

25 May 2012

Executive Officer
Chinese Medicine Board of Australia
AHPRA
GPO Box 9958
Melbourne
VICTORIA 3001

Dear Sir / Madam

Consultation Paper on Proposed Guidelines for Continuing Professional Development

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to respond to the Chinese Medicine Board's Consultation Paper on proposed Guidelines for Continuing Professional Development (CPD).

CHF is the national peak body representing the interests of approximately two million Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

Health practitioner regulation is an area of considerable interest to CHF in terms of its key role in contributing to the safety and wellbeing of health consumers. CHF has welcomed the adoption of a Registration Standard for CPD by the Australian Health Workforce Ministerial Council.

CHF also supports the need to provide health professionals with clear guidelines on how to develop and maintain their clinical and non-clinical skills and knowledge in order to maintain a high standard of health care. Therefore, although this Consultation Paper is not specifically targeted at consumers, CHF has reviewed the draft Guidelines in terms of how they might impact upon the safety and wellbeing of health consumers.

CHF broadly supports the draft Guidelines on the basis that the underlying principles appear sound. However, we believe that there could be greater consistency with the CPD requirements for other professions and have provided some comments below.

Requirement for at least 14 hours of CPD to be completed via formal activities

CHF supports the requirement for 20 hours of CPD for registered Chinese Medicine Practitioners, of which at least 14 hours must be completed via formal activities. This is a good basic requirement. However, with the exception of physiotherapy, there are more stringent requirements around CPD for other professions:

- Chiropractors are required to complete 25 hours of CPD in each registration cycle of 12 months, of which 12.5 hours must be formal activities.
- Dentists are required to complete 20 hours of CPD in each registration cycle of 12 months, of which 16 hours must be clinically or scientifically based.
- Nurses and midwives are required to complete 20 hours of CPD in each registration cycle of 12 months, the context of which must be relevant to their practice.
- The Optometry board operates a points system with quite stringent requirements and is currently considering a two-year rollover for CPD requirements to introduce a level of flexibility and responsiveness to the profession, and better cater to the needs of rural and remote practitioners.
- Osteopaths are required to complete 25 hours of CPD in each registration cycle of 12 months, of which four hours must be related to a mandatory topic, and eight hours should fall within the category 'Learning with others'.
- The Pharmacy Board operates a credit system and recommends that pharmacists undertake a variety of activity types and, where possible, choose across a range of CPD activities, and include interaction with peers.
- Podiatrists must undertake activities from a mixture of categories to make up the required 20 hours of CPD each year.
- Psychologists are required to complete 30 hours of CPD in each registration cycle of 12 months, of which 10 hours must involve peer consultation. It is also recommended that 10 hours are 'active CPD', which refers to continuous professional development activities that engage the participant in active training through written or oral activities designed to enhance and test learning.
- Occupational therapists must complete 30 hours of CPD from up to three categories in each registration cycle of 12 months. The Occupational Therapy Board has limited the hours from each category to ensure a mix of learning experiences.
- Aboriginal and Torres Strait Islander health practitioners must complete 10 hours of CPD per year and 60 hours over three years, of which 45 hours are required to be formal CPD activities.

Examples of CPD activities

CHF broadly supports the examples of formal CPD activities provided, however, CHF recommends that the requirements be brought into line with other professions, and restrictions be placed on the proportion of CPD that can be spent on different types of activities. For example, practitioners should be committed to maintaining and improving safety and quality in healthcare through their day-to-day activities as part of their Code of Conduct. Therefore, CHF recommends that the quantity of the following quality improvement activities that can be allocated to CPD should be limited to six hours:

- clinical audit, and
- activities to improve quality or reduce risk in practice, involving evaluation and reporting.

Similarly, CHF also recommends that the number hours allocated to CPD for ‘participation in interest groups, committees, groups, boards, etc with a focus on broad health or professional issues’, be limited to six hours.

Finally, CHF recommends that formal activities include case discussion with health sector peers to encourage communication ahead of the implementation of the Personally Controlled Electronic Health Record and non-medical prescribing.

Time to retain records of CPD activities

CHF agrees that a period of five years is a reasonable time to retain CPD records. This timeframe should also be specified in the section on ‘Recording your CPD activities’.

CHF welcomes this opportunity to provide feedback on the proposed Guidelines for Continuing Professional Development and looks forward to the outcomes of this consultation.

Yours sincerely



Carol Bennett
CHIEF EXECUTIVE OFFICER