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Board of Chinese Medicine, Australia
AHPRA

Dear members of the Board,

**Re: SUBMISSION – GRANDPARENTING REGULATION STANDARD:
TRANSITIONAL ARRANGEMENTS FOR QUALIFICATIONS (SEP 2011)**

I would like to draw your attention to the unfair treatment of holders of Advanced Diploma qualifications obtained after 2007.

According to the draft grandparenting standards, only a bachelor degree or higher qualifications, will be considered adequate for registration after 2007.

This new proposal means that recent and current graduates of accredited Advanced Diploma programs will be ineligible for registration on the basis of their qualification. They will be also unable to apply under the recency of practice clause (five years practice out of the last 10 years) as they will not have five years practice.

Grandparenting under a national scheme needs to take into account the current position and history of Chinese medicine for of all States of Australia, not just what

was has been happening in Victoria. Grandparenting needs to enable existing practitioners, recent graduates and students in the pipeline to practice in the profession.

The discussion of upgrading training requirements to degree level is known to those in the industry for some time. Yet, 3 out of 4 of the major professional associations, the **Australian Natural Therapists Association**, the **Australian Traditional Medicine Society** and the **Federation of Chinese Medicine and Acupuncture Societies** have accepted and continues to accept graduates of Advanced Diploma in Chinese Medicine from approved colleges as full and equal members as those with Bachelor degrees. In other words, these 3 professional bodies view such graduates including those recently qualified, as having pursued a quality course, are safe and clinically competent to practice. These 3 professional bodies accept and have ensured that the public is protected from harm where Advanced Diploma members are concerned, no more and no less than their degree level members.

In addition, practically all the insurance companies are willing to extend professional indemnities to practitioner-members holding Advanced Diplomas in Chinese Herbal Medicine and Acupuncture. Insurance companies which are highly risk-averse would not have accepted such undertakings if these practitioner-members were in any way clinical incompetent or sub-competent, thereby becoming a threat to the public.

It would seem an oversight of the Board to impose an unnecessary exacting burden on graduates with Advanced Diplomas, especially those after 2008, in the name of public safety when such a perceived threat or lack of safety and quality have not been proved.

Recommendations:

I recommend

- 1) 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.

- 2) that practitioners with Advanced Diploma in Chinese Medicine up till 2012 be treated equally with those holding degrees.
- 3) 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.

While it may be easier to follow the Victorian model, I urge the Board not to simply take the easy road but to review the matter anew. Practitioners like myself do want to raise the profile and standards of the profession but not in a manner that is extraneous, and exacting further financial and other burdens which eventually disadvantage the public who uses our services. Standards required must be equitable, appropriate and relevant rather than elitist.

It is my hope that you, the Board members, will give my submission deep consideration. I look forward to your reply.

Regards,

Juhyun KIM