Treatment with Traditional Chinese Medicine recognizes those wide-ranging differences.

- Headaches that present in different locations have different causes. These locations correspond to different acupuncture channels, which correspond to different organs, and therefore different treatments. Examples:
 - One-sided, lateral, sharp headaches are associated with the Gall Bladder channel and with the emotion of anger or frustration.
 - Whole-head, dull headaches can be signs of overwork or overly salty diets.
 - Sharp, forehead headaches can be caused by long-term overeating.
 - Chronic occipital headaches and stiff neck can arise from repeated cold infections.
 - Pain behind the eyes – a frequent location for migraines – is associated with either a blood deficiency or excessive stress. An acupuncturist diagnoses the different causes and treats causes in this pain location with different treatments.

Comments of Curtis Eschels
August 31, 2021

- Headaches with differing types of pain are treated differently. Chronic, dull headaches are a sign of deficiency. Throbbing headaches reflect excess. A pulling sensation can be a sign of impending stroke. Stabbing pain in a fixed location usually reflects a problem with arterial blood flow and is excess. Treating a deficient headache with a treatment associated with an excess condition will worsen it; the opposite is also true.
- Headaches that worsen with activity are due to deficiency; those that improve with light exercise are excess. Those that improve with rest and lying down are deficient; those that worsen with lying down are excess. If pressure at the site of pain lessens the pain, the headache is deficient; conversely if pressure worsens the pain, the headache is excess.

Traditional Chinese Medicine recognizes at least seventeen different patterns of headache. [Maciocia]. A widely used reference work lists 75 acupuncture points applicable to various types of headaches. [Deadman and Al-Khafaji] Acupuncture, as practiced, applies the wide diagnoses and specific point prescriptions leading to effective treatment, even beyond what has been discovered by RCTs.

Centuries of evidence exists, serving as the foundation of eastern medical theories to diagnose and treat chronic migraine and tension-type headaches. The historical evidentiary record supports the effectiveness of acupuncture in treating these headaches. Additionally, western and eastern medical literature has begun to acknowledge similarities between the two systems. For example, Daniel Keown (a physician in England) points out the common views on some headaches and other maladies in his book. Giovanni Maciocia includes a description of western differential diagnosis of headaches, including inflammatory and non-inflammatory (vascular, neoplastic and hypertensive) intracranial types, cranial and extra-cranial types. Will Maclean's chapters are arranged by western medicine terms, with corresponding eastern medicine patterns describing diagnosis and treatment.

Acupuncture, as practiced, provides individualized treatments tailored to a wide range of patterns and locations. This process does not "fit" the criteria for RCT selection, so its results are invisible to policy makers. Therefore, it is appropriate to consider evidence such as my clinical experience and evidence that WAEMA submitted, in addition to evidence from randomized controlled trials.

Curtis Eschels
Retired Acupuncturist (Washington State)
curtiseschels@gmail.com

From: Lori <lori@abundantlifeacupuncture.com>
Sent: Friday, September 3, 2021 8:07 AM
To: HCA ST Health Tech Assessment Prog <SHTAP@HCA.WA.GOV>
Subject: Acupuncture and Migraines

External Email

I support the use of acupuncture for migraines. Please read attached document.
Thanks, Lori Field

Abundant Life Acupuncture
425 443 0831
www.abundantlifeacupuncture.com

From: Megan Kingsley Gale <megankgale@outlook.com>
Sent: Wednesday, August 4, 2021 2:49 PM
To: HCA ST Health Tech Assessment Prog
Cc: Megan Kingsley Gale
Subject: WA HTA review of chronic migraine--a personal comment recommendation

External Email

To whom it may concern at the Washington Health Care Authority's Health Technology Assessment Clinical Committee,
Regarding re-review of "acupuncture for chronic migraine".

I received a notice that you are doing a new review for this topic. [<https://weama.info/10792771>]

What information are you looking for?

Personal comments from those of us with chronic migraines? Or research papers on the topic?

