

Wed 5/10/2011

CMBA

Re: Grandfathering standard

I have just had access to the proposed registration standards for grandfathering acupuncture practitioners.

I am concerned that the proposed legislation has major shortcomings in regard to existing practitioners especially Australian trained acupuncturists and also the time frame for consultation which appears extraordinarily short.

There are many different forms of acupuncture besides the Chinese body acupuncture, such as the micro systems of acupuncture which are practiced by thousands of practitioners around the world. Nogier auriculotherapy, hand acupuncture, face acupuncture, head acupuncture, foot acupuncture, nose acupuncture, bioblographic acupuncture (ECIWO) etc. Also there is Japanese acupuncture, Korean acupuncture, Mongolian Traditional Medicine which has its own form of acupuncture, Tibetan Traditional Medicine has its own form of acupuncture.

How will these other systems be viewed? Some practitioners only practice the micro systems, but they all come under the heading of acupuncture, some have been around for hundreds of years but they differ from the Chinese body acupuncture and TCM.

I have practised acupuncture since 1975 and our group set up one of the first acupuncture associations in Australia, we promoted acupuncture seminars and courses in those early years, yet it appears that those early practitioners who were the pioneers of acupuncture in Australia will be discriminated against for having attended different training courses and colleges.

I am concerned based on published documents that my early qualifications may not be recognised for grandfathering purposes under the national scheme even though I have been in practice using acupuncture over 35 years.

It brings into question the legitimacy of the allocated time for the consultation period as these matters need thorough clarification so that those early practitioners are not discriminated against.

Yours sincerely

Dr Douglas Dickmann DC. DAC

Wed 5/10/2011

To: Chinese Medicine Board of Australia

Submission on the Draft National Registration Standards

The AACMA recently informed members of the release of draft national registration standards for Chinese Medical practitioners. I am writing to submit input on the formulation of such standards, particularly the draft grandparenting standard. As a practitioner who qualified in an AACMA approved program 27 years ago, who has been in practice for 37 years undertaking continual professional education monitored by the AACMA, the draft standard requires me to prove my competence in the same manner as unqualified practitioners. It will also require hundreds of my colleagues in established practices who graduated before 2008 to do the same.

I would like to include in my submission the following statements:

- 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 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 evidence for the necessity of such requirements.

Yours sincerely

Dr Douglas Dickmann DC, DAc.
262 Montacute Rd
Rostrevor SA 5073