

28 September 2011

Board of Chinese Medicine, Australia
AHPRA

Grandparenting registration standard: Transitional Arrangements for Qualifications

7.1 I disagree with the qualifications standards where a course of study which is consistent with a minimum of Advanced Diploma level in the AQF is considered adequate only if it had been obtained before 2008. While it is appreciated that the Board demands a high standard in safety and quality of practitioners for the protection of the public, it is inconceivable and inequitable to conclude that Advanced Diploma courses which have been run for over 20 years, would be of an inferior standard after 2008.

In the case of Sydney Institute of Traditional Chinese Medicine (SITCM) from where I graduated, the opposite is true as the course has been restructured on an ongoing basis to take into account contemporary issues in traditional Chinese medicine and one can only conclude that graduates from Advanced Diploma courses from 2008 to 2011 are better trained academically.

I understand and commend the Board wishing to raise the standards of training and qualifications of Chinese Medicine practitioners in the future. However, for the grandparenting arrangement during the transitional period graduates of Advanced Diploma obtained prior to June 2012 should be accepted for general registration. Future registrants after June 2012 should be informed of this standard and be held to this.

In addition, a lot of graduates from SITCM's Advanced Diploma courses who graduated from 2008 to 2011 have been practising, some very successfully, in the community. Most of them would not have completed 5 years of practice within the profession but have had PI insurance, acceptance by major health funds for rebates, acceptance as members by major Chinese medicine

professional association. Practising traditional Chinese medicine has been their main and only livelihood. Some of them spent a lot of capital in building up the goodwill of their business. If these practitioners are not allowed to register without incurring further financial burdens of obtaining a bachelor's degree or sitting for examinations, their livelihood will be ruined and the welfare of their patients disadvantaged. This will give the whole industry of traditional Chinese medicine a bad name.

Recommendations:

I recommend that the Chinese Medicine Board *in this transition period* to registered practitioner status, allows holders of Advanced Diploma in Chinese Medicine (Herbal and Acupuncture) up to June 2012 to transit automatically to full registration.

I recommend that practitioners with Advanced Diploma in Chinese Medicine up till 2012 be treated equally with those holding degrees.

I recommend that no additional burdens, eg, entrance exams, practical tests, etc, be inflicted on practitioners with Advanced Diplomas in Chinese Medicine up to June 2012 that would not be equally sought from practitioners holding Bachelor degrees.

Yin Na Kan
Advanced Dip TCM