

Mon 10/10/2011

Dear President and Committee Members of CMBA,

I am writing in response to the draft consultation paper published by the CMBA.

I graduated from the Sydney Institute of Traditional Chinese Medicine with an Advanced Diploma in Traditional Chinese Medicine in April 2007. Since then, I have been running an acupuncture/Chinese herbal medicine clinic at Chatswood where I have been developing my skills and amassing experience. Besides I demonstrate self-awareness and a commitment to continuous learning and personal career development by conducting ongoing industry research and completing a Bachelor of Health Science (Complementary Medicine) degree and a Master of Health Science (Traditional Chinese Medicine) degree concurrently.

Although it seems that I will be deemed a qualified practitioner based on the requirements on the consultation paper, there are areas of concern which the Board should carefully reconsider.

Professional associations such as AACMA have already applied strict standards when processing new membership applications and renewals. Existing practitioners who are members of these professional associations should automatically be deemed as legitimate practitioners. Also, most private health funds grant automatic provider registration to members from these professional associations. Many health funds regularly change their rules of provider recognition, practitioners who are currently recognised from the health fund listings should be the key indicator of whether they are legitimate. However, the draft standards might not have considered the above, and if these standards are endorsed, many legitimate practitioners might not be able to practise.

Therefore, it would be suggested that:

- The dividing line between pre-2008 and post-2007 qualifications should be removed;
- 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.
- self-assessment of English language 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.

Thank you for your consideration.

Yours sincerely,

Kenneth Yu

Acupuncturist / Herbalist