Personal Comment/Recommendation

As someone who has had the following types of chronic migraines since a teenager (currently I am age 42): classic migraine with visual disturbances, tension-type migraine, menstrual-related migraine, tension headaches, and some cluster-type headaches,

Treatment from licensed acupuncturist(s) has made a great improvement in function and migraine and headache relief when I receive the following treatment several times/month:

- Daily Chinese herbal medicine formula individualized for my condition(s), prescribed by a licensed acupuncturist board certified in Chinese herbal medicine (this is [the Diplomate in Oriental Medicine](#) or the Diplomate in Chinese Herbology from NCCAOM)
- Acupuncture tx several times/month to include manual acupuncture, cupping, tuina/bodywork, and practicing tai chi

The above treatment from an LAc in combination with 2x/monthly chiropractic and medical massage therapy treatments improved my migraines and headaches frequency and duration from daily and low function in my late teens down to 0-2 low function (migraine and headache) days per month. This was a huge relief and why I kept up treatments for years. I was able to have symptoms managed to this low level (just a few days of low function per month) for about 20 years. It is only this past year, during the pandemic when I haven't had access to acupuncture due to lack of childcare to attend appointments or lack of access to providers (due to local shutdowns, etc, in my area, all pandemic-related). Without access to massage, chiropractic, and acupuncture, my migraines and headaches eventually climbed to affecting daily function most days of the month by summer 2020. In summer 2020 I was able to access support to modify my daily CHM formula and have been down to under 15 days of low function due to migraines (vision problems—can't see to drive or use a screen and pain, light sensitivity, etc) with the updated CHM formula. However, I am really looking forward to eventually getting back to being able to access a selected team that includes: a licensed acupuncturist, a chiropractor, and a massage therapist so I can get back down to my previous good management of 2 days or less of low function due to migraines per month.

No access or not enough access to treatment from a licensed acupuncturist means my function is low and I am unable to work because of the intensity and frequency of the migraines (can't drive or work on or near a screen while the classic migraines are active; besides the pain itself).

I strongly support insurance and other reimbursement coverage of treatment by an [NCCAOM](#) board certified licensed acupuncturist for all types of migraines and headaches.

If you are interested in some citations of research, please respond with a note to tell me of your interest.

Sincerely,
Megan Kingsley Gale
Spouse of active duty military servicemember

Megan Kingsley Gale, MSAOM, Dipl. OM (NCCAOM®), LAc, LMT
megankgale@outlook.com

From: Rebecca Kitzerow <rebecca@allwayswell.org>
Sent: Thursday, August 26, 2021 11:34 AM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for Chronic Migraine and Chronic Tension HAs

External Email

As an acupuncturist with over 15 years of experience, I want to lend my support for the review of Acupuncture for chronic type migraine and tension headaches. I see many patients for whom Acupuncture is an essential part of their care plan to manage these issues, cases where medications fail to provide enough relief for them to work without interruption and have the quality of life that they desire. Some of them do use botox as well, others find it ineffective or not worth the risk of paralysis.

Considering the inexpensive, low to no side effect profile and success of Acupuncture treatment in these cases, I am happy to hear that it is being re-reviewed for consideration in these cases and I want to strongly lend my support for it being covered by insurance and considered a reasonable standard of care.

WEAMA has compiled compelling research to support the argument for covering Acupuncture in these cases and I appreciate your office taking the time to re-review them and this issue.

Be well, stay safe, and thank you for your time,

~Rebecca

2014, 2017, 2018 & 2019 Nattie Award Winner - Favorite Natural Women's Health Specialist
2014 through 2019 Nattie Award Winner - Favorite Acupuncturist/TCM Practitioner
2015 through 2019 Nattie Award Winner - Holistic Practitioner of the Year
2017 through 2019 Nattie Award Winner - Favorite Natural Health Center (All Ways Well)

Rebecca Kitzerow, LAc
All Ways Well, LLC

T/F/Txt: 360-952-3074 GP: She, Her
E: rebecca@allwayswell.org
W:

From: Dr. Melissa Kohler <drmkohler@natclinic.net>
Sent: Wednesday, August 4, 2021 2:55 PM
To: HCA ST Health Tech Assessment Prog
Subject: Headaches and migraines

External Email

Hello,
I do acupuncture on my patients for headaches and migraines since 16 years. I do see improvement in patient's head pain with acupuncture for prevention and acute care.

