



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 Team](#)

Australian Government Department of Health

MDP 960

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Canberra ACT 2601

10 February 2021

Ref: Application for amendments to MBS acupuncture items 173,193-199

Dear Professor Ward

The *Federation of Chinese Medicine & Acupuncture Societies of Australia Ltd* (FCMA) requests a review of existing *Medicare Benefits Schedule* (MBS) acupuncture services and seeks for inclusion of Registered Acupuncturists (acupuncturists registered under the Chinese Medicine Board of Australia, [CMBA]) into the MBS. This is not a request for a new service but is simply a request to allow registered acupuncturists access to the existing MBS acupuncture items currently available only to those medical practitioners endorsed by the Medical Board of Australia (MBA) to practice acupuncture ('Endorsed Acupuncturist' or 'qualified medical acupuncturist'). Alternatively, new item numbers could be created to achieve the same result.

Currently, MBS items 193, 195, 197 and 199 include Endorsed Acupuncturists with only 270 hours of acupuncture study; yet do not include Registered Acupuncturists who

have completed over 2,000 hours of study in acupuncture. In addition, item 173 has no acupuncture training criteria and allows any medical practitioner to practise acupuncture within the MBS.

When these MBS acupuncture items were created, Chinese medicine profession was not a nationally regulated profession under the *Australian Health Practitioner Regulation Authority* (Ahpra). It has now been regulated nationally since 2012. As advised by the Australian Government Department of Health dated 14 May 2019 (Ref No. MC19-004201), that an application should be made to the Medical Services Advisory Committee (MSAC), we are thus asking for this inequitable arrangement to be rectified.

Put very simply, the Australian public must be provided with the best available treatment: acupuncture treatment delivered by a Registered Acupuncturist has greater clinical benefit yet costs no more than that delivered by an Endorsed Acupuncturist. Furthermore, should expenditure be of concern, MBS acupuncture rebates could be capped by placing a limit of rebated treatments per patient.

Should you have any further query with matter, please feel free to contact me.

Yours sincerely,

Professor Tzi Chiang Lin PhD

President, FCMA

Encl:

1. Application form: Amendments to MBS acupuncture items 173,193-199
2. Statement of Clinical Relevance issued by the Chinese medicine and acupuncture associations in Australia (Attachments 1, 2 and 3)
3. Letter of Support from the Consumer Group (Attachments 4 and 5)
4. Response from the Minister for Health 14 May 2019