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Mr Charlie Xue
Chair
Chinese Medicine Board of Australia
Australian Health Practitioner Regulation Agency
GPO Box 9958
MELBOURNE VIC 3001

Dear Mr Xue

The AMA has reviewed the proposed guidelines on advertising, mandatory reporting, patient records, and code of conduct for Chinese medicine practitioners.

In making our submission we have considered the consistency of the proposed codes and guidelines with those for the other health professions under the *Health Practitioner Regulation National Law Act 2009* (the National Law).

Advertising guidelines

We do not agree with the removal of the section advising on the acceptable use of the title 'Dr'. Only people with doctorate qualifications, medical practitioners and dentists can legitimately use the title 'Dr' in the healthcare setting. Any other use would mislead members of the public into believing they are consulting or receiving treatment from a medical practitioner, or at the very least a practitioner with high-level postgraduate qualifications relevant to their registered health profession.

The proposed section advising on the acceptable use of the title 'Professor', 'Honorary Professor', 'Visiting Professor' or similar, should be removed. As far as I am aware currently no Australian University confers the title of 'Professor of Chinese Medicine'. Consequently, Chinese medicine practitioners should not be using the title or any variations of the title when advertising their services.

Patient record keeping

There should be a mandatory requirement that all patient records be kept in English for services provided in Australia. This will ensure there are no additional costs to the regulatory system in upholding the highest standard of practitioners registered under the National Law.

Yours sincerely

A handwritten signature in black ink that reads 'Steve Hambleton'. The signature is written in a cursive style and is followed by a horizontal line.

Dr Steve Hambleton
President
20 December 2012