

Wed 5/10/2011

Dear Sir/madam,

I have recently read the draft for national registration standards. As a practicing Traditional Chinese Medicine and acupuncture practitioner who qualified in 2006 with an Advanced Diploma in Traditional Chinese Medicine, I am extremely concerned with the initial draft. I wish to raise the following major concerns;

In regards to members with pre-2008 qualifications:

- 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.**

In regards to English language skills:

- **self-assessment of competence based on a signed statutory declaration**
- **conduct of the practitioner's Chinese medicine practice primarily in English should be sufficient evidence of English language competence for grandparenting purposes;**
- **community/academic/professional engagement where the language of communication is English should be sufficient evidence of English language competence for grandparenting purposes;**
- **where a practitioner has passed a Chinese medicine examination conducted in English should be sufficient evidence of English language competence for grandparenting purposes.**
- **Where a practitioner conducts his or her practice in a language other than English and is otherwise unable to provide sufficient evidence of English language competence, then conditions may apply.**

Kind regards

Ian Russell