

Wednesday, 12 October 2011

Dear Executive Officer

Thank you for consulting the profession regarding the draft registration standards currently being considered.

I agree with the CPD standards proposed and support them. However, I would like to suggest that the requirement for 4 hours CPD in professional issues may need further definition. It is my expectation, and probably the Boards, that CPD opportunities in this area will become available in response to this requirement, and perhaps further details of the exact requirements will enable practitioners to self-direct their CPD choices more in line with the Boards expectations. As CPD for Chinese medicine practitioners is part of my research area, I am keen for the Board to support practitioners in their professional practice, however I also feel that the scope of the CPD requirements should support the diversity of practice areas and skills required by a Chinese medicine practitioner in Australia, and therefore could include areas as different as the development of small business skills to the study of other forms of healthcare delivery, such as counselling.

The criminal history standards are appropriate and I consider them important in order to not only safeguard the public as much as possible but also the reputation of the profession. Unlike other areas, such as the English language requirement, where I feel standards should be as specific as possible, this is one area where I feel it is appropriate for the Board to be able to make accountable decisions regarding individual.

It is my understanding that the English Language standards are important as we are practicing in Australia in which the common language is English. I support the Boards proposal and appreciate that the Board recognises that Chinese medicine in Australia is practiced in many different languages and cultural groups. While English is my first language, it is my hope that the definitions regarding this requirement, in particular 'competent English' and 'appropriate arrangements', are clearly enough defined that there will be no practitioner who is unclear as to what the exact requirements are and be able to implement them reasonably.

I support the proposed Professional Indemnity Insurance requirements. In particular, I agree with the minimum level of cover required be \$2million, as this is what has been required and I am unaware of any case where this has been inadequate. While Chinese medicine can be dangerous, thus requiring regulation, with the appropriate level of education and commitment to standards Chinese medicine practice is largely a very safe endeavour and therefore a contribution to the provision of healthcare for Australians. As largely sole-traders in small business, it is important also to consider the costs associated with practice, and this requirement therefore is reasonable as it has been adequate to date.

I appreciate the grandparenting standards proposed and consider the requirement for a degree-level education as important not only for the protection of the public but also for the continued protection of the safe and professional practice of Chinese medicine in Australia. It is important that the practice of Chinese medicine be carried out by those people who are sufficiently trained, especially in the theories and principles of Chinese medicine. While I understand that this requirement is more than the Victorian transitional arrangements, it also appears to me that the current standards and expectations for professional practice have increased since that time. And as a detailed system of medical practice, it is important that the title of this practice be protected from those who may seek to practice or acquire elements of Chinese medicine practice, without adequate foundation in Chinese medical theories and practice. This being the case, I would like to suggest that the minimum hours for postgraduate training be re-considered. The evidence requirements for those who have not reached that level of education seem reasonable for a practitioner who is already a member of a Chinese medical professional association, and therefore should already be practicing by the codes and guidelines of their association, as well as the Australian healthcare context.

Thank you.

Yours Sincerely,

Amber Moore