

To Whom It May Concern:

My comments on the draft for National registration highlight concerns in particular regarding the grandparenting standard.

As an AACMA member and practitioner since 1987, I graduated from a bachelor degree course approved by the AACMA and have undertaken continual professional education and maintained the ethical standards monitored by the AACMA. I am sure you are aware that this is the standard for the profession in Australia.

Like many of my long term colleagues in the profession who graduated before 2008, the draft standard requires me to prove my competence in the same manner as unqualified practitioners. I am unclear if this level of competence is for the benefit of the public's safety or for an increased professional standard or both.

In any case, after 25 years in continuous practice without malpractice or harm to any patient and a dedication to continuing education, it would be reasonable to think that a level of competency in my chosen profession had already been proven beyond doubt, at least as far as patient safety is concerned.

There are a number of considerations I wish to bring to the attention of the CMBA;

- 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 this include the past advanced diploma and diploma level programs.
- Unaccredited programs that were recognised by AACMA as meeting the requirements for practice at that time should also be included on the list of courses deemed adequate for grandparenting, and that this include the past practitioner diploma and unaccredited bachelor 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.

As a practitioner and longstanding member of AACMA I am curious to know what necessitates draft grandparenting standards that equate established practitioners with unqualified ones, and subjects established practitioners to higher educational requirements than those in the Victorian registration process. It seems only reasonable to ask the CMBA to provide the AACMA and its members with evidence for the necessity of such requirements.

Yours sincerely,

Richard Best