



Australian Chinese  
Traditional Orthopaedics Association Inc.

澳大利亞中醫骨傷科專業學會

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1 October 2011

Ms Debra Gillick  
Executive Officer  
Chinese Medicine Board of Australia  
AHPRA  
GPO Box 9958, Melbourne 3001  
Email: [chinesemedicineconsultation@ahpra.gov.au](mailto:chinesemedicineconsultation@ahpra.gov.au)

Subject: Mandatory Registration Standards

Dear Ms Gillick

Re: **Submission on the Mandatory Registration Standards and the Grandparenting Arrangements**

I am writing in regard to the above matter on behalf of the Australian Chinese Traditional Orthopaedics Association (ACTOA) Inc. The ACTOA thanks the Chinese Medicine Board of Australia (The Board) for the opportunity to express its opinion on the mandatory registration standards and other proposals

ACTOA was established in 2000 to provide a platform for Chinese Traditional Orthopaedics practitioners to share clinical experience and to regulate its members to set and maintain a standard of professional ethics and best practices to ensure optimal level of service and health care from Chinese Traditional Orthopaedics practitioners.

The following are comments and suggestions with regards to the mandatory registration standards and other proposals.

1. **Continuing Professional Development (CPD) Guidelines:**

The ACTOA agrees with the proposed requirement of 20 hours CPD annually, with a minimum 20% in professional issues as one of the mandatory standards for registration. All practitioner members of the ACTOA are already required to demonstrate similar evidence annually as part of their membership renewal process.

ACTOA would like the Board to endorse the CPD requirement set by ACTOA for the renewal of registration each year.

## 2. **English Language Skills Registration Standard**

The ACTOA applauds and appreciates the Board consideration with the proposed English language skills registration standard included as “the exemption arrangement for grand-parented applicants”. However the ACTOA wishes to express its concern if those practitioners, after granted an exemption, who met the English language skills requirement for registration should not have their registration encumbered and stigmatised as “conditional registration”.

The ACTOA believes IELTS General Training 6.5 or its equivalent level to be an adequate and acceptable level of English language skill to reflect the historical uniqueness of the development of Chinese Medicine in Australia.

## 3. **Professional Indemnity Insurance (PII) Arrangements Registration Standard**

The ACTOA agrees with the proposed PII Arrangements Registration Standard. Guidelines for adequate PII should be developed by the Board and circulated to practitioners and PII provider insurance companies and brokers.

## 4. **Recency of Practice Registration Standard**

The ACTOA suggests that currently registered practitioners who enroll in postgraduate coursework study or research in Chinese medicine should be granted an exemption or they could be categorised as “*recent graduates*” under the proposed *Exemption 1 a*).

Guidelines should be developed by the Board to assist practitioners in this situation to meet the Board's requirements to demonstrate their recency of practice.

## 5. **Grand parenting Registration Standard: Transitional Arrangements For Qualifications**

The ACTOA agrees with the proposed Grandparenting Registration Standard in principle and would like to raise the following issues for consideration:

- a) **Wording of “*Phytochemistry and pharmaceuticals (Chinese herbal medicine only)*” under the heading of For Practitioners and For Dispensers** - Bachelor degree level qualification (or higher) on page 41 could be replaced with ‘Materia medica (Zhong Yao Xue) or Phytochemistry and pharmaceuticals (Chinese herbal medicine only)’ as the subject of phytochemistry and pharmaceuticals is quite a new study in Chinese herbal medicine and it may not be included in Bachelor degree courses of Chinese Medicine prior to the year 2000.

- b) **Overseas Qualifications** - The ACTOA would like the Board to consider endorsement of overseas qualification equivalent to accredited Australian degrees / courses based on the successful assessment of Overseas Qualification Units, Department of Innovation, Industry and Regional Development on the basis of assessment guidelines published by the National Office of Overseas Skill Recognition (AEI-NOOSR).

In conclusion, the ACTOA is of the view that overall, the proposed registration standards are comprehensive and appropriate and offer a balanced approach to the need for patient protection and accessibility to accreditation for legitimate Chinese Medicine practitioners applying for registration, as well as providing a very clear guideline for registration for potential Chinese Medicine practitioner applicants who wish to start their practice in Australia.

The ACTOA respectfully requests the Board to consider its observations and recommendations.

Yours sincerely



Dr. Pao Lung Chen

Secretary General of ACTOA