Melissa Kohler, ND, LAc

(360) 491-4131
3624 Ensign Rd NE, Suite B
Olympia, WA 98506
www.NaturalHealthClinicofOlympia.com

From: greg fosterwellness.com <greg@fosterwellness.com>
Sent: Tuesday, August 24, 2021 3:05 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for Chronic Migraine

External Email

I wanted to provide my official support for continuing to allow acupuncture to be used as a treatment modality for patients with headaches, including those with chronic migraines. My patients have, anecdotally, found consistent relief from their discomfort through ongoing acupuncture treatments.

If there is any other information I can provide to lend my support for this, please let me know.

Greg.

Dr. Greg Lewerenz, DAHM, EAMP, C. SMA, CMTPT, LMT, RYT
Foster Wellness
Pronouns: he | him | his
WA Licenses: AC60114046, MA00023193
www.fosterwellness.com
P: 206.856.4096 [landline]
F: 206.267.9491

From: Eugene Mahoney <aermidacupuncture@gmail.com>
Sent: Thursday, August 26, 2021 3:28 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for chronic migraine and chronic tension headaches

External Email

I am understanding that the coverage of those with chronic migraines or tension-type headaches is under question? I have treated many patients and continue to, successfully who have suffered from these things all their lives. Most of my patients who suffer from these are predominantly women. They have only been able to find relief after seeking acupuncture care. Some are better with a few treatments some require occasional follow ups but overall my patients (and I know this to be true for other practitioners) have had a significant improvement in quality of life after seeking care from an acupuncture. This would seriously impede those who rely on health insurance for access to health care but will not impede the few patients who can afford to pay out of pocket. Making this not only a quality of life disparity that affects predominantly women but poorer women especially.

Please reconsider covering acupuncture for migraines and tension headaches.

Thank you,

Eugene Lee Mahoney, EAMP, Lac
Aermid Acupuncture PLLC
@North Seattle Natural Medicine

From: Roberto Masferrer <robertomasferrer@yahoo.com>
Sent: Monday, August 30, 2021 2:36 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for the treatment of migraines

External Email

To whom it may concern:
Please support the use of acupuncture in the treatment of migraines and tension headaches. I am an acupuncturist in Walla Walla, and I see many people for migraine and tension headache relief. In my experience it is a very effective treatment. Regular treatments can reduce the intensity, duration and frequency of migraines. The treatments are useful to address an ongoing migraine or to prevent migraines from occurring.

Thank you for your consideration.

Roberto Masferrer Kumo Acupuncture and Oriental Medicine (503) 318-9490 www.kumoacupuncture.com

From: Nikki Medghalchy <nikki@aachc.com>
Sent: Wednesday, August 4, 2021 1:18 PM
To: HCA ST Health Tech Assessment Prog
Subject: Chronic migraines

External Email

Hello,
This is Dr. Nikki Medghalchy from Advanced Acupuncture and Chinese Herbal Clinic from Vancouver, WA,
Website address www.aachc.com.
Would like to share my 22+ years of experience treating chronic migraines. It has been very successful and
effective of treatment modalities for this symptoms. For further questions please do not hesitate to contact
my office.
Have an excellent day

Dr. Nikki Medghalchy DAOM, L.Ac
O-360-571-8515
O- 503-908-0157
F-360-571-8516
F-503-908-0187

From: YVONNE PASTIKA <YVONKA88@msn.com>
Sent: Sunday, August 8, 2021 3:36 PM
To: HCA ST Health Tech Assessment Prog
Subject: Migraine and Tension Headache under review

External Email

Hello HTA,
I am an Acupuncturist in Seattle/ Renton area of Washington.
I treat patients daily with Acupuncture to relieve headache/ migraine symptoms.
Because some people are sensitive to NSAIDS, and prescription medication,
Acupuncture is one of the best modalities for treatment of headache, without having to use
prescription or over the counter medications.
Many studies have validated that Acupuncture brings rapid relief for patients that suffer from
migraines and tension headaches, by clearing the head and reducing tension.
Yvonne PastikaLAc.

