

24 September 2011-09-24

Board of Chinese Medicine, Australia

Dear members of the Board

Submission : Grandparenting Regulation Standard - Transitional Arrangements For Qualifications September 2011.

My name is Damian Somerville qualified Traditional Chinese Medicine Practitioner.

As a practitioner of Traditional Chinese Medicine I am very happy that we will have a national governing body with a set of standards and guidelines we must adhere too. I am writing to you to make you aware of a concern I have with the current draft proposal as of September 2011.

The proposed draft criteria states that after 2008, people who have gained the qualification Advanced Diploma of Traditional Chinese Medicine will not be eligible for automatic registration. The focus of my concern is on the transitional period which will have a profound impact on people like me who graduated after 2008.

The recency of practice is for equal treatment in the transitional period without the additional burden of more exams, fees etc. The board has a key aim to protect the public and recency of practice is one method that is used to show that the graduate is fully qualified.

It is right to regulate safety and quality, however, graduates of Advanced Diploma courses (currently approved by government education accreditation bodies) post 2008 are held to a different standard by the board. The decision to upgrade to degree level has been known, yet 3 out of 4 of the major professional associations, the Australian Natural Therapist Association, Australian Traditional Medicine Society and the Federation of Chinese Medicine and Acupuncture Societies have accepted and continue to accept graduates of Advanced Diploma in Chinese Medicine from approved colleges as equal members to those with bachelor degrees.

In addition most insurance companies are willing to extend professional indemnities to practitioner members holding Advanced Diplomas in Chinese Medicine (Chinese herbal medicine and Acupuncture). Insurance companies which are highly risk adverse, would not have accepted such undertakings if these practitioners were in any way clinically incompetent. It seems an oversight of the board to impose unnecessary exacting burden on graduates with Advanced Diplomas after 2008 in the name of public safety when such a perceived threat has not been proved.

I have completed all the studies needed for the qualification, set up my own business, joined ATMS, have full insurance, pay my taxes. This will affect many people who graduated with the advanced diploma in 2009, 2010 and 2011 and have set up shops, business etc.

This proposal by the national registration board starting in 2012 seems unfair to penalise people like me who have studied the four years and completed the course and will now need to upgrade because we finished the course after 2008. If we had known this before we would have studied at a different University. We would have not wasted four years of time , money and energy.

Practitioners like myself are pleased with the standards being raised as proposed by the board but not in a manner detrimental to our existing businesses, take our lively hood away, and will disadvantage my current client base.

I hope that the board members will understand my concerns with the proposed regulation standards and give my submission consideration.

Kind Regards

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