

In Reply to the consultation paper on the proposed registration standard for endorsement of Acupuncture

(Medical practitioners who wish to use the title “acupuncturist” must either have their registration endorsed for acupuncture by the Medical Board of Australia or be registered by the Chinese Medicine Board of Australia.

Medical practitioners with general and/or specialist registration can apply for endorsement of registration for acupuncture if:

1. they hold an approved qualification in acupuncture)

What will the approved qualification be?

A standard for practitioners who wish to use the title “Acupuncturist” has been set by the Chinese Medicine Board of Australia.

Will the standard set by the Medical Board for Doctors who wish to use the title “Acupuncturist” be equivalent, higher, or lower than the one already established.

The Standard set by the Chinese Medicine Board of Australia, MUST be the Minimum required

If lower, then why?

How will the public know that there are two different standards for a Practitioner who uses the title “Acupuncturist”

Does the Medical Acupuncture course, and therefore qualifications, enable the doctor to be **competent** to provide the **full range of acupuncture services**

a. Physical -

Muscular/skeletal

1. Sprains
2. Strains
3. Back (lower and/or upper), neck, shoulder hips, knees (sciatica, torticollis,
4. Frozen shoulder, etc.

b. Medical.

1. Dermatological, (Psoriasis, eczema, boils, acne, sunburn, vitiligo, alopecia etc)
2. Gynecological, (hormonal, infertility, dysmenorrhoea, amenorrhoea, lactation, threatened or unexplained recurrent miscarriage, endometriosis etc.)
3. Endocrine, (Hashimoto's, graves disease, etc)
4. Gastrointestinal, (IBS, Chron's disease, celiac, diarrhoea, constipation, heartburn, indigestion, poor assimilation of food, under/over acid stomach,
5. Immune (viral, bacterial, fungal, improve immune function, etc.)
6. Autoimmune (Arthritis in its many forms, SLE, Sarcoidosis, etc)
7. Respiratory, (Allergies, hay fever, sinusitis, Rhinitis, viral, bacterial, asthma, bronchitis, pneumonia, emphysema, etc)
8. ENT (tinnitus, glue ear, poor hearing, tonsillitis, sore throat (viral/bacterial), voice problems, etc)
9. Urogenital, (UTI, impotence, male infertility, bed wetting, incontinence, prostatitis, undiagnosed kidney/bladder pain, etc.)

10. Cardio/vascular. (hypertension, hypotension, V.V. cholesterol, non life threatening chest pains, poor circulation, cold/hot feet/hands, haemorrhoids, restless leg syndrome,
11. Miscellaneous. (Migraines, headaches, vertigo, poor memory, poor concentration, insomnia, nightmares, tiredness, lethargy addictions (smoking, gambling drug use, etc)
12. Pediatrics. ADD, ADHD, projectile vomiting etc.)

c. **Emotional,**

1. excessive joy
2. excessive sympathy
3. grief
4. anger/frustration
5. excessive fear
6. poor self esteem
7. low confidence
8. anxiety,
9. stress (in its many forms)

d. **Life style**

Whilst an acupuncture needle may not necessary be used for life style, this forms an important aspect of any Acupuncture treatment, educating the patient to prevent conditions, this may include advising the patient on Tai Chi, or breathing techniques, posture,

A doctor who wishes to use the title “Acupuncturist must be competent to provide the **full range of acupuncture services** to a member of the public who consults them for such a service. This would be expected to include the differential diagnosis of the person's many conditions/ailments and the design of a treatment specific to the person's conditions, as well as the safe insertion, manipulation, removal and disposal of needles.

2. if they do not have an approved qualification but have general and/or specialist registration and:
 - a. have been accredited by the Joint Consultative Committee on Medical Acupuncture for acupuncture prior to 30 June 2012 and have complied with the continuing professional development requirements for medical acupuncture for the previous triennium and/or

The same regulation and standards would still have to apply to those who fall into category 1

2 b. have been practicing acupuncture in the 24 months from 1 July 2010 to 30 June 2012, as evidenced by a minimum of 25 relevant Medicare claims in that period and have undertaken relevant CPD in acupuncture over that period of time.

"A Minimum of 25 Acupuncture treatments over a 24 Month period " is totally insufficient number of treatments to have been performed to prove that they are competent in the safe and effective use of Acupuncture

The minimum number of treatments for a professional GP with no Acupuncture qualification who wishes to be granted the privileges of being able to use the title "Acupuncturist" should be a minimum 1000 Treatments over a 24 months period.

The medical Board must be aware that if they grant endorsement to Doctors to use the title "Acupuncturist", the Doctor must **be competent** to provide the **full range of acupuncture services** to a member of the public who consults them for such a service. This would be expected to include the differential diagnosis of the person's many conditions/ailments and the design of a treatment specific to the person's conditions, as well as the safe insertion, manipulation, removal and disposal of needles. If the person/s that they grant endorsement is not **be competent** to provide the **full range of acupuncture services** to a member of the public who consults them for such a service. This would be expected to include the differential diagnosis of the person's many conditions/ailments and the design of a treatment specific to the person's conditions, as well as the safe insertion, manipulation, removal and disposal of needles. Members of the Medical Board may find themselves being investigated by the ACCC and may face criminal prosecution, irrespective of what qualification they may hold or what course that the Doctor did.

Therefore, the Medical Board of Australia will need to look into the courses being provided to Doctors to ensure that Doctors are fully competent in the full range of Acupuncture services.

If a member of the public wishes to see a Doctor who is entitled to use the term "Acupuncturist" for Acupuncture treatment, then the Doctor must use Acupuncture, the patient is entitled to question the Doctor as to their diagnosis, and their treatment plan, the reason for the points selected, and an explanation of point function. (That person may be a registered Acupuncturist)
If the Doctor is unable to do Acupuncture for the conditions presented, then, they may be sued for false Advertising. The Medical Board may also be held legally reasonable.

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