



A/Senior Director
People and Services
Cnr Vanderlin Drive and Trower Road
Casuarina NT 0801
Postal Address: PO Box 40596
CASUARINA NT 0811
Tel: 08 8992 7237
Fax: 08 8992 7277
eMail: jill.macandrew@nt.gov.au

Our Ref: DD2011/08447

Ms Debra Gillick
Executive Officer
Chinese Medicine Board of Australia
Australian Health Practitioner Regulation Agency
GPO Box 9958
MELBOURNE VIC 3001

Dear Ms Gillick

RE: CHINESE MEDICINE BOARD OF AUSTRALIA – PROPOSED REGISTRATION STANDARDS

I am writing in response to the Draft Registration Standards released by the Chinese Medicine Board of Australia for public consultation.

The Northern Territory does not currently regulate Chinese Medicine practitioners. The Department of Health has undertaken consultation on the draft standards with Northern Territory stakeholders who have identified themselves as practicing within this profession.

National registration is considered to be positive recognition of this profession and a means of ensuring services are provided to the public by competent practitioners. Comments received overall have been supportive of the proposed standards.


General comments include:

- Requirements should be set at a minimum to be achievable for jurisdictions that do not currently have regulation in place and still provide the ability to achieve more if opportunities exist.
- There should be flexibility for practitioners in rural and regional areas and sole practitioners, for example, who would find it difficult to access or attend CPD activities.
- The standards should provide practitioners sufficient information about what is required to meet requirements for registration, rather than relying on the Board's discretion to determine a further requirement post application.
- Standards should include a full range of definitions to inform potential applicants and clarify requirements for practitioners
- The preference would be for consistency of terminology and interpretation of standards across professions, wherever possible.
- The level of professional indemnity insurance cover should be in line with industry standards and based on industry advice.
- The 3 yearly review of the standards will allow for revision of requirements, as required.

I acknowledge that the Board will publish this submission on its interim website.

On behalf of the Department of Health, I would like to extend my appreciation for the opportunity to contribute to the development of national standards for Chinese Medicine.

Yours sincerely



Jill Macandrew

19 October 2011