

Mon 10/10/2011

To Whom It May Concern:

My name is Prem Sidika Ashauer and I am a past student of the Australian Institute of Applied Sciences (AIAS) in Brisbane, Australia.

On page 37 of the CMBA proposed registration standards consultation paper you were seeking advice on whether we agree with the qualifications standards.

Please let the record show that I vehemently object to the proposed grandparenting standard for two main reasons.

- 1) I have completed a government approved 'Advanced Diploma of Acupuncture' with AIAS. As with most advanced diploma courses throughout Australia that require 200-300 hours of clinical training, we were required to complete 300 hours of clinical training, which falls short of the 390 hours proposed by the CMBA draft. This potential discrimination will affect hundreds of past students from colleges and universities Australia wide (with the exception of students who studied in Victoria).

Australian-trained practitioners applying for registration under the national scheme should not be put to a higher grandparenting standard than applied under the Victorian scheme.

All government/university-accredited qualifications 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 from AIAS.

- 2) Under the current CMBA proposal the biggest issue for any AIAS student that graduated after 2007 is that they will be ineligible for CMBA registration because they will not have completed five years of clinical practice. Now if the CMBA had proposed this back in 2005/2006 perhaps students and colleges/universities could have put contingencies into place to fast track students advanced diplomas to meet the deadline of 31st December 2007. However CMBA **have only just released this proposal** thereby alienating hundreds and hundreds of students that completed an accredited advanced diploma course. If you must go ahead with this unfair and unnecessary proposal you should give adequate notification of at least 1 year!

In addition, Australian-trained practitioners applying for registration under the national scheme should not be put to a higher grandparenting standard than applied under the Victorian scheme.

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.

The CMBA proposal in its current state **effectively discriminates** against every single student that has ever studied acupuncture at AIAS; since AIAS has been providing accredited acupuncture courses since 1994 that's a lot of students who have been unfairly victimised.

This CMBA proposal is impractical, unjust and really unfair. I don't understand how people can be allowed to introduce rules that would seek to discredit and punish practitioners who have undertaken studies that were and still are, lawfully accredited. What gives you the right to do this to people? It's not right.

I trust that you will consider this issue with intelligence before finalising the CMBA registration standards. Thank you for your time.

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