

Via email 25/5/2012

Dear sir/mdm

Below are my opinions in response to your questions:

**Is the requirement for at least 14 hours of CPD to be completed via formal activities reasonable and achievable?**

The 20hours of CPD set by CMBA was good. Of the 20 hours CMBA has indicated that 4hours must be related to professional issues (example given by AHPRA staff during the information night was by attending the information night was consider 4hours of CPD training related to professional issue), which is reasonable. The requirement of at least 14 hours of CPD to be completed via formal activities and if the so call "Formal activities" refer to physically attending TCM related seminar or TCM courses, then I feel it is NOT practical. Bear in mind that there are some TCM Physicians who have their practice in rural or more deserted area. Usually in Non-metropolitan area population is much lesser, practitioners are just making a minimum/sufficient enough of earning to cover their cost and make a living. They will not be able to survive coz much money need to spend in maintain the TCM license if the Board requirement of 14hours of formal activities refer to physician physically attending seminars. A TCM related seminar in Australia usually is extremely costly (which I feel is wrong if the authority or association is really supportive for CPD) e.g. the seminar by AACMA in May2012 at Brisbane Conventional centre entry cost AUD\$900. This amount of Entry fee is far too expensive than a return ticket to any Asian countries to attend TCM related seminar. The Jetstar has recently promotion fair to some Asian countries at the price of only AUD\$99. Unfortunately the TCM related seminar in Asians are usually in mandarin, which the Australian practitioners are, not be able to understand and therefore not able to go for Cheap BUT Good TCM related seminar in Asia unless he/she understand mandarin. I heard that there is also TCM trade fair during the seminar but the trade fair is also open to TCM professional Only (which I feel is inappropriate, not wise to set such a rule). I saw in Asia countries when they have TCM seminar they also have TCM trade fair which is free admission and OPEN to Public. The reason for them to have the trade fair open to public is to also educate the public on TCM knowledge as well.

I also saw in some Asia countries in some industries where the govt is pushing the certain industry professional for CPD, the authority take

imitative to organise annual CPD seminar/workshop. In order to attract the professional to actively engage in CPD the cost for the seminar was very heavily subsidised by the govt and the seminar was held in 5-6stars hotel inclusive of delicious lunch & tea break. Participants need to pay just \$20. The speakers for the seminar were from all over the world famous educators. I saw their TCM Association organised seminar by World Federation Of Acupuncture at 6stars hotel, seminar fee was only charge at \$200

Hence, I really feel if CMBA is really serious on CPD then CMBA should take the lead, organised quality TCM seminars and subsidised the TCM seminars make it affordable and easily available to TCM practitioners in Australia.

I also feel that CMBA should have an open mind in setting the requirement for CPD. Technology is very advanced nowadays. CPD should include those internet search on TCM matters, TCM related papers, news, treatments method etc. Allow the practitioners to record down the number of time they spend in the internet searching on TCM related matters.

I propose to keep the 4hours of CPD training related to Professional issue, as the formal activity is good enough. The rest of 16 hours pls allow practitioners to complete via internet surfing, reading of TCM books/video/audio, perform volunteer TCM treatment to the community.

**Are the examples of CPD activities clear and unambiguous? Is 5 years a reasonable time to retain CPD records?**

5 years to retain CPD records is too long. The rental space and cost for TCM clinic in city area are small and expensive. Even if a city TCM practitioner is willing to move the old records to his/her home not forgetting the city housing condition is usually small and expensive.

I would like to propose 2 years.

Thank you

Yours sincerely

M.