

To: Chinese Medicine Board of Australia (CMBA)

Submission on the Draft National Registration Standards

After having undertaken an initial review of the Consultation Paper issued by the CMBA in September 2011, as well as commentary from the AACMA, I would like to submit for consideration by the CMBA the following points:

- The proposed grandparenting standards appear to apply a more rigorous standard to practitioners applying for registration under the national scheme than those who were registered under the Victorian scheme, and who automatically enjoy registration under the national scheme draft grandparenting standards.
- The CMBA appears to be taking on an onerous task in the evaluation of credentials and practice details of the many practitioners who have already worked hard, in conjunction with their professional associations, to assure high standards of education, practice, and public safety during the decades of self co-regulation. A more in-depth exploration of the merits of these existing standards might reveal pathways to the desired high national standard that are more time and cost effective.
- Evaluation of overseas credentials will be an extremely slow and costly process if the NOOSR is the pathway for recognition of academic standard equivalency. For nations that have registration or licensure in place it seems reasonable to accept the credentials of their certification agencies, particularly if they are of a known high standard.

Section 8 of the Consultation Paper mentions the important need to address both public safety and the “continuous development of a flexible, responsive, and sustainable Australian health workforce”. It is my belief that this flexibility and responsiveness may be best developed by further consultation with the diverse stakeholders in the profession; and that recognition and integration of the substantial amount of progress that has already been accomplished will greatly contribute to the sustainability of the type of workforce envisioned in the paper.

I applaud the members of the CMBA for their willingness to take on the daunting task of guiding the profession through the complex legal and social landscape towards registration. I wish both the CMBA and the profession as a whole the very best of success in the establishment of Chinese Medicine as a key component of health care in Australian society.

Yours sincerely,

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