

Sun 9/10/2011

Dear Sir/Madam,

As a qualified and practising TCM practitioner for the past 15 years, I wish to raise my concerns about the way TCM practitioners are being consulted about proposed requirements for the national registration of TCM practitioners.

We have been given less than two weeks to review pages of documentation that has been presented in such a complicated way that it makes a native English speaker's head spin, let alone someone from a non-English speaking background.

This is not proper consultation. It is unfair, discriminatory and hopelessly inadequate.

Evidence of the mismanagement of the consultation process is provided by the fact that an addendum to the Consultation Paper (released on 5 September 2011) had to be published on 27 September 2011 - less than two weeks before comments close on Monday, 10 October 2011. The addendum made reference "to a discussion paper that is not included" in the consultation paper. How could such a serious omission be allowed to occur?

Withholding vital information and then asking someone to comment on a process that is supposed to be carried out in a fair, equitable and transparent manner is not a democratic process.

As a fellow of the AACMA, I request that the following comments be considered by all connected with an exercise that is supposed to advance TCM standards in Australia:

- Australian-trained practitioners applying for registration under the national scheme should not be put to a higher grandparenting standard than that applied under the Victorian registration scheme;
- All government/university-accredited qualifications of at least three years full-time equivalent duration should be included on the list of courses deemed adequate for grandparenting, and that this include the past advanced diploma and diploma level programs;
- The list submitted by the AACMA of Australian Chinese medicine programs deemed adequate for grandparenting purposes should be included on the CMBA list of courses deemed adequate for grandparenting purposes.

For grandparenting purposes, existing practitioners from a non-English speaking background should have their English language competence assessed as follows:

- A practitioner who has passed a Chinese medicine examination conducted in English should be sufficient evidence of English language competence for grandparenting purposes.

Meikin Rees
AACMA Fellow

Australian Acupuncture & Chinese Medicine Association (AACMA)