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11/220

Dr Joanne Katsoris
Executive Officer
Medical Board of Australia
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Dear Dr Katsoris

Consultation – Endorsement for Acupuncture

Thank you for the opportunity to comment on the proposed registration standard for endorsement of acupuncture.

Approved qualifications for medical acupuncture

The AMA acknowledges that the Medical Board of Australia has already approved qualifications for endorsement for medical acupuncture, being the Graduate Certificate in Medical Acupuncture (Monash University) or the Australian Medical Acupuncture College course.

The AMA supports the Board's proposal for the Australian Medical Council to accredit programs of study for endorsement for acupuncture. We look forward to being involved in this process, which will demonstrate that medical acupuncture is superior to acupuncture performed by other health practitioners.

Grandfathering

The AMA supports the Board's proposed grandfathering arrangements for those medical practitioners who do not hold approved qualifications and who have been providing acupuncture services between 1 July 2010 and 30 June 2012.

Prior to the introduction of national registration, these medical practitioners performed acupuncture without having to meet any requirements imposed by the former state based medical boards. As there have been no safety concerns for patients in these circumstances, there is no reason not to endorse their registration for acupuncture.

We support the proposal for these medical practitioners to have until 30 June 2015 to apply for endorsement.

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We support the proposed grandfathering arrangements for medical practitioners who have been accredited by the Joint Consultative Committee on Medical Acupuncture (JCCMA) for Medicare benefits purposes.

For medical practitioners who have not been accredited by the JCCMA and who have been claiming Medicare items:

- The proposal for them to demonstrate claiming for more than 25 Medicare acupuncture items (items 173) in the period 1 July 2010 to 30 June 2012 is a reasonable service level. I would make the observation that the claiming of at least one Medicare acupuncture item would be a sufficient demonstration of recency of practice, given the very low risk medical acupuncture presents to patient safety.
- We do not support the proposal that these practitioners have to demonstrate completion of continuing profession development (CPD) in the period 1 July 2010 to 30 June 2012. Prior to the introduction of national registration, these medical practitioners performed acupuncture and billed Medicare for their services without having to meet any CPD requirements imposed by the former state based medical boards or the Medicare benefits arrangements. It is not reasonable to retrospectively impose a CPD requirement in these grandfathering arrangements.

Continuing Professional Development

The AMA supports the proposal for medical practitioners, whose registration is endorsed for acupuncture, to complete CPD in acupuncture to maintain endorsement.

However, the AMA would prefer that the requirement for completion of an additional 10 hours per year if the practitioner's college CPD program does not include acupuncture be delayed so that colleges can include acupuncture in their CPD programs. Again it is unfair to require some medical practitioners to undertake 60 hours of CPD, simply because their college has not had sufficient time to prepare for the Board's requirement.

In general, the AMA is pleased that the Board has carefully considered the AMA's earlier correspondence and proposals on endorsement for acupuncture, and that the draft registration standards reflect our views.

Yours sincerely



Dr Steve Hambleton
President

14 May 2012