

9 October 2011

Members of Chinese Medicine Board of Australia,

I write to you to show my extreme concern over the Chinese Medicine Board of Australia (CMBA) proposed registration standards provided in your Consultation Paper (CP), dated September 2011.

After reading these proposed registration standards it became apparent that even though the CMBA has attempted to bridge the gap between its responsibility to the Australian public and to provide equal opportunity to the Chinese Medicine (CM) profession to maintain its income and market competitiveness, some of the standards in the proposal are in need of further consideration. In particular, I deem that the proposals of grandparenting and Professional Continuing Development (PCD) need to be amended.

Grandparenting:

Maybe if the proposed CP included a list of CMBA approved courses this may be avoided. However, without a list of approved courses, when accessing the CP, I disagree with the CMBA's requirements of 390 hours of supervised clinical training (SCT) for pre-2008 qualifications as none of those courses required that level of supervised clinical training and as such none of the graduates will meet your imposed requirements.

Instead of this mandatory requirement of 390 hours of SCT for pre-2008 qualifications, I believe all graduates of CM courses of at least three years duration, that have been in practice for at least 75% of the time since their graduation, and have maintained ongoing yearly professional development should be deemed acceptable for grandparenting.

Please find attached a list of such courses, as provided by the Australian Acupuncture and Chinese Medicine Association (AACMA).

Further, as there is a successful precedent in grandparenting in the Victorian registration process, I believe imposing higher standards for grandparenting for national registration to be unnecessary.

On a broader social context, it is the duty of health boards, such as the CMBA, to address public health determinants in their policy setting and this should involve cross sector advocacy. Direct public input seems to have been excluded to date. Additionally, the CP, through its grandparenting requirements, should take into account the rights of every Australian to achieve their health potential. Therefore, it should not exclude existing practitioners, as this restricts the public from their care; and the CMBA should endeavour to ensure that health services are equally distributed throughout the population and a significant decrease in the number of CM practitioners would not accomplish this.

This CM registration process provides an opportunity to create a health care landscape where socially marginalised groups can have access to a greater range of health services and be provided with a counterbalance to the unequal impact of health determinants that they are currently bound in. Limiting the number of registered providers to recent graduates, with less than four years experience outside of the student setting, and to those practitioners trained in overseas university hospitals will severely limit the potential of CM to assist the public.

PCD:

I disagree with two facets of the PCD proposed by the CP. Firstly, the CMBA's view that undertaking CM postgraduate university study does not apply to PCD. Secondly, the minimum of four hours allocated to Professional Issues (PI).

The four hour minimum is 20% of the required PCD, and with no provision for maximum hours, it would be possible for a registered practitioner to meet the PCD without developing any further knowledge in the field of CM. I propose a minimum requirement of only two hours for PI, with a maximum claimable PCD of six hours would be more suitable.

If the members of the CMBA would like to converse on these points, please contact the author via reply email, or phone (07) 3207 6642.

Yours sincerely

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**AUSTRALIAN PROGRAMS THAT SHOULD BE RECOGNISED FOR  
GRANDPARENTING PURPOSES  
PRELIMINARY LIST – 3 OCTOBER 2011**

**Note: This is in addition to the courses formally recognised by the CMRBV**

**ACCREDITED PROGRAMS/QUALIFICATIONS**

**PROVIDING INSTITUTION COURSE TITLE FOR REGISTRATION IN THE  
DIVISION(S) OF**

Academy of Traditional Chinese Medicine Australia Advanced Diploma of Traditional Chinese Medicine  
Acupuncture & Chinese herbal medicine  
Acupuncture Colleges (Australia) Bachelor of Applied Science (Acupuncture) Acupuncture  
Acupuncture Colleges (Australia) Diploma of Applied Science (Acupuncture) Acupuncture  
Australian College of Natural Medicine (all campuses) Bachelor of Health Science (Acupuncture) Acupuncture  
Australian College of Natural Medicine (all campuses) Advanced Diploma of Applied Science (Acupuncture)  
Acupuncture  
Australian College of Natural Medicine (all campuses) Diploma of Applied Science (Acupuncture) Acupuncture  
Australian Institute of Applied Sciences Advanced Diploma of Acupuncture (on-campus studies only)  
Acupuncture  
Endeavour College (all campuses) Bachelor of Health Science (Acupuncture) Acupuncture  
Gold Coast Institute of TAFE Advanced Diploma of Applied Science (Acupuncture) Acupuncture  
Melbourne College of Natural Medicine Bachelor of Health Science (Acupuncture) Acupuncture  
Melbourne College of Natural Medicine Advanced Diploma of Applied Science (Acupuncture) Acupuncture  
Melbourne College of Natural Medicine Diploma of Applied Science (Acupuncture) Acupuncture  
RMIT University Bachelor of Applied Science (Chinese Medicine/Human Biology) Acupuncture & Chinese  
herbal medicine  
Perth Academy of Natural Therapies Advanced Diploma in TCM Acupuncture & Chinese herbal medicine  
Southern School of Natural Therapies Advanced Diploma in TCM Advanced Diploma in TCM  
Sydney College/Institute of TCM Advanced Diploma of Traditional Chinese Medicine Acupuncture & Chinese  
herbal medicine  
Sydney College/Institute of TCM Diploma of Traditional Chinese Medicine Acupuncture & Chinese herbal  
medicine  
University of Technology Sydney Bachelor of Health Science in Acupuncture Acupuncture  
University of Technology Sydney Bachelor of Health Science in TCM (Acupuncture) Acupuncture  
University of Technology Sydney Bachelor of Health Science in TCM (Chinese Herbal Medicine Major)  
Chinese herbal medicine  
University of Technology Sydney Bachelor of Health Science in TCM (Dual Modality) Acupuncture & Chinese  
herbal medicine  
University of Western Sydney Macarthur Bachelor of Applied Science (Traditional Chinese Medicine)  
Acupuncture & Chinese herbal medicine  
Victoria University Bachelor of Chinese Medicine (Acupuncture & Herbs) Acupuncture & Chinese herbal  
medicine  
Victoria University Bachelor of Health Science - Traditional Chinese Medicine Acupuncture & Chinese herbal  
medicine  
Victoria University of Technology Bachelor of Health Science in TCM (Acupuncture) Acupuncture  
Victoria University of Technology Bachelor of Health Science in TCM (Chinese Herbal Medicine) Chinese  
herbal medicine  
Victoria University of Technology Bachelor of Health Science in TCM (Dual Modality) Acupuncture &  
Chinese herbal medicine