

Sat 8/10/2011

Dear CMBA members,

I am an Australian Trained practitioner wanting to apply for registration under the national scheme. I am also a currently a Non-practising Acupuncturist who graduated with pre-2008 qualifications recognised by AACMA.

I have serious concerns about the Draft Standards for Registration and the impact on myself and many highly skilled and trained members of my profession. The grandparenting standard creates an unjustifiable burden on legitimate existing practitioners holding bona fide qualifications.

Specifically:

- **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.**
- A national scheme should *not* have a higher grandparenting standard than that 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
- 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 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.

The extremely short timeframe imposed on the CMBA for consulting on these standards creates concerns that the CMBA will be working under pressure and rush through standards that will disadvantage many members of my profession.

Major areas of concern include:

- Practitioners with pre 2008 and post 2007 qualifications
- Non-practising practitioners
- Practitioners with limited English language skills
- Practitioners using traditions that developed out of Chinese Medicine
- Practitioners who use manufactured product or practice Kampo medicine

I ask that the board take the points noted into consideration.

Your Sincerely,

Dyanne Jackson

Registered Psychologist #6877 M.A.P.S. BA Hons Psy

Dip T: Sp Ed; Dip Counselling; Dip ClinicalHyp:

AACMA Member No. 216