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The Executive Officer
Chinese Medicine Board of Australia
AHPRA, GPO Box 9958, Melbourne, 3001

Email: chinesemedicineconsultation@ahpra.gov.au

Dear Sir,

Re: Mandatory Registration Standards

Thank you for the opportunity to comment on the proposed mandatory registration standards for Chinese Medicine. I request that this submission be treated as confidential.

Continuing professional development

1.1 Whether you agree with the number of hours specified

We broadly agree with the proposed standard of 20 hours of CPD per year which should contribute directly to maintaining and improving competence in the profession. This is comparable to the requirement in other allied health professions (eg physiotherapy).

1.2 Whether you agree with the requirement that a minimum number of hours must relate to professional issues

1.3 Whether you agree with the requirement that for endorsed practitioners and dispensers a minimum number of hours must relate to scheduled hours

We suggest that it is unnecessary to mandate separate requirements for sub-areas since this is covered by the requirements that CPD contributes directly to professional activities as required by the general provision. We consider that setting these additional requirements will add to the complexity and difficulty of recording and verifying compliance with the standard. It is also likely to devalue longer programs offering a more holistic approach to CPD and favour short information sessions.

1.4 Whether you agree that mandatory further education, training, mentoring or supervision (which is remedial) should not be counted

1.5 Whether you agree with the exemptions.

We agree with these provisions and with the list of suitable activities.

English language skills

3.1 Whether the evidence requirements in the proposed standard is acceptable

3.2 Whether you agree with the minimum test result levels

We agree with the proposed standard and minimum test levels which are comparable to those in other allied health professions (eg physiotherapy).

3.3. Whether you agree with the effective communication requirements applicable for all practitioners;

We believe that the requirement that all practitioners must ensure effective communication for the purpose of consultation/treatment of patients is critically important for safe practice. We intend to ensure that our students in qualifications leading to initial professional accreditation meet the standard as a condition of their participation in clinical placements. However, we believe it is appropriate, in the same as for other allied health professions (eg physiotherapy) that the standard should not be enforced for students.

3.4 Whether you agree with the general exemptions

We question the need for the first exemption in clause 1 applying to circumstances of limited patient contact. If it is maintained, we consider that the nature of the limited patient contact should be defined in order to demonstrate that there is no risk to patients and other health workers.

The standard expressly states that it does not apply to students. However, if a student seeks to be registered, it seems appropriate in our view to require compliance with the standard in the interests of patient safety. The second exemption in clause 1 relating to students does not seem necessary.

Australian universities generally require proof of English language proficiency no more than 2 years old in an application for admission. On that basis, the exemption for continuously enrolled students seems appropriate.

3.5 Whether you agree with exemptions which apply to 'grandparented' practitioners

3.6 Whether you agree with appropriate arrangements for the purpose of consultation/treatment

3.7 Whether you agree with appropriate arrangements for contacting emergency services.

While recognising the multi-cultural nature of Chinese medicine practice, we feel that the broad exemptions envisaged in this clause may put effective communication with patients and emergency services at risk. Further safeguards to verify the effectiveness and currency of the 'appropriate arrangements' may need to be considered so that the standards are not undermined.

In addition, we suggest that there should be a clear statement about what will happen after 31 December 2015 when, presumably, the exemptions are removed.

Grand-parenting

7.1 Whether you agree with the qualifications standards

We broadly agree with the coverage of the proposed standards, but question the adequacy of some of the requirements. In particular, the proposed minimum practice hours to meet the requirement of adequate clinical training (390 hours for undergraduate programs and lower hurdles for other qualifications) does not compare favourably with the standards set by the professional bodies (eg 500-800 hours for undergraduate programs required by the Chinese Medicine Registration Board of Victoria).

We believe the quantum of clinical practice should be reconsidered and suggest that there should also be some description of what types of supervised clinical practice are acceptable.

7.2 Whether you agree with the types of practice evidence requested


We question whether the provisions establish current competence through qualifications and professional practice. As stated, they appear to recognise a qualification obtained prior to 2002 with 5 years of practice between 2002 and 2007 and no subsequent involvement in the profession. This seems inappropriate and counter to the intentions of continuing professional education. We believe the requirement for continuing professional practice should be applied to the period between 2006 and 2012 and that evidence of continuing contact with the profession in the last 2 years should also be required in order to ensure competence of practice for public safety.

7.3 Whether you agree with the types of competence evidence requested

Schedule 1: We suggest a requirement for 3 instead of 2 separate pieces of evidence should be required for general practice in acupuncture and Chinese herbal medicine.

I would be very happy to provide additional comments on any of these matters.

Yours sincerely,



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Dean
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