

# Individual responses (I-Q) to the Chinese Medicine Board of Australia public consultation on the revised Guidelines on infection prevention and control for acupuncture and related practices

## Response from Jane (Shen Jian) Ma

(Note: All responses have been reproduced as provided and have not been edited or otherwise altered.)

### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures.

We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

Australian Health Practitioner Regulation Agency  
National Boards

GPO Box 9958 Melbourne VIC 3001 [Ahpra.gov.au](http://Ahpra.gov.au) 1300 419 495

Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry and psychology.

**Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.**

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

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Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

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CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

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## Response from Ji Huang

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## Response from Jian Jiang

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Page 4 Errors in the list of Contents: eg 2.6 Waste management and handling of linen? Sharps disposal containers? 3 Use of personal protective equipment?

Page 9 It is said: • Antimicrobial soaps are used to decontaminate hands however, when alcohol-based hand rub is available in the healthcare facility for hygienic hand antisepsis, the use of antimicrobial soap is not recommended. Does this mean when hand hygiene is performed with soap and water, the alcohol-based hand rub must be followed. If yes, please make it clear here, because in 2.1 Hand Hygiene section, it is always mentioned that practitioners perform hand hygiene, using soap and water, or an alcohol-based hand rub.

Page 13 in Table 3. It is listed that • Cups (glass or plastic), gua sha tools (such as scraping spoons) and other equipment that has come into contact with blood or non-intact skin are to be treated as semi-critical items.

If contaminated, semi-critical items can be reused after being reprocessed consistent with the requirements of the Australian Standards AS/NZS 4815:2006 for office-based practices and AS/NZS 4187:2014 for larger health facilities. For practitioners, it is always a question how to reprocess the glass cups that have come into contact with blood. It is better to explain clearly here the requirements of Australian Standards AS/NZS 4815:2006 for office-based practices to practitioners who work as sole practitioners either alone in a clinic or in a shared clinic arrangement and need clear statements of the Board's expectations. Also instead of mention of Bamboo cups, plastic cups which are used much more should be listed in the table.

Page 16 in the section of Aseptic technique, requirements for supporting long needle insertion should be listed here as they are closely relevant to this topic.

Page 17 The detergent mentioned here for routine cleaning: Can any requirement for detergent be specified here? or any detergent?

Page 19 it is said that Unless specific state or territory waste management requirements apply, the Board expects clinical waste (such as used swabs) that does not contain expressible blood to be treated as general waste. It is better to specify how to manage the clinic waste that does contain expressible blood.

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A little bit too much

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## Response from Jian Shi

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The most important comment I can make to the Board:

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## Response from Jianchao Chen

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Too much

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## Response from Jianfeng Liu

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The promotion of soap and water for hand hygiene shyness equal with alcohol based hand rubs. We recommend to wear gloves rather than dressing if they have cuts, abrasions and other skin conditions. Expect to wear short sleeved clothing is not an appropriate especially in cold area.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

### Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

### Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?

**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

We hope the board to help Practitioners to gain equal rights as other Allied health professions

## Response from Jiazhen Yang

(Note: All responses have been reproduced as provided and have not been edited or otherwise altered.)

### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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All healthcare practitioners who wish to practice acupuncture should be registered under CMBA in the form of full registration or undertakings, and be regulated under the same set of rules as other acupuncturists registered with CMBA.

We also expect the Board to seek consultation in dry needling regulation to protect public.

## Response from Juliana Chang

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

I do not find any missing apart from the concerned issues mentioned above.

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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## Response from Jun Wen Li

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

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No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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## Response from Junyu Zhou

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

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**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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## Response from Junzeng Xin

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

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**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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## Response from Kang Xiao Li

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

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No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

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**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

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**Question Eight: Do you have any other comments?**

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## Response from Kanglin Liu

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### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

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#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures.

We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water.

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

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#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

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### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

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**Question Eight: Do you have any other comments?**

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## Response from Libin Tian

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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All healthcare practitioners who wish to practice acupuncture should be registered under CMBA in the form of full registration or undertakings, and be regulated under the same set of rules as other acupuncturists registered with CMBA.

We also expect the Board to seek consultation in dry needling regulation to protect public.

## Response from Lingsheng Zhang

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

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## Response from Liping Yu

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No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures.

We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water.

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

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Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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We also expect the Board to seek consultation in dry needling regulation to protect public.

## Response from Lisa Xu

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

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No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

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The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

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#### 3 Cuts, abrasions and other skin conditions

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### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

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**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

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## Response from Lu Fang

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Response provided to the question: Is the level of detail too much, too little, or about right?

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### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

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## Response from Luke Lu

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#### 3 Cuts, abrasions and other skin conditions

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We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

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### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

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**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

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## Response from Man Zhang

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Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

N/A

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

N/A

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

N/A

### Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

N/A

### Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

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N/A

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?

N/A

**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water. The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents. We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties. Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

The most important comment I can make to the board:

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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We also expect the Board to seek consultation in dry needling regulation to protect public safety as realistically, dry needling is a form of acupuncture.

## Response from Mei Chen

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

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#### 4 "Jewellery, watches, fingernails and clothing"

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### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

The level of detail is too much.

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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We also expect the Board to seek consultation in dry needling regulation to protect public.

## Response from Min Xue Xu

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

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**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

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## Response from Ming Liu

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?

CMBA should provide a Chinese version for the revised guideline. Please Do not forget you are playing with Chinese Medicine.

