



澳華中醫學會

New South Wales Association of Chinese Medicine Inc.

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Attention: Executive Officer,
Chinese Medicine Board of Australia
AHPRA
GPO Box 9958
Melbourne VIC 3001

Email: Subject: Codes and Guidelines
chinesemedicineconsultation@ahpra.gov.au

Dear Ms Gillick

Re: Submission on the Codes and Guidelines

New South Wales Association of Chinese Medicine (NSWACM) is pleased to provide this submission to the above enquiry. NSWACM thanks the Chinese Medicine Board of Australia (the Board) for the opportunity to comment on the proposed Codes and Guidelines.

NSWACM is a branch association of the Federation of Chinese Medicine and Acupuncture Societies of Australia Ltd (FCMA), is one of the biggest professional associations of Chinese medicine in New South Wales. It is playing an important role in promoting the academic collaboration and educational exchange of Chinese medicine in Australia and oversea. For over twenty years NSWACM has fostered the Chinese medicine profession in New South Wales and in Australia, including through its statutory regulation.

NSWACM has reviewed the public consultation paper published by the Board on 21 November 2011. Our comments are provided below.

1. Advertising of Qualifications and Titles

Honorary title

NSWACM recommends that the title 'Doctor' be used by those Chinese medicine practitioners who will be registered under the National Registration and Accreditation Scheme (NRAS). As the title 'Doctor' is an honorary title, NSWACM notes that Chinese medicine practitioners are no different from other medical practitioners, chiropractors and dentists entitled to use the title. Chinese medicine is recognised by the WHO as a legitimate medicine system in its own right. Since registered medical practitioners in Australia are entitled to use the title 'Doctor', NSWACM is of the view that it is only logical for Chinese medicine practitioners to use the honorary title also.

However, NSWACM recommends that the use of the honorary title 'Doctor' should be limited to Chinese medicine practitioners registered in both divisions of Chinese Medicine, that is herbal medicine as well as acupuncture. NSWACM suggests that distinctions be made in the titles and qualifications of Chinese medicine practitioners as follows:

Dr. Steve Smith (Chinese Medicine) (Zhong Yi Shi)

(To be used only by a practitioner qualified and registered in both divisions of Chinese medicine, that is Chinese herbal medicine AND Acupuncture)

Steve Smith (Chinese Herbal Medicine Practitioner)

(To be used by a practitioner qualified and registered in Chinese herbal medicine only)

Steve Smith (Practitioner of Acupuncture) or simply (Acupuncturist)

(To be used by a practitioner qualified and registered acupuncture only)

Academic titles: Professional doctorate and Doctor of Philosophy

NSWACM recognises that there are practitioners with higher academic qualifications and recommends that this be explicitly acknowledged. Given that there are two types of doctoral degrees – Professional doctorate and a Doctor of Philosophy – NSWACM recommends that the distinction between them should be identified as follows:

Dr. Steve Smith (Doctor of Chinese Medicine) (Zhong Yi Xue Bo Shi)

This signals that the practitioner completed a professional doctorate in Chinese herbal medicine and/or acupuncture.

Dr. Steve Smith (Chinese Medicine Practitioner, Ph.D.) (Bo Shi)

This clarifies that the practitioner was awarded a 'Doctor of Philosophy' and not a 'Professional doctorate'.

Professorial titles

NSWACM fully supports the changes proposed by Board concerning the use of the titles 'Visiting Professor', 'Adjunct Professor', 'Distinguished Professor' and 'Honorary Professor'.

It is a general academic convention, whether in Australia or in China, that the title 'Professor' is used only at the time when its holder is affiliated with an academic institution. When the person leaves the institution, the title no longer applies to him/her. Therefore those who leave academic institutions are no longer entitled to use the title 'Professor'. If the person has a doctoral degree, then (s)he can revert to the title 'Doctor' instead.

NSWACM further notes that an 'Emeritus Professor' is entitled to use the title even when no longer employed by an academic institution. Therefore, NSWACM recommends that the title 'Emeritus Professor' be added to the advertising guidelines and be used by those awarded this title during or after their academic tenure as follows:

Emeritus Professor Steve Smith (Chinese Medicine Practitioner, PhD).

Other qualifications

NSWACM generally accepts that other qualifications such as Graduate Certificates, Diplomas, in medicine, physiotherapy, nursing and other areas of health science and practice be allowed to be advertised as these qualifications signal complementary skills, typically enhancing the practitioner's major skills. Generally, qualifications and degrees conferred by recognised higher educational institutions should be accepted.

2. Code of Conduct for registered practitioners

NSWACM supports the Code of conduct for registered Chinese medicine practitioners and the changes proposed by the Board.

3. Guidelines for mandatory notifications

NSWACM supports the proposed guidelines of mandatory notifications.

4. Guidelines for patient records

NSWACM opposes the proposed guidelines for patient records for Chinese medicine practitioners. NSWACM is of the view that such guidelines are unnecessary for the Chinese medicine profession at this time.

This recommendation is consistent with the practice of other established Boards regulating health professionals of the primary health care providers such as chiropractors, dentists, medical practitioners, nurses and midwives, optometrists, osteopaths, physiotherapists and psychologists. Neither of the Boards regulating these professions has had in place guidelines for patient records since the operation of the NRAS in 2000. NSWACM therefore questions whether the guidelines for patient records kept by Chinese medicine practitioners would substantially contribute to the safety and continuity of health care in Australia, as stated in the consultation paper.

NSWACM is of the view that the proposed guidelines would place an unnecessary burden on the Chinese medicine profession at a critical time when it is preparing for the introduction of its first national regulation scheme. NSWACM commends the work of the Board in developing the registration requirements and all mandatory codes and guidelines which are prerequisites for the registration process. NSWACM notes, however, that these mandatory codes and guidelines represent a vast body of literature and introduce new rules for the profession. NSWACM is of the view that the regulation process can only be successful if the profession embraces the new rules and guidelines and then implements them in practice.

NSWACM trusts the comments above will be considered by the Board

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kevin Chang', with a stylized, flowing script.

Kevin Chang

President of New South Wales Association of Chinese Medicine