

Tue 27/09/2011

To chinesemedicineconsultation@ahpra.gov.au

Background

I am writing this submission in support of my personal acupuncturist / herbalist, Kitty Tam, who is a member of ATMS Australian Traditional Medicine Society and FCMA Federation of Chinese Medicine & Acupuncture Societies of Australia.

Kitty graduated with an Advanced Diploma of Traditional Chinese Medicine (91133NSW) in 2010, from Sydney Institute of Traditional Chinese Medicine (SITCM). She recently informed me that as a result of the introduction of the National Registration of Chinese Medicine practitioners on 1/7/2012, she will not be able to practice from July 2012. She would not qualify under the "Grandparenting registration standard".

Analysis

The Consultation Paper "Section 7 Grandparenting registration standard: Transitional Arrangements for Qualifications" stated that :

Adequate Qualifications.....

Qualifications 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).

I fully support the Board's decision in ensuring that adequate training is required to practice Chinese medicine. I also support that Advanced-Diploma-level in the Australian Qualifications Framework (AQF) is deemed adequate to practice. However, I can not see any reason why only Advanced Diplomas before 2008 are deemed acceptable, while those awarded from 2008 were deemed inferior.

1. Advance Diploma awarded by Australian education institutions have been recognised as maintaining extremely high standards. In the case of SITCM, the course is accredited with the NSW Vocational Education Training and Accreditation Board (VETAB), and is AUSTUDY approved. Sydney Institute of Traditional Chinese Medicine was established over 20 years ago. Its graduates have been providing outstanding TCM services to the community for a very long time.
2. There is no reason to assume that Advance Diploma holders who graduated before 2008 are any more knowledgeable or better trained in Chinese medicine than more recent graduates. Actually the reverse may be the case as more recent graduates are exposed to recent researches and development in Chinese Medicine applications.
3. Advance Diplomas have been accepted by most professional associations in Chinese medicine for professional membership. This established the level of training required to practice Chinese medicine.

4. Advance Diploma holders are also accepted by the majority of private health funds for rebate to provide Chinese herbal medicine and acupuncture services.
5. **Age Discrimination Act 2004** – by imposing a 2008 cut off, the proposed Grandparenting registration standard may have violated provisions in the Age Discrimination Act, as the rule disadvantages younger Advanced Diploma holders.

Recommendation:

1. **Accept all Advanced Diploma holders** as adequate to register under the National Registration, regardless of the year of graduation, at the start of the national registration scheme (1/7/2012).
2. To provide transition of current students studying Advanced Diploma, **Advanced Diploma should be acceptable for registration during the Transition period (to Jun 2015)**.
3. **Recognition of professional membership:** Membership of particular professional association at a specific point in time (eg 1/7/2012) might be used as the requirement for initial registration. This should only apply where professional associations have a long history of adherence to minimum professional standards, codes of conduct, evidence of having policed their own membership, requirements for continuing education and professional development.

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