



Federation of Chinese Medicine &
Acupuncture Societies of Australia Ltd.
澳洲全國中醫藥針灸學會聯合會 (National Body)

FCMA

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Professor Robyn Ward

Chair, Medical Services Advisory Committee
MSAC Secretariat through HTA Access Point
Australian Government Department of Health
MDP 851, GPO Box 9848, Canberra ACT 2601

6 September 2016

Dear Professor Ward

We write to you jointly as representatives and office-bearers of three of the four major professional associations representing Chinese medicine practitioners in Australia. These are the Federation of Chinese Medicine & Acupuncture Societies of Australia (FCMA), the Australian Natural Therapists Association (ANTA) and the Australian Traditional Medicine Society (ATMS). Unfortunately, the fourth association, the Australian Acupuncture and Chinese Medicine Association (AACMA) has not agreed to collaborate, as has been the case historically on other matters, and they may well send in their own letter. Our three associations are likely to represent well over half of the registered Chinese medicine practitioners in Australia, however, and represent three of the four associations that form the Chinese Medicine Reference Group for Australian Health Practitioner Regulation Agency (AHPRA) (the FCMA is the lead organisation this year, and the lead organisation rotates on an annual basis). We request consideration of an application for registered acupuncturists regulated by nationally consistent legislation under the National Registration and Accreditation Scheme and registered under AHPRA to have access to existing acupuncture items under the Medicare Benefits Schedule (MBS) and therefore provide acupuncture services under Medicare. Currently, there are five Medicare Item numbers relating to

acupuncture services. These are MBS Item numbers: 173, 193, 195, 197 and 199. The current legislation relating to Medicare allows for only appropriately qualified medical practitioners ('medical acupuncturists') to be able to provide acupuncture services under Medicare and charge these Medicare Item numbers. However, as you are aware, the profession of Chinese medicine became nationally regulated under AHPRA in 2012. Previously, only the state of Victoria had statutory regulation of Chinese medicine. Now that there is national registration, there is no logical reason why AHPRA-registered acupuncturists should not also be able to provide acupuncture services under Medicare.

The Chinese Medicine Board of Australia, like the other practitioner boards set up under AHPRA, has set AHPRA approved education standards for the purposes of registration as acupuncturists. The minimum acceptable education standard is a (4 – 5 years full-time study) Bachelor degree. Registered acupuncturists are therefore highly trained professionals and arguably, the length of training for Chinese medicine-trained acupuncturists is significantly longer than medical acupuncturists training. Importantly, changing the legislation to allow registered acupuncturists to provide acupuncture services under Medicare provides consumers with greater access to highly qualified acupuncture practitioners allows consumers choice of practitioner.

We thus attach an application to include AHPRA-registered acupuncturists as providers of the current Medicare Item numbers (173, 193, 195, 197 and 199) in addition to medical acupuncturists.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tzi Chiang Lin', with a stylized flourish at the end.

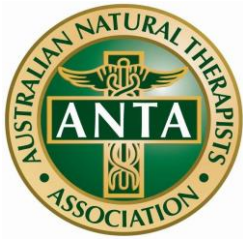
Professor Tzi Chiang Lin

National President, Federation of Chinese Medicine & Acupuncture Societies of Australia (FCMA)



Mr Brian Coleman

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Ms Betty Tannous

President, Australian Traditional Medicine Society (ATMS)

