

Tue 4/10/2011

Kristina Staats

Dear CMBA,

I am an accredited member of AACMA. I graduated as an acupuncturist in 1991 in Australia. I have read the proposed draft for national registration standards, and I am concerned with the proposal regarding grandparenting for practitioners attaining qualifications prior to 2008.

After viewing the recent addendum to Chinese Medicine Draft Standards Consultation Paper that has only just been published, I see that some changes have been made that, quite frankly give me cause for concern that I may not even be able to be registered come July 2012.

I am all for registration for the protection of the public, and understand you may be trying to weed out any charlatans, however I ask if you have truly thought this through regarding the legitimate, senior, Australian-trained practitioners that predate 2008 qualifications. It is important to remember that many of these legitimate seniors have much richness in their knowledge of the practical application of this profession that is certainly not gained by simply completing the current graduate degrees in TCM. It would be prudent to consider how you can maintain this quality of knowledge that only comes from many years practice when considering your draft.

Please explain to me also how practitioners of other health professions would not be expected to meet the same standards in regards to “adequate clinical training for practitioners” when a practitioner with 20 years experience in acupuncture would be grouped together in the same fashion as a new graduate in providing proof of their competency?

I would ask that you consider the following recommendations:

- * 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.

* The CMBA grandparenting standards must take into account non-practising members of the profession to enable them to obtain non-practising registration during the grandparenting period.

Sincerely,

Kristina Staats