

Individual responses (R-Z) 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 Rachael Oi king Lau

(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 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?

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?

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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?

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

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Response from Serg Mezho

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not much issues, but MD and other therapist communication and dependence is not good. Would be better to get more proper interaction between different professions in medical field. Also advice on telemedicine for TCM is NOT suitable at all!

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?

so far all good

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

ok

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International recognition of the TCM practitioners

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it is good, but let the practitioner to charge the danger of the situation, not some one else, please.

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well....it is very hard to answer, depends on situation around and in the world .

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as far as will be clear and delivered by communications or societies

Question Eight: Do you have any other comments?

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

No, thanks

Response from Shao Ping Xian

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Response from Shulan Yang

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Response from Shuyi Zhang

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A five-year review period is acceptable, but if interim review and revision is required, it must be done before the end of the five-year review period.

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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 Susan Shanshan Qian

(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

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?

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).

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.

Response from Terence Sun

(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?

Wearing short-sleeved should not be considered as cold temperatures in the office

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?

Agree

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?

Let acupuncture professionals can join the medical system to benefit the public other than some GP currently can use it only.

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?

Agree

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?

Agree

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?

Nil

Question Eight: Do you have any other comments?

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

Strongly expected that the CMBA can help to submit application to the relevant authority for the eligibility in Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

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.

Response from Victor Wu

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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?

"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 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?

Response from Wei Xiang Pan

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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.

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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?

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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 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 Xiang Xin Huang

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

Response from Xiao Ping Yu

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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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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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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.

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?

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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 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 XiaoDan Huang

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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?

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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.

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

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3 Cuts, abrasions and other skin conditions

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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.

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

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Response from Xiaowen Li

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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.

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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?

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 Xiaoying Zhu

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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?

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?

Yes

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?

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

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

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

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?

No

Question Eight: Do you have any other comments?

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

No

Response from Yan Yi Ning

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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?

TCM treatment is inseparable from TCM treatment. Banning the use of some Chinese medicines will greatly reduce the effectiveness of the treatment.

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?

Nil

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?

Nil

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?

Nil

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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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 I do.

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?

Nil

Question Eight: Do you have any other comments?

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

Nil

Response from Yaqin Jin

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

Response from Yuan 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?

1. on page 11 of the draft plan, the Australian Guidelines encourage wearing short sleeved uniform and indicates long sleeved uniforms would be accepted too as long as it can be rolled up when performing direct client care. The proposed guidelines should keep consistent with the Australian Guidelines rather than making wearing short sleeved uniform mandatory or expecting every practitioner to wear short sleeved uniform, as long as when wearing uniform with sleeves it can be rolled up securely should be considered equally effective as the short sleeved uniform.

2. the use of a plastic mat on flooring where water drops or contamination with fluids may occur. e.g. near a sink or treatment table would not be necessary and is a redundant piece of precaution as it may well become a hazard to the practitioner or clients. The mat when placed will be slightly raised from the floor on which the practitioner or clients may be tripped over resulting in fall/other types of injury at the workplace. When wet it may become slippery so become another risk factor for the practitioner and clients when working in the clinic. If a used acupuncture needle accidentally dropped on the floor around the mat it easily gets stuck or lost under the mat which poses a greater risk for the practitioner and clients, especially when trying to locate it then dispose of it safely from under the mat.

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?

the proposed new requirements are very stringent and some are not necessary/practicable as listed above, rather they may become a potential hazard if applied in practice. The specific requirement for wearing short sleeve uniform is over stringent and not necessarily be beneficial to every practitioner. It should carefully consider the practitioners' differences and preferences as to what type of uniforms they should wear as long as it meets the Australian Guidelines for when/if wearing long sleeved uniform it can be rolled up securely. I think it would be a more sensible requirement if it can be left to the practitioner to choose either long or short sleeved uniform according to their preference and working environment where it may be heavily airconditioned all the time. This will receive better compliant rate amongst practitioners.

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?

partially practicable and I recommend to make changes as described above to the proposed guidelines before finalising it.

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?

I think it would be sufficient to receive a review every 10 years rather than every 5 years, given there are no major updates from Government regarding the Infection control guidelines.

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?

the plan for each Acupuncture clinic to have an infection control plan, I am not sure if other practitioners would also consider it being necessary to develop another one for their practice when the national guidelines from the Chinese Med Board already contain such comprehensive document which is very specific and readily accessible. Practitioners can refer to it at any time if required.

Response from Yue Hua Sun

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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?

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 Yueh-shu Tsai

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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 would suggest that the guideline treats BBE (bare below elbow) as recommendation rather than a mandate. The reason is that the evidence for BBE is inconclusive and controversial. For example, a study shows no statistically significant reduction in colony count:

<https://www.uptodate.com/contents/infection-prevention-precautions-for-preventing-transmission-of-infection/abstract/74>

Also, some non-medical issues should also be considered, such as the patient perception and cultural appropriateness:

<https://www.infectiousdiseaseadvisor.com/home/decision-support-in-medicine/hospital-infection-control/bare-below-the-elbow-and-implications-for-infection-control/>

Therefore, I would suggest taking a recommendation approach, not a mandate approach.

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?

A little 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?

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 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?

Host on-line meetings to inform the registered practitioners, and count the hours into the CPD points to encourage participation

Question Eight: Do you have any other comments?

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

Does CMBA have any initiative to address the issue of "dry needling" by under-qualified healthcare workers? The establishment of CMBA is to protect the public safety, but this purpose is strangely abused by those who do "dry-needling/acupuncture" without sufficient training.

Response from Yueping Li

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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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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 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?

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Response from Yuet Lung Kwok

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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 Yun Chen

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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.

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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?

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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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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?

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Response from Yuru Hou

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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?

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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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Response from Yvonne Yao

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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?

According to the new guidelines, the term of ""herbs"" is now becoming to ""medicinal ingredients"". The change doesnot explain a clear scope definition of both terminologies and impacts associated. Therefore I am opposite to this change.

Please keep the original term herbs and add the extra scope such as medicinal ingredients in addition.

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?

No, the guideline should be reviewed and drafted by a group of Chinese medicine practitioners in advance. The representatives should be pointed by the peers of CM practitioners so that the rules can be practical and effective. Creating a rule which has less involvement of the target groups is a poor process.

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?

The scope of herbs and the scope of medicinal ingredients

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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The changes are so immature, it should be reviewed annually so the mistakes can be corrected asap.

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Response from Zhankui Wang

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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."

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

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.

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Response from Zhao Chen

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As I have learned, there is no need to sterilize the skin before acupuncture.

I have never encountered any infection without sterilizing the skin.

I cannot see any reason to ask acupuncturist to wear short sleeve to do acupuncture.

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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Response from Zhenying Guan

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