From: trevor seigny <trevords@hotmail.com>
Sent: Wednesday, August 4, 2021 2:24 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture Treatment of Chronic Migraine Headache

External Email

For over 16 years I have treated patients who suffered from chronic migraine headaches. It has been typical to see a reduction of both intensity and frequency of symptoms over time and in some cases remission has been achieved. Patients who had stopped responding to medications for their migraines were often still able to improve under acupuncture treatment. Several patients were able to discontinue migraine medications (under the supervision of the prescribing authority), without losing the improvements achieved through acupuncture.

In addition, treatments received during migraine episodes or during the prodrome stage are typically effective at reducing or alleviating symptoms and may accelerate the course of the episode (I have seen patients who were accustomed to being incapacitated for several days with their headaches return to work in a day or less when treatment was timed in this manner).

Thank you for examining this very effective medical application. Many patients have profoundly improved their lives through this care, while many more who suffer from chronic migraine but have not yet sought acupuncture care are losing out on productivity and enjoyment of life.

Sincerely,
Trevor Seigny, LAc, MSAOM
Sound Medicine
Seattle Acupuncture Associates

August 19, 2021

Hello,

Please consider this my comment on Acupuncture for Migraines

I have been licensed and actively practicing acupuncture in the states of Washington and Oregon since 2001. I have treated patients with chronic migraines both as a chief complaint and a concomitant condition dozens of times.

When Migraine is the chief complaint, it is usually the case that the patient has been prescribed one or more medications over many years or even decades that has/have usually stopped working. In these cases, I advise to keep treatments weekly or bi-weekly for 3-6 months, depending on the lasting effects that each individual experiences, spacing treatments out to bimonthly then monthly for another 6 months. After a year, the migraines have either completely ceased or have dramatically been reduced in frequency and duration in the vast majority of patients. When these do recur, the previously prescribed pain medications are more effective, and resuming acupuncture for another several months nearly always eliminates the regular occurrence and reduces or entirely eliminates the need for pharmaceutical pain management once again.

When Migraine is not the chief complaint, if the treatment lasts over 6 sessions, the patients notice reduction in intensity about half the time, and reduction in frequency a little less than half the time.

It is very clear to me over my 20 years of practice, that one of the more obvious conditions that acupuncture is effective in treating is Chronic Migraine.

Thank you for your consideration of this acupuncture practitioner's comment. I sincerely hope that acupuncture continues to be considered a medically appropriate treatment for chronic migraine.

In Health,

~Laurie Solomon, L.Ac.

POB 1342
Battle Ground, WA 98604
(360) 666-1070
starfire567@yahoo.com
www.LaurieSolomon.com

From: [Empyrean Acupuncture, PLLC](#)
To: [HCA ST Health Tech Assessment Prog](#)
Subject: Acupuncture for chronic migraine and chronic tension-type headache re-review comments
Date: Thursday, August 26, 2021 11:20:13 AM

External Email

Attn: Health Technology Assessment (HTA) program

I would like to thank you for your review of acupuncture for chronic migraine and tension type headaches. It has become clear that not only do many acupuncture practitioners have personal experience with offering successful treatments to their patients for migraines and headaches in general but there is also substantial evidence and institutional acceptance of this treatment to further support our experiences.

