

Tue 4/10/2011

Dear CMBA,

I am writing to express my disappointment with regard to the recent draft guidelines for registration of the TCM profession, specifically the grandparenting arrangements.

I would like to note the following:

- 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 should include previous 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 should 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;
- Having regard to the grandparenting evidence of practice requirements, the cycle for recency of practice should be extended to 5 years;
- Importantly, also, the CMBA grandparenting standards must take into account non-practising members of the profession to enable them to obtain non-practising registration during the grandparenting period. Otherwise, the standards discriminate against practitioners such as myself who are currently on maternity leave.

I would appreciate your attention to these matters, in order to create guidelines that protect the public but also allow practitioners to continue their profession and livelihood.

Kind regards,

Tara Chatterjee
TCM practitioner