

10/10/2011

To Whom It May Concern:

My name is Elvira Byrnes 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. As far as I am concerned the cut-off date for completion of advanced diploma courses should be 30th June, 2012, which of course is the day before national registration starts. And to be honest, even that's a little unfair because the CMBA proposal is only just coming out now.

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.

I hope that you take the content of this letter into consideration before finalising the CMBA registration standards. Thank you for your time.

Elvira Byrnes
Past student of AIAS
Member of ATMS
