



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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31 March 2021

Attention: Executive Officer, Medical Board, AHPRA,

GPO Box 9958, Melbourne Victoria 3001

Email: [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Dear Executive Officer,

Ref: Consultation on the draft revised standard for acupuncture endorsement for registered medical practitioners

The Federation of Chinese Medicine & Acupuncture Societies of Australia Ltd (the FCMA) is pleased with the opportunity to respond to the Medical Board of Australia (MBA) regarding the consultation on the draft revised standard for acupuncture endorsement for registered medical practitioners. The FCMA is a national association that advocates for the Chinese medicine profession, supports practitioners, and makes regular submissions on behalf of the profession to government and regulatory agencies.

The FCMA welcomes the review of the standards for acupuncture for medical practitioners and looks forward to improvements to the requirements for acupuncture endorsement for registration of medical practitioners. In the current document dated 8 February 2021, it is clearly stated that the MBA is not proposing any substantial change to the existing requirement.

#### Endorsement and Registration

On careful review of the document, the FCMA has concerns over endorsement for acupuncture for medical practitioners; and registration by the MBA that allows practitioners to use the protected title of “acupuncturist”. Regarding endorsement for registration to practice acupuncture, we believe that the Chinese Medicine Board of Australia (CMBA) to be the appropriate agency to grant the endorsement and not the MBA. The CMBA should be the

standard and reference for competency and safety for acupuncture practice rather than the MBA. After all, the MBA would definitely not agree to medical practitioners to be endorsed by any other national board as medical practitioners other than the MBA itself. Although the National Law has empowered every National Boards to endorse their registrants to use acupuncture title under the National Registration and Accreditation Scheme (NRAS) which aims to uniform the registration standards across the country, the FCMA has appreciated that the Physiotherapy Board of Australia,<sup>1</sup> the Podiatry Board of Australia,<sup>2</sup> the Chiropractic Board of Australia,<sup>3</sup> and the Osteopathy Board of Australia,<sup>4</sup> have given up their endorsement powers and encouraged their registrants to apply for acupuncture registration through the CMBA if their respective practitioners have adequate acupuncture qualifications. The FCMA agrees that, in line with other regulated health professions under the NRAS, for medical practitioners to use the protected title of “acupuncturist”, the medical practitioner should be registered with the CMBA; and, again, not to be endorsed for acupuncture by the MBA.

### Course Accreditation

The FCMA also has concerns over the length of the acupuncture course approved by the MBA for medical practitioners. In the MBA website, the Australian Medical Acupuncture College (AMAC) offers an acupuncture course for medical practitioners to enable medical practitioners to be endorsed to practise acupuncture.<sup>5</sup> The CMBA accredits a postgraduate course offered by the Royal Melbourne Institute of Technology (RMIT) University, enabling health practitioners to be registered and to be able to use the protected title of “acupuncturist”.<sup>6</sup> This course offered by the RMIT University is open to all healthcare practitioners including medical practitioners.<sup>7</sup> The common criterion is that both the AMAC course and the RMIT University courses are available to practitioners who are already graduates in their own fields/specialties. It is obvious that the AMAC course is exclusively for medical practitioners (and for dentists), being the only accredited course on the MBA website and that the practitioners do not need to consider other offerings as requirement for endorsement to practice acupuncture. The course offered by the AMAC is not in the CMBA website, suggesting that it is not recognised by the CMBA for acupuncture. Comparing the two courses offered by the AMAC and by the RMIT University shows vast discrepancies. The AMAC course offers a Part 1 course in acupuncture, consisting of 60 hours of

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<sup>1</sup> <https://www.physiotherapyboard.gov.au/Search.aspx?q=endorsement+of+acupuncture> accessed on 29/03/2021

<sup>2</sup> <https://www.podiatryboard.gov.au/Registration-Endorsement/Endorsement-for-acupuncture.aspx> accessed on 29/03/2021

<sup>3</sup> <https://www.chiropracticboard.gov.au/registration/endorsement.aspx> accessed on 29/03/2021

<sup>4</sup> <https://www.osteopathyboard.gov.au/Registration-Standards/FAQ.aspx> accessed on 29/03/2021

<sup>5</sup> <https://www.medicalboard.gov.au/Accreditation/Approved-programs-of-study-for-acupuncture-endorsement.aspx> access on 22 March 2021

<sup>6</sup> <https://www.chinesemedicineboard.gov.au/Accreditation/Accredited-programs.aspx> access on 22 March 2021

<sup>7</sup> <https://www.rmit.edu.au/study-with-us/levels-of-study/postgraduate-study/masters-by-coursework/master-of-applied-science-acupuncture-mc024> access on 22 March 2021

webinars/lectures, 180 hours of self-directed learning, and 30 hours of clinical practice (made up of two weekends of mentorship and supervised clinical practice); totalling 270 hours.<sup>8</sup> The Master of Applied Science (Acupuncture) offered by the RMIT University consists of 234 hours of theory and practice, and 234 hours of clinical supervision and mentorship; totalling 468 hours. This course is recognised by the CMBA, but the course offered by the AMAC is not. There is significant difference between 30 hours of practicum offered by the AMAC and 234 hours of practicum offered by the RMIT University. The discrepancy in the hours of mentorship and supervised clinical practice between the two courses is alarming.

The FCMA stays on its longstanding belief that medical practitioners who intend to be endorsed for acupuncture practice, or be registered as acupuncturists to be able to use the protected title should meet the requirements of the CMBA and to be endorsed or registered by the same. This is to maintain consistency in standard, competence and public safety. It is inconsistent for the MBA to endorse medical practitioners for acupuncture and to register practitioners who wish to use the protected title. If the MBA is able to endorse practitioners for acupuncture and as well as to register practitioners, enabling the use of the protected title, this would create double standards in the practice of acupuncture. This also suggests double standards being agreed to by the Australian Health Practitioners Registration Agency (AHPRA) in favour of the MBA.

#### Recency of Practice

In draft attachment A: Draft revised registration standard, it is noted that there is no minimum hours required for recency of practice for a medical practitioner to meet the requirements for renewal of endorsement for acupuncture practice. This is necessary to maintain skills and currency for continuation for practice.

#### Requirements to Resume Practice

In draft attachment A: Draft revised registration standard, there is also no statement, as to the length of time that a practitioner might be away from practicing acupuncture without having to fulfil certain requirements to be able to resume practice. The FCMA believes that the requirement is necessary as there could be situation/s where medical practitioners may choose not to, or may not be able to practice acupuncture for legitimate reasons. This provides the practitioner a smooth pathway back to practice and to ensure competency.

In summary, the FCMA suggests the following recommendations for the safety of public:

1. That the CMBA be the agency to accredit all acupuncture courses.
2. That the CMBA be the agency to endorse or to register all acupuncture practitioners.

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<sup>8</sup> [https://amac.org.au/education/?course\\_id=70](https://amac.org.au/education/?course_id=70) access on 19 March 2021

3. That the number of hours to be clearly stated in the final draft to meet the requirements for renewal of endorsement or registration.
4. That the acceptable length of time be clearly stated for a practitioner could away from acupuncture practice without having to forfeit endorsement or registration to resume practice.

The FCMA hopes that the MBA would consider the recommendations mentioned above.

Yours sincerely,

Prof. Tzi Chiang Lin PhD

President, FCMA

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