

Wed 5/10/2011

To: The 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 Medical practitioners. I am writing as a practitioner to submit input on the formulation of such standards, particularly the draft grand-parenting standard.

I am a practitioner who qualified in an AACMA approved program 24 years ago and I have been in practice for past 24 years. For each of these years in practice I have undertaken continual professional education, monitored by the AACMA, well in excess of the required amount of hours (often more than double the hours) as I believe that this profession requires a lifetime of study.

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 doubt that many, if any of the people who graduated after 2008 would have accumulated anywhere near the number of hours of study in our chosen field as I have accumulated.

I would like to include in my submission the following statements:

- Australian-trained practitioners applying for registration under the national scheme should not be subjected to a higher grand-parenting standard than applied under the Victorian scheme.
- I believe that all government/university-accredited qualifications of at least three years full-time equivalent duration should be included on the list of courses deemed adequate for grand-parenting, 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 grand-parenting, 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 grand-parenting purposes should be included on the CMBA list of courses deemed adequate for grand-parenting purposes.

As a practitioner and member of AACMA I am curious to know what necessitates draft grand-parenting 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 member's evidence for the necessity of such requirements.

Yours sincerely

Walter Simpson
Immediate Past President of AACMA