**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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All healthcare practitioners who wish to practice acupuncture should be registered under CMBA in the form of full registration or undertakings, and be regulated under the same set of rules as other acupuncturists registered with CMBA.

We also expect the Board to seek consultation in dry needling regulation to protect public.

## Response from Miu Yin

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

Too much

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

Too much

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

Yes

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?

bilingual - english and chinese

**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

"As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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All healthcare practitioners who wish to practice acupuncture should be registered under CMBA in the form of full registration or undertakings, and be regulated under the same set of rules as all the acupuncturists registered with CMBA.

We also expect the Board to seek consultation in dry needling regulation to protect public. Dry needling should be registered and consulted under acupuncturist and should not be separated as its own entity.

## Response from Monika Kemp

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water.

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

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**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. Five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

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**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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We also expect the Board to seek consultation in dry needling regulation to protect public.

## Response from Niannu Zhang

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

The draft revised CMBA guidelines have some issues.

#### 1 "Use of alcohol-based rubs"

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

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#### 2 "Washing with soap and water."

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

The level of detail is too much.

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

yes. five years is reasonable.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

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**Question Eight: Do you have any other comments?**

**Response provided to the question: Do you have any other comments?**

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## Response from Qin Xu

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

No. The current guidelines is all good.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

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Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water."

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#### 3 Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents.

We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

#### 4 "Jewellery, watches, fingernails and clothing"

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties.

Although we agree with the Board the importance of infection control, it is not practical to forcefully order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

No

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

Yes, the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture.

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

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**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?

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**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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## Response from Qingju Wang

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### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

I have two concerns. First, I do not understand the rationale why “herbs” is changed to “medicinal ingredients”. Herbs has its specific meanings while medicinal ingredients only refers to part of the information contained by herbs. Second, acupuncturist is not allowed to wear long sleeve shirt while practising. I do not agree with this new rule. We have been practising for many years and the infection risk from TCM practitioners are so rare.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?

I do not see any necessary to revise the old version.

### Question Three: Is the level of detail too much, too little, or about right?

Response provided to the question: Is the level of detail too much, too little, or about right?

About right

### Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.

Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?

No, already too many regulations

### Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?

No

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?

My opinion is only to update the guideline if there is practical reasons.

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?

Please consult the profession for any change.

**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?

Nope

## Response from Qun Ying Huang

(Note: All responses have been reproduced as provided and have not been edited or otherwise altered.)

### Question One: Are there any specific issues or effects from applying the current guidelines? If so, what are they?

**Response provided to the question: Are there any specific issues or effects from applying the current guidelines? If so, what are they?**

Practitioners are expected to perform hand hygiene before/after touching the patient/procedures. We do not agree with the statement that: "Alcohol-based hand rubs are considered better than traditional soap and water.

The statement may be misleading. The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs especially when the practitioners feel their hands are sticky after multiple use of alcohol-based hand rubs.

### Question Two: Is the content and structure of the draft revised guidelines helpful, clear, and relevant? If not, please explain why.

**Response provided to the question: Is the content and structure of the draft revised guidelines helpful, clear and relevant?**

Washing with soap and water.

The promotion of soap and water for hand hygiene is equally important and should be used in hybrid with alcohol-based hand rubs.

### Question Three: Is the level of detail too much, too little, or about right?

**Response provided to the question: Is the level of detail too much, too little, or about right?**

Cuts, abrasions and other skin conditions

The Board expects all registered practitioners to cover any cuts and abrasions on their hands with waterproof dressings, to reduce the risk of cross-transmission of infectious Agents. We recommend the practitioners to wear gloves if they are using any dressings as the dressing may impact the effectiveness of hand hygiene.

**Question Four: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details.**

**Response provided to the question: Is there anything missing that needs to be added to the draft revised guidelines, if so please provide details?**

Jewellery, watches, fingernails and clothing

The Board expects all registered practitioners to wear short-sleeved clothing when practising acupuncture, to ensure their hands can be effectively decontaminated, and to avoid wearing lanyards or neckties. Although we agree with the Board the importance of infection control, it is not practical to forcefully

order all registered practitioners to only wear short-sleeved clothing especially in regions such as Victoria and Tasmania with colder climate.

The most important comment I can make to the board:

As practitioners registered under CMBA, we expect the Board to give us strong leadership in the areas such as to submit application to the relevant authority for the eligibility for registered acupuncturist, e.g. Acupuncture item numbers(173, 193, 195, 197 or 199) in the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

By helping CM profession gaining equal rights as to most other Allied Health professions, the board is supporting CM profession delivers its best possible professional outcomes for the Australia public, therefore better protects the Australia public.

All healthcare practitioners who wish to practice acupuncture should be registered under CMBA in the form of full registration or undertakings, and be regulated under the same set of rules as other acupuncturists registered with CMBA.

We also expect the Board to seek consultation in dry needling regulation to protect public safety as realistically, dry needling is a form of acupuncture.

**Question Five: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Response provided to the question: Taken as a whole, are the draft revised CMBA guidelines practical to implement and sufficient for safe practice of acupuncture?**

**Question Six: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Response provided to the question: Do you support a review period for the CMBA Guidelines of at least every five years, noting that the period is influenced by when the Australian guidelines are updated?**

**Question Seven: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Response provided to the question: Do you have any comments about how the Board might launch the CMBA guidelines to make sure that registered practitioners understand their obligations?**

**Question Eight: Do you have any other comments?**

Response provided to the question: Do you have any other comments?