

Mon 10/10/2011

Dear Sir or Madam:

I'm writing to express my opinion on the proposed Chinese Medicine Practitioner Registration Standards published on September 2011. I read the draft and the Queensland National Law carefully, and I feel that the Board has made a great length to help a group of practitioners who are unable to speak competent English to register, while being strict with practitioners who do not have higher level of professional qualification. My opinion is described as the following:

### **English standards**

I have to pointed out some standards and evidence for adequate English are not well grounded and some concepts are only defined or imagined by the Board itself, for example, the definition of competent English ( page 19). An interpreter may cause other legal issues during the consultation or treatment. For example, a mistake in translation may cause a serious damage to a client. To which extend should the interpreter and the practitioner be responsible for it?

### **Qualification**

I have to point out insisting on a bachelor degree or higher level in TCM may be unfair to some practitioners. Advanced diploma in TCM is accredited course in Australia. The diploma is accredited by the government and association. The accreditation is approved by related standards and Australia laws, rather than a single person.

### **Adequate clinical training**

I have to pointed out insisting on postgraduate level of clinical training is not appreciate and unfair. According to this draft, a practitioner with a bachelor or master degree in medicine spent 3 years (including 1000 hrs clinical training ) to complete advanced diploma course may be unable to be registered while a practitioner with a bachelor degree in nursing is able to be registered if he has a 1 year postgraduate certificate(including 210 hrs clinical training)

### **Comments and suggestions:**

I can understand why the board make such a draft. Many existing practitioners who lack English competency have being practicing TCM in Australia for many years. They have good professional skills. It is cruel to deprive them of the right to practice TCM in Australia. However, it is also cruel to an advanced diploma student if he can not be registered. The law should be fair to everyone.

I suggest that a point test system be established. Just like Australia permanent residence visa point test system.,a pass mark can be set for general registration. For example, pass mark is 100 points. an accredited bachelor degree in TCM will be give 60 points, IELTS 4 band 6 is 40, one year practice in Australia is 10. A applicant who is able to get a total of more than 100 points is eligible to general registration. however, IELTS speaking 5 or 6 should be compulsory to every applicant. It is not a high mark, everyone is able to get more than 5 in IELTS speaking section, as long as he practice TCM in Australia.

Thank you for reading. Making such a standard is a hard task for anyone. Please feel free to contact me if you need more help or advice.

Regards

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