

Sun 9/10/2011

Dear AHPRA and CMBA members,

The following is our submissions in response to the consultation draft standards proposed by the Chinese Medicine Board.

Proposed Grandparenting Standard

We do not agree with the proposed grandparenting standard.

- 1) We strongly oppose any grandparenting standard that operates to retrospectively prevent current practitioners from states outside Victoria from registering to practice.
- 2) The proposed grandparenting standard is completely at odds with the objectives and concerns underpinning the AHPRA scheme.
- 3) The grandparenting standard with a cut off date of 31 December 2007 will cause considerable hardship to Advanced Diploma graduates and students.
- 4) The December 2007 cut off date for Advanced Diploma graduates was practised in the transitional scheme in Victoria – the only state where Chinese Medicine is regulated. The application of the same cut off date nationally unfairly disadvantages those living outside Victoria.
- 5) The prior to 2008 condition required of Advanced Diploma practitioners under the Grandparenting standard predates the existence of the regulation. Its retrospective nature is subject to legal challenge.

Recommendations

- 1) We recommend that the pre-2008 condition be removed from Advanced Diploma holders be allowed to register without restrictions or conditions under the Grandparenting scheme.
- 2) We recommend that the transition period be extended to enable current Advanced Diploma students who complete their qualifications up to 30 June 2017 to register under the Grandparenting scheme.

Yours truly,

Nicole Vardanega