There are many strong research studies that support the use of acupuncture for migraines for review, and we also want with this letter to punctuate the current level of support within the healthcare system for this treatment. The Veterans Administration (VA) has conducted their own literature reviews and research demonstrating that acupuncture for migraines and headaches have evidence of positive effects, substantial body of evidence resulting in high confidence in the treatment. (1) The National Center for Complimentary and Integrative Health also supports acupuncture for chronic headaches:

“Results from a number of studies suggest that acupuncture may help ease types of pain that are often chronic such as low-back pain, neck pain, and osteoarthritis/knee pain. It also may help reduce the frequency of tension headaches and prevent migraine headaches. Therefore, acupuncture appears to be a reasonable option for people with chronic pain to consider.”(2)

The American Migraine foundation also recommends acupuncture treatment for Migraines:

“Based on a recent systematic review of 22 clinical trials involving 4985 people, there is evidence that acupuncture reduces the frequency of headache in individuals with migraine, and that the effect may be similar to that observed with preventive medications. The frequency of headache is dropped by 50% or more in up to 59% of individuals receiving acupuncture and this effect can persist for more than 6 months.”(3)

And most recently we have this research that just came out this year, the ACUMIGRAN study; this study compared acupuncture treatments with pharmacological treatments for migraine, comparing headache frequency at the end of treatment;

“Data suggested that acupuncture could be adopted as migraine prophylaxis and seem to be slightly superior to pharmacological treatment in compliance and rate of adverse events.” (4)

Evidence continues to grow in support of acupuncture for migraines and tension-type headaches. Not only is the treatment effective but it is cost effective and safe, short term and long term. All medical professionals take an oath before they are allowed to practice stating their commitment to do no harm. Acupuncture as a form of medicine offers a safe and reliable approach. From an overview of systematic reviews on migraines it was “concluded that

acupuncture treatments had fewer adverse events than medication, which indicated that acupuncture was a safe therapy for migraine.” (5)

The Health Care Authority (HCA) has supported botulism toxin (Botox) treatments for headaches. While these studies show few adverse events directly after the treatment, some long-term consequences come later when the toxin begins to spread throughout the body.

“Onabotulinumtoxin A injection is given as a number of tiny injections intended to affect only the specific area where injected. However, it is possible that the medication may spread from the area of injection and affect muscles in other areas of the body. If the muscles that control breathing and swallowing are affected, you may develop severe problems breathing or swallowing that may last for several months and may cause death. If you have difficulty swallowing, you may need to be fed through a feeding tube to avoid getting food or drink into your lungs.”(6)

The treatment uses a neurotoxin which can lead to nerve damage (7) and weakness of the neck muscles among other complications. Acupuncturists have reported cases of patients coming in with this issue and seeking acupuncture to not only help with the migraines, but to also help recover from the Botox treatments’ long-term effects. Not only does acupuncture help directly with the relief of migraines but it can also further complement Botox treatments by minimizing the side effects – it is a primary treatment as well as a complementary treatment.

Acupuncture as a treatment for migraines and tension type headaches has a growing body of evidence demonstrating efficacy as well as safety short term and long term. The entire medical community and healthcare system are always in search of the best solutions and treatment venues for whole patient care with lasting effects. Research and experience alike have shown that not only is acupuncture safe and effective for treatment of chronic migraines and tension type headaches, but it also cost effective.(8)

Thank you for your time and consideration.

-Jon Silliman

From: Mia Song <mia_song@msn.com>
Sent: Monday, August 30, 2021 1:01 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for migraines and tension headaches

External Email

I have been a practitioner of acupuncture for over 20 years and have successfully treated countless patients who have come in for migraines and chronic tension headaches. Most of these patients were already on medications for migraine and have tried other therapies with some relief but still experiencing migraines and headaches on a consistent basis. We were able to significantly reduce the symptoms and improve the quality of these patients lives.

Please support acupuncture for the treatment of migraine and tension headaches. This is much needed safe therapy for these conditions.

