

To Whom It May Concern:

My name is Hui Xu, and I am a past student of the Australian Institute of Applied Sciences (AIAS) in Brisbane, Australia.

On page 37 of the CMBA proposed registration standards consultation paper you were seeking advice on whether we agree with the qualifications standards.

Please let the record show that I vehemently object to the proposed grandparenting standard for two main reasons.

- 1) I have completed a government approved 'Advanced Diploma of Acupuncture' with AIAS. As with most advanced diploma courses throughout Australia that require 200-300 hours of clinical training, we were required to complete 300 hours of clinical training, which falls short of the 390 hours proposed by the CMBA draft. This potential discrimination will affect hundreds of past students from colleges and universities Australia wide (with the exception of students who studied in Victoria).

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 from AIAS.

- 2) Under the current CMBA proposal the biggest issue for any AIAS student that graduated after 2007 is that they will be ineligible for CMBA registration because they will not have completed five years of clinical practice. Now if the CMBA had proposed this back in 2005/2006 perhaps students and colleges/universities could have put contingencies into place to fast track students advanced diplomas to meet the deadline of 31<sup>st</sup> December 2007. However CMBA have only just released this proposal thereby alienating hundreds and hundreds of students that completed an accredited advanced diploma course. As far as I am concerned the cut-off date for completion of advanced diploma courses should be 30<sup>th</sup> June, 2012, which of course is the day before national registration starts. And to be honest, even that's a little unfair because the CMBA proposal is only just coming out now.

In addition, 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.

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 proposal in its current state effectively discriminates against every single student that has ever studied acupuncture at AIAS; since AIAS has been providing accredited acupuncture courses since 1994 that's a lot of students who have been unfairly victimised.

I hope that you take the content of this letter into consideration before finalising the CMBA registration standards. Thank you for your time.

Hui Xu  
Past student of AIAS  
Student Member of AACMA and ANTA

Mon 10/10/2011

Dear Chinese Medicine Board of Australia,

My name is Hui Xu. I am currently studying Advanced Diploma of Acupuncture in the Australia Institute of Applied Science and will complete by this year. I am a student member of AACMA. I understand Board released the draft registration standards in early September.

According to the draft grandparenting standard, as my qualification (Advanced Diploma) is awarded after 2007, only bachelor degree or higher qualifications will be considered adequate qualifications for registration.

In contrast, the Victorian board continued to recognise sub-degree programs until three years after the end of grandparenting (that is, for six years after the commencement of registration).

This means that I am not be eligible for registration on the basis of my qualification. I will be unable to apply under five years practice out of the last 10 years as I will not have five years practice. The only alternative, based on the draft registration standards, is that I undergo further training, or undertake other requirements approved by the CMBA.

My feedback to you is:

- 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;
- 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.

I am from a non-English speaking country, I would like to suggest CMBA that existing practitioners from a non-English speaking background should have their English language competence assessed as follows:

- self-assessment of competence based on a signed statutory declaration
- conduct of the practitioner's Chinese medicine practice primarily in English should be sufficient evidence of English language competence for grandparenting purposes;
- community/academic/professional engagement where the language of communication is English should be sufficient evidence of English language competence for grandparenting purposes;
- where a practitioner has passed a Chinese medicine examination conducted in English should be sufficient evidence of English language competence for grandparenting purposes.
- Where a practitioner conducts his or her practice in a language other than English and is otherwise unable to provide sufficient evidence of English language competence, then conditions may apply.

Thanks and regards,  
Hui Xu