

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 Medicine 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 approximately 10 years who has been in practice for 35 years and a graduate of the Melbourne College of Acupuncture 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

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