

**DRAFT REGISTRATION STANDARDS CONCERNS**

- \* Australian-trained practitioners applying for registration under the national scheme should not be put to a higher grandparenting standard than applied under the Victorian scheme;
- \* All government/university-accredited qualifications at least three years full-time equivalent duration should be included on the list of courses deemed adequate for grandparenting, and that this include the past advanced diploma and diploma level programs;
- \* Unaccredited programs that were recognised by AACMA as meeting the requirements for practice at that time should also be included on the list of courses deemed adequate for grandparenting, and that this include the past practitioner diploma and unaccredited bachelor programs;
- \* The list submitted by the AACMA of Australian Chinese medicine programs deemed adequate for grandparenting purposes should be included on the CMBA list of courses deemed adequate for grandparenting purposes.
- \* The CMBA grandparenting standards must take into account non-practising members of the profession to enable them to obtain non-practising registration during the grandparenting period.
- \* **Existing practitioners from a non-English speaking background should have their English language competence assessed as follows:**
- \* Self-assessment of competence based on a signed statutory declaration conduct of the practitioner's Chinese medicine practice primarily in English should be sufficient evidence of English language competence for grandparenting purposes;
- \* community/academic/professional engagement where the language of communication is English should be sufficient evidence of English language competence for grandparenting purposes;
- \* where a practitioner has passed a Chinese medicine examination conducted in English should be sufficient evidence of English language competence for grandparenting purposes.
- \* Where a practitioner conducts his or her practice in a language other than English and is otherwise unable to provide sufficient evidence of English language competence, then conditions may apply.

**Regarding recency of practice**, many issues arise including:-

- \* having regard to the grandparenting evidence of practice requirements, should the cycle be extended to 5 years;
- \* new graduates should not be required to have a shorter non-practising period after graduation than other applicants for registration – the period should coincide with the period practitioners can be out of practice before having to submit a re-entry plan [this would support an argument for the period to be three years and not five years as new graduates need to commence practice in order to consolidate their knowledge and skills];
- \* What is deemed to be practice? Each board has taken a different approach to this issue and some refer to a minimum number of practice hours (e.g. 400 hours over three years).

I believe that special consideration needs to be given regarding pathways to registration for non-practising members who cannot demonstrate recency of practice.

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