

To Whom It May Concern:

My name is David Hartmann and I am the 'Head of the Traditional Chinese Medicine Department' at the Australian Institute of Applied Sciences (AIAS) in Brisbane, Australia, as well as being a 'Fellow' of the Australian Acupuncture and Chinese Medicine Association (AACMA).

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

I would like to separate my response into two parts; the first being 'Members with pre-2008 qualifications', and the second 'Members who graduated after 2007'.

### **Members with pre-2008 qualifications**

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. This is particularly relevant for AIAS which has offered both the Diploma of Applied Science – Acupuncture (1994-1997) and the Advanced Diploma of Acupuncture (1997-present). Both of these courses have been government accredited.

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. Again this is particularly relevant for AIAS which has both the diploma and advanced diploma on the AACMA list.

At the end of the day the biggest issue for AIAS is that our three year full-time advanced diploma required the students to complete 300 hours of clinical training, which falls short of the 390 hours proposed by the CMBA draft. It is worth noting that 200-300 hours of clinical training has been a perfectly legitimate standard for advanced diploma students, so to discriminate against these graduates is extremely unfair, especially for those colleges and universities that operate outside of Victoria.

### **Members who graduated after 2007**

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.

Under the current CMBA proposal the biggest issue for AIAS students that have graduated after 2007 is that they will be unable to apply for CMBA registration because they will not have completed five years of clinical practice; yet they have completed a government accredited advanced diploma of acupuncture. And this would apply to any student from other institutions throughout Australia.

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 this letter gets the attention that I believe it deserves. Thank you for your time.

David Hartmann

Head of TCM Department at AIAS  
Fellow of AACMA

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