

Individual responses (A-H) 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 Albert Yu-Sheng Wang

(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?

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?

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?

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 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?

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Response from Chuan Zhi Ni

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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?

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Response from Desheng Zhou

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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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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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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.

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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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 Dr. Wen Cheng Wang

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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.

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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?

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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 Gui Qing Xu

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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?

The draft revised CMBA guidelines have some issues.

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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.

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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?

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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 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 Hai Wei Chen

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3 Cuts, abrasions and other skin conditions

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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 Haifeng Qin

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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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Response from Hong Wang

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

“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 I 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 winter

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 Hua Li

(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?

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?

Alcohol-based hand rubs are equally effective to traditional soap and water. This is standard for hospital hand hygiene protocol. Alcohol-based hand rubs are convenient and quick, but if the practitioners feel their hands are sticky after multiple uses of alcohol-based hand rubs, washing hands with soap and water is a good practice.

Wear short sleeves should be optional, not compulsory. First, it is not practical in some areas, especially in the winter season, secondly, an acupuncture needle is a very fine needle, it should not be considered as an invasive procedure like other injection needles. It is different.

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?

It is nothing too much or too little if it is right and practical for the acupuncture procedure.

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?

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. But it should allow for review in-between if needed.

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?

It is better to provide guidelines both in English and Chinese, as a lot of practitioners' first language is Chinese.

The Chinese version can make it more clear for them and help the practice in a safe way efficiently.

Question Eight: Do you have any other comments?

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

Acupuncture can greatly help mental health patients and improve the wellbeings of disabilities. It would be beneficial for Australians if Acupuncture item numbers can be added to the Medicare Benefits Schedule and other PBS schemes (CDM, NIDS, DVA).

Response from Hui He

(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).

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 Hwe Tang

(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?

"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?

no, guidelines should be taken into consideration from a broader aspect of TCM practicing method.

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 revised draft guidelines cover all necessary aspects for safety Chinese Medicine practice.

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?

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.

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?

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).