

7 October 2011

Mr Anthony Lee

Chinese Medical Board of Australia

Dear Sir / Madam

I am writing to you with regards to the Draft Registration Standards that have been released in early September 2011.

I graduated in 1998 with an *'Advanced Diploma of Applied Science in Acupuncture'* from the Academy of Natural Therapies on the Gold Coast. At that time, the Advanced Diploma was the highest qualification offered which provided the Graduates with qualification as an Acupuncturist. This was a three (3) year full time course with Austudy approval, conducted by recognised lecturers, some of which are current board members of AACMA.

The *'Advanced Diploma of Applied Science in Acupuncture'* was at the forefront of education in the Natural Health Profession at the time of my graduation. It is the same qualification that has also enabled fellow class members the opportunity to hold positions on the Board of Acupuncture and the AACMA.

Since my graduation I have be practicing as an Acupuncturist for 13 years and most recently established a successful practice in the semi remote location of Yeppoon, Central Queensland. During the past 13 years I have obtained countless practical case experience, maintained my membership with the Australian Acupuncture and Chinese Medicine Association, ensuring that I adhered to the set rules regarding Professional Indemnity, maintaining training requirements such as First Aid and continued my study with the required CPE points.

The proposed Draft Registration Standards adversely affects my qualification, AACMA membership and 13 years of work experience and potentially deems them irrelevant.

I understand that Grandparenting is about mechanisms to enable legitimate practitioners to continue to practise in the profession and this should take into account the legitimate standards that applied at the time they undertook their studies. I strongly oppose to the arbitrary and retrospective application of requirements being proposed in the Draft Registration Standards.

I urge you to consider 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 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 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.

Regards

Anthony Lee  
Adv Dip of Applied Science in Acupuncture