

Fri 7/10/2011

Board members,

I have been practicing Chinese Medicine since 1993 and have been a member of AACMA since 1995. I have lectured in Chinese Medicine at Endeavour College Of Natural Health in Brisbane since 1999. Please take into consideration what I consider to be fair grandfathering requirements for national registration outlined below.

- Australian-trained practitioners applying for registration under the national scheme should not be put to a higher grandfathering 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 grandfathering, and that 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 grandfathering, 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 grandfathering purposes should be included on the CMBA list of courses deemed adequate for grandfathering purposes.
- The CMBA grandfathering standards must take into account non-practising members of the profession to enable them to obtain non-practising registration during the grandfathering period.
- Practitioners of Chinese Herbal Medicine who currently primarily prescribe manufactured product (such as TGA-listed AUST L product) be deemed adequate for grandfathering as Chinese Herbalists provided they meet the grandfathering criteria for registration as an Acupuncturist.

I am particularly concerned that current practitioners using Patent Chinese Herbal Formulae may not meet Chinese herbal medicine registration standards. Patent formulae are generally considered safer to prescribe than raw formulas, it makes sense to allow this practice to recognise the safe practice of Chinese herbal medicine rather than to limit recognition of practitioners to those who prescribe raw herbs or individual process processed herbs. The draft criteria for proving competence in Chinese herbal medicine practice them will have the effect of denying continued use of title and practice fore a large number of legitimate practitioners.

Regards
Debra Godson