Thank you for your time and consideration, Mia Song, EAMP

Sent from my iPhone

From: Katharine Ting <combko@hotmail.com>
Sent: Thursday, August 26, 2021 6:16 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for chronic migraine and chronic tension-type headache selected for re-review by HTA program

External Email

To Whom It May Concern,

I am an acupuncturist and naturopathic physician in the state of Washington. I am writing in support of acupuncture as an effective treatment for chronic migraine and chronic tension-type headache. In my 16 years of experience, I have successfully treated many patients with migraine headache and tension headache using acupuncture alone.

I thank you for your review of acupuncture as a treatment for chronic migraine and tension-type headaches.

Sincerely,

Katharine Ting, ND, LAc

From: Angie Y <angievshusky6@yahoo.com>
Sent: Thursday, August 26, 2021 8:56 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture to treat Migraine

External Email

To whom it May Concern,

Please consider acupuncture to treat migraines and tension-type headaches. Throughout my practice for the past decade, I have successfully treated many migraine and related headache conditions using ACUPUNCTURE method. Many of my patients swear by it that by far acupuncture is the BEST treatment they have got results from. Real cases, real people, real benefits. Please re-consider acupuncture to treat Migraines and tension headaches!

Many thanks!

Angie Yin, Lac.

From: Nick Spurlock <nick.spurlock@bastyr.edu>
Sent: Monday, August 9, 2021 2:40 PM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for Chronic Migraine

External Email

Hello,

Acupuncture is effective for all types of headaches, including migraines and chronic tension. I have watched it work many times and it provides much needed relief to those afflicted. Acupuncture is a minimally invasive medical procedure that activates the biochemical reactions of wellness to treat disease. It is a safe and cost-effective treatment option for those who suffer from migraines and chronic tension headaches. Patients deserve this treatment option.

Wishing you wellness,
Nick

From: solutionbasedacupuncture@gmail.com
Sent: Wednesday, August 4, 2021 9:20 AM
To: HCA ST Health Tech Assessment Prog
Subject: Acupuncture for Migraines

Follow Up Flag: Follow up
Flag Status: Completed

External Email

Hello,

I am an acupuncturist in Washington state for the past four years. In the course of my clinical practice I have seen dozens of patients successfully respond to acupuncture for the treatment of migraines and other headaches. In some cases, the patients had not only suffered from severe, frequent migraines for years but had also exhausted conventional treatment strategies to no avail. Within the course of acupuncture, patients notice a decrease in the frequency, duration and severity of migraines and have been very pleased with the results. Often, these improvements can last months between treatments.

Please ensure that insurance companies continue to allow acupuncture to treat migraines so we can continue to support and heal the people of Washington!

I'm happy to speak further on the subject or answer any questions you may have,

Thank you,

Anna

Sent from my iPhone

APPENDIX B: Key Question-PICOTS Public Comments Received

From: Innate Radiance Clinic <innateradiance@gmail.com>
Sent: Friday, September 17, 2021 12:00 PM
To: HCA ST Health Tech Assessment Prog
Cc: Emerick, Leslie
Subject: Comments on health technology - Headaches migraines

External Email

Good morning,

On behalf of the Washington Acupuncture and Eastern medicine association, I would like to submit these additional comments in response to the new comment period that you open. Due to an urgent matter this week - I was not able to email by yesterday, a response that we believe we have already provided. I am submitting anyway, for the sake of good additional communication. Here are the responses:

- Have appropriate populations or indications been identified? Response: The appropriate population and indication is that everyone who gets migraines-headaches- they are usually adults and the research submitted addresses that.
- Are appropriate comparators identified? Response: The reviews do not compare acupuncture to other therapies. They were a stand alone review for acupuncture efficacy. The previous review compared Botox to acupuncture, but not this one.
- Have appropriate patient-oriented outcome measures been included? Response: Patient outcomes have been included.
- What special policy or clinical considerations could affect the review? Response: We do not know of any special policies or clinical considerations that could affect the review.

We believe all questions have been addressed. Please let us know if you have any other questions.

Best regards,
NataliePascale Boisseau, LAc EAMP
Board member WAEMA

