

Sun 9/10/2011

Dear Board Members,

I hope this email finds you happy and well. We are writing to express our concerns regarding the recent draft for Registrations Standards in Acupuncture. My wife and I are qualified Acupuncturists and have been in practice and members of AACMA for the past 13 years. We feel the proposed current Grandparenting Standard is unjust and will adversely affect a large majority of experienced, professional and pioneering practitioners. We have outlined below some areas of contention and issues that require clarification and amendment.

We would like to bring your attention to the legitimacy of the National Grandparenting Standard as it imposes a higher standard to that demanded of the Victorian Registered practitioners whom under your proposal gain automatic registration into the National Scheme. Such an inconsistency cannot be ignored. There must be a uniform National Grandparenting Standard.

The addendum concerning "adequate clinical training" and "adequate practical training" for pre-2008 Qualifications is unreasonable. The Grandparent Standard and its Addendum should take into account the legitimate standards that applied at the time the individuals formal government accredited qualification was obtained. With the addendum as it stands it appears that no practitioner with pre-2008 qualifications will pass the Grandparent standards. Is this true? We urge the board to consider the large amount of practitioners this will affect. The logistical and economic repercussions of implementing these "Grandparent's" registration will be contrary to the Boards aim of "implementing policy reasonable in relation to the benefits achieved".

Please consider the thousands of Chinese Medicine Practitioners in Australia whom have invested time and money to study Government Accredited courses and for years have met the regulatory standards and financial obligations of Peak body Associations such as AACMA and in doing so held Professional Indemnity Insurance Policies and have been deemed 'safe' enough to be included in Private Health rebate schemes, yet under the new National Registration Standards this accounts for nothing. Careers and livelihoods are in jeopardy.

In all industries and professions there is nothing more valuable than experience. It is imperative that the traditional art of Chinese Medicine is protected by taking care of its 'Grandparents'. It is our hope that the National Registration has come about in order to protect the public. It is important to consider the ideas of public perception of the industry and not get caught up in standardised beauracracic rhetoric not relevant to Chinese Medicine practice. It is those 'Grandparent' practitioners that have actually treated thousands of paying clients, who have maintained successful businesses over many years that can tell you about what the public wants and not recently graduated (non-grandparent) practitioners. The public wants results, they want relief from their health concerns. It is word of mouth referrals, longevity in the industry and whether their private health fund will cover their treatments that drives the public. It is those practitioners that have 'survived' more than 4 years in the Acupuncture business that have earnt the right to serve the public without beauracracic judgement.

The AACMA has been a peak body for the industry and has set high, relevant and realistic standards within the industry for many years and we strongly urge you to consider its recommendations.

The Herbal Medicine draft standards raises many concerns not only for the many practitioners who have trained in Chinese Herbal Medicine and have attended many seminars and courses for continuing education and have successfully helped many clients with patent chinese herbal formulas but also the companies that manufacture these herbs and distribute them. Raising the standards above those already in place by the AACMA for Herbal Medicine dispensing is again going to be of a great cost to the community and to the practitioners that are able to supplement their income with the sale of these herbs.

The National Registration Standards Draft has many and vast possible repercussions that may actually destabilise the industry and undermine the profession and the public perception of it. Where one week a practitioner was deemed safe and professional, prescribing herbs, administering Acupuncture and actually helping people the next week their practise becomes illegal. What is the public to think of that?

We implore that the Board and the Government to consider registration from a humanistic view point and not only from an Academic mind set using standards not relevant to the "Traditional" art of Chinese Medicine.

Thankyou for taking the time to consider our concerns

Best Regards

Chantel and Geoff Sweeting