

(1) Draft registration standard: Continuing professional development (CPD)

(a) Mandatory CPD Requirement

Mandatory further education, training, mentoring or supervision (which is remedial) may not be counted towards CPD.

Counter Proposal: even mandatory further education, training, mentoring or supervision should be counted toward CPD as they are still related to professional development.

(b) Suitable Activities

CPD activities should be:.

a) Be relevant to the registrant's area of practice

Counter proposal : as long as the activities can assist in one's practice or in the running of the TCM business.

b) Include research and teaching

Counter proposal: Include research, teaching and TCM programme developer regardless of whether it be full time or part time, remunerated or not in Australia or overseas.

(2) Draft registration standard recency of practice

Exemptions

Counter proposed:

Practitioner who has obtained **registration from any country's Traditional Chinese Medicine Practitioners Board**. Since the Country's TCM Board has accepted and registered the practitioner under its country ACT, this proves their competency, the practitioners should not be penalized and demoralize from continuing their practice.

(a) Adequate Qualifications

(i) Bachelor Degree level qualification (or higher)

A relevant course of study that is accredited at Bachelor degree or higher under the Australian Qualifications Framework (AQF) assessed by NOOSR or....

Counter Proposal:

(I) A relevant course of study which the practitioner who has obtained **registration from any country's Traditional Chinese Medicine Practitioners Board**. Since the Country's TCM Board has accepted and registered the practitioner under its country ACT, this proves their competency, the practitioners should not be penalized and demoralize from continuing their practice.

(ii) Provisional Grandparenting : A relevant course of study that is accredited at Diploma level by end of year 2012 with AT LEAST 1 year of clinical practice

with added condition that the practitioners will upgrade to Bachelor Degree in the next 5-year period. This allows the practitioners to upgrade their qualification while at the same time enabling them earn a living to pay for their continued up-grading. The practitioners will be able to gain more competency as the clinical practice runs parallel with the up-grading courses. As a result the patients will benefit from such system.

Qualification before 2008

A course of study which is broadly consistent with a minimum of Advanced-Diploma-level in the Australian Qualifications Framework (AQF) (assessed by NOOSR)

Counter Proposal:

The proposed national mandatory registration standards unfairly penalize those who have a recognized certificate or Diploma or Advanced-Diploma in TCM obtained from 2008 to the commencement of the statutory national registration scheme. This cohort of practitioners neither qualify for general registration nor qualify for the transitional arrangements for qualification under the grandparenting registration standard.

Since the actual date for the TCM Practitioner registration starts from 1/7/2012 it is more reasonable to have the **cut-off date set at 2012** instead of before 2008. Practitioners who have certificate or Diploma or Advanced Diploma level in TCM any time before 2012 also have obtained valuable clinic practice and competency. They should not be penalized and demoralized. For those who have obtained certificate or Diploma in TCM before 2012 can be put on Provisional grandparenting scheme with the added condition that the practitioner will upgrade his/her qualification over the next 5 years to a Bachelor degree. This is a more reasonable bridging step for the transitional stage.