

***The Society of Chinese Medicine and Acupuncture of WA Inc. - Exposure Draft Submission***

**Submission:** EXPOSURE DRAFT OF THE HEALTH PRACTITIONER REGULATION NATIONAL LAW 2009

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**Independent accreditation functions**

**In place currently is accreditation and assessment to obtain an Australian Provider Number (APN) for the modalities within Traditional Chinese Medicine (Acupuncture, Herbal Medicine and Chinese Massage/Tiu-na). Please allow consideration for implementation of National Entity's endorsed under these standards being:**

*'The Private Health Insurance (Accreditation) Rules 2008'* delivered by the Federal Government and enforced from July 1st, 2009 stipulates accreditation standards (Rule 10) for a National entity to be recognized:

Rule 10 of *'The Private Health Insurance (Accreditation) Rules 2008'*, requirements for a **recognized National Entity (Association Inc)** requires its members to be assessed under these suggested guidelines and conducts assessments of its members which require the accreditation as suggested being; competency of training and educational requirements including continuing professional education; professional indemnity insurance (required amount stipulated); senior first aid certification; and compliance with the Code of Conduct and procedures for handling disputes etc.

National private health group funds have issued these rules for National Entity's/Associations Inc. to be able to obtain an Australian Provider Number (APN) for its registered members. Continual recognition for APN requires annual assessment, random auditing of its members and monthly listing onto its register of any membership changes.

**Changes to registers**

The need for a specialist registers for Chinese Medicine Practitioners to define 'Acupuncture'.

- ✚ International standards of Acupuncture include post-graduate study and practice of specialized techniques. National registration should incorporate registration as practicing acupuncture with a description of the types of needles in common use within the practice of clinical acupuncture. Of the traditional nine needles, the

filiform needle is one which is generally associated with acupuncture use in Australia. Other types such as the embedding needles commonly used for auricular acupuncture, and the 'plum blossom' needle, are also widely used and considered as acupuncture treatment inclusive with current CMRBV registration. This should be noted as **general registration**.

- ✚ The practice of 'specialized acupuncture techniques' is a innovative progression of acupuncture which is considered a new branch of Traditional Chinese Medicine integrating the theory of both Chinese and Western medicine. It is considered a modern specialized technique of Traditional Chinese Medicine and acupuncture and currently in use receiving excellent clinical outcomes and international recognition used within the Western Hospital settings as integrative palliative care/pain treatment. Inclusion as **specialist** registration for Practitioners with specialized /post-graduate training is required. This may be an area of specialist in both the Chinese Medicine National registration board and Medical National registration board.

**Please Note:** A recent publication, '*Randomized controlled trial of a special acupuncture technique for pain after thoracotomy.*' [Deng G](#) et al. Integrative Medicine Service, Department of Medicine, Memorial Sloan-Kettering Cancer Centre, New York, New York 10021, USA. Indicates by title that it is 'special acupuncture technique' which clearly is not as it requires surgical implantation of embedded needles, hospitalization for >6weeks and defies the infection control guidelines for Acupuncture. It established the necessity to clarify general and specialist and also the term 'Special acupuncture technique'.

### **Handling of complaints**

Current handling of complaints and the nature of complaints handled by the only registered board in Australian for Chinese Medicine Practitioners, allowed complaints made by 'one party' against many Chinese Medicine Practitioners including parties outside the registered state for minor findings. A State/National Registration board main directive is to protect the public from harm but also a need to protect Chinese Medicine Practitioners.

Circumstances as such require consideration as to not unduly subject Practitioners stress resulting in personal and professional hardship for minor matters. Clear communication and common sense to resolve minor matters needed to be addressed which indicates a problem with definition of complaints and persons given jurisdiction to resolve complaints without prior consultation with the registration board. A single person to decide and resolve minor matters clearly does not work.

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