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DATE	March 26, 2026
TO	Acupuncture Board Members
FROM	Kristine Brothers, Policy Coordinator
SUBJECT	AB 2668 Analysis

[Assembly Bill 2668](#) (Fong)

Acupuncture: license requirements and title protection.

Status: Amended March 16, 2026.

Existing Law:

- Under the Acupuncture Licensure Act, establishes the Acupuncture Board to license and regulate the practice of acupuncture.
- Requires applicants for an acupuncture license to provide satisfactory evidence of completion of an approved educational and training program, unless they meet specified alternative requirements.
- Further defines an “approved educational and training program” as a school or college offering education and training in acupuncture that includes a curriculum of at least 3,000 hours, consisting of 2,050 hours of didactic and laboratory instruction and 950 hours of supervised clinical training.

Summary of Bill:

Beginning January 1, 2032, AB 2668 would require approved acupuncture educational and training programs to provide curriculum that confers a doctoral degree in acupuncture and Chinese herbal medicine consisting of not less than 3,300 hours, of which at least 2,220 hours are didactic and laboratory training and at least 1,080 hours are supervised clinical instruction.

The bill would also apply existing restrictions on the use of the title “Doctor” or the abbreviation “Dr.” to the title “Doctor of Acupuncture and Herbal Medicine” (D.A.H.M.) and would prohibit a person from using the title “licensed acupuncturist” (LAc) unless they hold a valid, active license under the act. The bill would make related conforming changes.

Board Impact:

The changes from AB 2668 would have several operational and regulatory impacts on the Board such as:

- Amendments to education regulations for consistency with new statutory requirements;
- Increase in the number of curriculum reviews for the updated doctoral programs;
- Updates to education and exam forms;
- Increased inquiries from schools, students, and current licensees;
- Revisions to the Board's website and public guidance materials;

- System updates to track licensees holding doctoral degrees; and
- Increased enforcement activity related to misrepresentation of the “Dr.” title.

Although the bill increases total and clinical training hour requirements, it does not specify how those hours must be allocated across existing curriculum subject areas, such as basic sciences or acupuncture theory. Current requirements under California Code of Regulations § 1399.434 establish detailed hour distributions based on the current 3000-hour curriculum requirement, so the Board would need to determine how to realign or redistribute hours to ensure consistency between statute and regulation. This would require regulatory amendments and result in additional workload related to program review and approval.

The bill restricts the use of the titles “Doctor” and “Doctor of Acupuncture and Herbal Medicine” unless specified criteria are met. The structure of AB 2668 creates a potential ambiguity between its intent and its execution, particularly when examining how the bill amends subsection (b) of BPC §4936. On one hand, the bill moves the profession toward a doctoral-entry educational standard starting in 2032 by requiring all approved acupuncture programs to confer a doctoral degree in acupuncture and Chinese herbal medicine, as set out in the amended BPC §4927.5. On the other hand, the same bill introduces a new protected professional title, “Doctor of Acupuncture and Herbal Medicine” (DAHM) and its abbreviation “D.A.H.M.”, within BPC §4936. The protected-title provision appears designed to correspond with the elevated doctoral training standard. However, subsection (b) of §4936 also preserves the long-standing rule that an acupuncturist may not use the title “Doctor” or any related abbreviation unless they hold a doctoral degree that actually authorizes the specific title being used, and that they must indicate the type of degree authorizing that use. Because this subsection continues to require practitioners to use doctoral titles that match the formal degree they earned, the statute effectively prevents an acupuncturist from using the DAHM title unless their doctoral degree itself is titled Doctor of Acupuncture and Herbal Medicine or otherwise confers that specific designation. This creates a disconnect.

If the Legislature intended DAHM to function as a standardized, license-level title that all future acupuncturists by virtue of holding an acupuncture license and the newly required doctorate, subsection (b) does not reflect that intent. Instead, it imposes a strict degree-matching requirement, limiting use of the DAHM title to individuals whose earned degree bears that exact designation. As a result, even after 2032, acupuncturists who hold doctoral degrees with other common titles, e.g. DACM, DAOM, DAc, or DOM, would not be permitted to use the DAHM protected title unless their degree was formally titled in a way that authorizes that usage. Accordingly, although AB 2668 introduces DAHM as a protected professional title within the same bill that raises the educational standard to a doctoral level, subsection (b) fails to establish that the Legislature intended DAHM to operate as a universal licensure designation. As written, the bill preserves variation in doctoral degree titles and does not provide automatic authorization for all post-2032 licensees to use the DAHM title designation, reinforcing that the protected title remains tied to a specific degree title nomenclature rather than functioning as a universal title.

Overall, AB 2668 introduces changes that propose standardization in education and licensure requirements but does not take into account existing and alternative pathways to licensure. These changes may have implications for current students, applicants, and licensees, particularly with respect to transition timelines and eligibility pathways. Staff is working with the author’s office to address some of these outlined concerns.

Fiscal Impact:

AB 2668 would have both short term and long-term fiscal impacts.

In the short term, the Board will incur increased costs associated with implementation, including regulatory updates, staff training, outreach, revision to education and examination forms, updates to guidance materials, and modification to IT systems to track doctorate level licensees. The Board would need to determine how the additional 300 curriculum hours are allocated to meet doctoral-level competencies, with input from a special committee of subject matter experts. The work required to establish a detailed breakdown of the increased curriculum hours alone could take anywhere from 16 to 32 hours of time. These curriculum changes would require regulation changes that could be done under one rulemaking. The rulemaking process generally takes 300 hours of Analyst II time, 120 hours of Supervisor I time, and 50 hours of Executive Officer time on a regulatory action for the duration of the rulemaking process. There is also Board member review and discussion time of approximately two hours.

The updates to outreach, guidance materials, and the education and examination forms would take approximately 10 hours of time for an Analyst II and three hours of review for a Supervisor I.

An increase in workload related to responding to inquiries and processing applications (from programs and applicants) under revised eligibility criteria is also estimated to increase. The legislation will require curriculum changes to all Board-approved education and training programs. Each program must submit its updated curriculum for Board review and approval. This will increase the workload for the Education Desk during the transition period. There are currently 37 Board-approved educational and training programs. Thirteen of those programs already confer a doctorate degree. Assuming all programs require curriculum revisions to comply, a single curriculum review takes on average 80 hours of an Analyst II, which accounts for the initial and subsequent reviews. The influx of revised curricula will result in a collective increase in curriculum review time of approximately 2,960 hours which would require the addition of 1.7 limited term Analyst II positions. The Board does not have statutory authority to assess fees for curriculum review; as a result, the costs associated with the curriculum reviews are absorbed by existing licensing fees paid by licensees. The Board may consider requesting that a curriculum evaluation fee be instituted to address the increased costs of addressing these reviews.

In the long term, fiscal impacts will depend on how the bill affects the volume and composition of applicants. Changes to licensure requirements may influence application volume, which could in turn affect licensing fee revenue. At this time, an estimate in potential revenue loss cannot be determined based on the uncertainty of future licensing trends.

Overall, AB 2668 is expected to result in initial implementation and transition costs, with long term fiscal effects dependent on application trends and ongoing workload.

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