

10 October 2011

Ms Debra Gillick
Executive Officer
Chinese Medicine Board of Australia
AHPRA, GPO Box 9958, Melbourne, 3001

Re: Consultation by the Chinese Medicine Board of Australia “Proposed mandatory registration standards”

Dear Ms Gillick

I would like to thank the Chinese Medicine Board of Australia for the opportunity to make this submission to address the “proposed mandatory registration standards” for the regulation of Chinese medicine professions.

1. Continuing professional development (CPD)

1.1 Whether you agree with the number of hours specified?

The requirement of 20 hours is reasonable and is consistent with CPD in other professions and current requirements for Chinese medicine in the state of Victoria

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

Professional issues are an important aspect of CPD. Since much of the available CPD relates to clinical practice, the Board may need to give consideration to how CPD on professional issues could be made available.

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

This is an important issue. As in the above case, the Board may need to give consideration to how such CPD could be made available.

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

Agree.

1.5 Whether you agree with the exemptions (temporary absence from practice)?

Agree.

An additional issue is access to CPD by practitioners in rural and remote areas. Much of current CPD in Chinese medicine is seminar based. Flexible delivery options may require encouragement.

2. Criminal history

The proposed standard is consistent with current arrangements in the state of Victoria.

3. English language skills

3.1 Whether the evidence requirements in the proposed standard is acceptable?

These are generally acceptable.

3.2 Whether you agree with the minimum test result levels?

Agree.

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

These are reasonable and consistent with current standards.

3.4 Whether you agree with the general exemptions?

These are reasonable and necessary.

3.5 Whether you agree with exemptions which apply to “grandparented” practitioners?

These are necessary for grandparenting and will retain expertise within the profession.

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

These are reasonable and consistent with current standards.

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

These are reasonable and consistent with current standards.

4. Professional indemnity insurance (PII)

4.1 Whether you agree with the minimum cover for a single claim?

Agree. These are consistent with current standards.

4.2 Whether you agree with the other minimum requirements?

Agree. These are consistent with current standards.

4.3 What you think about the proposal to rely on a self-declaration that compliant insurance is in place?

Agree. This approach may reduce paperwork.

5. Recency of practice

5.1 Whether you agree with the period of 3 years?

Agree.

5.2 Whether you agree with who it applies to (see the scope of application)?

Agree.

5.3 Whether you agree with the exemptions?

Agree.

5.4 Whether you agree with the definition of practice?

This may require some further clarification to indicate that both 'clinical practice' and 'non-clinical practice' in the Chinese medicine field are included within the scope of the term "practice".

7. Grandparenting provisions

7.1 Whether you agree with the qualifications standards?

Agree. These are consistent with standards applied in Victoria.

7.2 Whether you agree with the types of practice evidence requested?

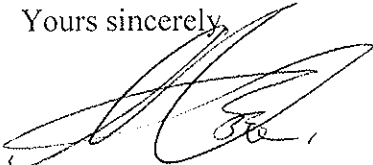
Agree. These are consistent with standards applied in Victoria.

7.3 Whether you agree with the types of competence evidence requested?

Agree. These are consistent with standards applied in Victoria.

I wish you all the very best for the implementation of the registration standards. Should you require further information or clarification, please do not hesitate to contact me (tony.zhang@rmit.edu.au Tel 03-99257758, Fax: 03-99257178).

Yours sincerely,



Dr Tony Zhang
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