

AHPRA-MELBOURNE
RECEIVED

11 OCT 2011

澳大利亞註冊中醫聯合會

Australian Union of Registered Chinese Medicine Practitioner (AURCMP)

c/ Suite 604, 309 Pitt Street, Sydney NSW 2000

機構會員 Organisational Members :

澳洲全國中醫藥協會(ATCMA) 澳大利亞中醫學會(CMASA)
澳大利亞維省中醫針灸學會(VTAS/CMA) 澳洲全國中醫藥協會維州分會 (ATCMA-VIC)
西澳中醫針灸聯合會(SCMAWA) 澳洲全國中醫藥協會西澳分會(ATCMA-WA)
澳大利亞中醫學會昆州分會(CMASA-QLD) 澳洲全國中醫藥協會昆士蘭分會(ATCMA-QLD)
澳大利亞中醫學會南澳分會(CMASA-SA) 澳洲全國中醫藥協會南澳分會 (ATCMA-SA)
澳洲全國中醫藥協會北領地分會(ATCMA-NT)
澳洲全國中醫藥協會堪培拉分會(ATCMA-Canberra) 澳洲全國中醫藥協會紐卡索分會(ATCMA-Newcastle)

9th October, 2011

Debra Gillick,
Executive Officer,
Chinese Medicine Board of Australia
G.P.O. Box 9958
Melbourne VIC 3001
Email: chinesemedicineconsultation@ahpra.gov.au

Dear Ms Gillick,

AURCMP's submissions on the proposed standards focusing on the specific questions included in the consultation paper

On behalf of AURCMP and our members (about 1400 nationally), first of all we would like to express our gratitude towards to the Board (CMBA)'s assistance and approval for you to attend our Sydney consultation meeting on 9th October, 2011. Prior to this meeting, in order to achieve the best possible outcome and being productive, we have asked a NAATI accredited Professional Level Bidirectional Translator to completely translate the draft guideline & consultation paper as published by the Board and distributed to all our practitioners members via email. It has been a successful meeting with about 180 individuals attended the event. We believe the meeting has been well received by our practitioner members and many questions that were raised during the meeting and have been answered.

Regarding to the consultation paper that the Board has published in September 2011, we would like to submit our overall opinion regarding to draft guidelines of registration :

1. We agree with the Board and the draft guideline that most of the registration issues have been addressed in this document
2. The requirement of the CPD has been reasonable as described in the draft guideline and we agree with the current published guidelines
3. The professional indemnity insurance requirements has been a standard practice in many of our practitioners members and the draft requirements has been reasonably set despite some of our members believes 2 millions coverage has been higher than they expected
4. We agree with the section that has been written regarding to the criminal history check for the applicants and we believe it is necessary to up lift our overall practitioners' standards

5. We suggest the Board to consider setting up a registration category for retiree practitioner e.g., limited prescribing registration as in Medical Board of Australia
6. Regarding to the English language skills requirements, we suggest the Board to further explain to the practitioners about what is the actual meaning of "grand-parented" practitioners since a lot of the practitioner who holds degree in Chinese medicine thought that they are not qualified for applying English testing exemption under the grand-parented category since they hold a "degree" in Chinese medicine
7. It seems like a lot of our members do not understand that most of us will be registered with the Board as grand-parented practitioner regardless whether one holds a degree in Chinese medicine from China or not. We suggest the Board to explain this in details when the registration process commences
8. Some of our members hold qualification in Advanced Diploma in Chinese Medicine from private College e.g., Sydney Institute of Chinese Medicine and they worry that they will not be able to get registered with the National Board if they graduate after 2008. We suggest the Board to consider whether those graduate before 30/6/2012 can still be applying for registration

As we have given you all the Q&A slips for the Board's reference, we are hereby providing below some of the selected questions raised in the meeting on 9th October, 2011 for the Board's consideration :

CPD :

1. Within the draft guideline, it stated that "it should be noted that undertaking your day to day work duties cannot be counted as CPD hours". What about those practitioners who engage in full time teaching or research activities ?
2. In CPD requirement on teaching, what level of teaching is required to be counted towards CPD ? Does it need to be at bachelor level or above ? Or can it be counted if the teaching is done to the general public ?
3. Can Level 2 or Senior Level First aid course be counted towards the CPD requirements ?
4. Can the CPD activities that I participate being conducted in Chinese ? Or it must be in English ?

Criminal History :

1. Can one still be registered with the CMBA if one has been found clinical ignorance by the local court before ?
2. Can one still be registered with the CMBA if one has received disciplinary action by the respective CM peer organization before ?
3. Do I need to declare any criminal history background if that happened at overseas ?

Registration requirements :

1. Can overseas clinical experience within 2002-2012 be counted towards the 5 years experience requirements ?
2. Will all grand-parented practitioners in the national board need to keep up with their registration every year as set by the current CMRBVic ?
3. If my registration application has not been approved by 1st July 2012, can I still practice Chinese medicine until being informed the outcome of our application ?
4. Can I still practice Chinese Medicine/Acupuncture during the grace period to 2015 if I choose not to register till then ?
5. I have my Bachelor of Chinese medicine degree testamur notarized in China for both its Chinese and English version, can I be exempted from being assessed by NOOSR ?

6. I have been receiving "statement" (instead of "invoice) from my Chinese herbal supplier throughout these years of practise, can it still be counted as a piece of evidence for registration application purpose ?
7. Do I still need to apply for Chinese herbal dispenser registration if I am a CM practitioner ?
8. Will Advanced Diploma in Chinese medicine still be qualified to apply for registration in the future ?
9. I am about to retire and not intending to practice actively, am I allowed to see my friend or family as a CM practitioner if I am not registered ? Does the Board consider to have a retiree registration category ?

Ongoing monitoring :

1. Will the national board adopts all policies from those already published in the CMRBVic e.g., on advertisements, use of testimonials ?
2. After successfully obtain my CM practitioner registration, do I still need to get register with my local council for my practice ?
3. Can the CM practitioners use the title "Dr" ?
4. Will the Board monitor certain overseas titles e.g., "Visiting Professor" or "Honorary Professor" ?

English requirement :

1. If I have done my IELTS more than 2 years ago but have been working in the English environment with employers' evidence to proof this claim, can I still be considered exempted from re-taking IELTS again ?
2. Any coursework program that one can take as an alternative proof of one's English standard instead of sitting the English test ?

Once again thank you for your presentation at our meeting on 9th Oct, 2011 and also answered all the participant's questions. It is beyond doubt that many of the practitioners' confusion have been cleared during the meeting.

As being a newly formed Union of our future registered CM practitioners, we are happy to help out in any way we could to assist the Board's policy implementation and registration process for the development of Chinese medicine in Australia.

Please feel free to contact us if any clarification is needed regarding to our submission.

Thank you for your attention.

Regards,

Secretariat of AURCMP