

02-10-2008

ATTENTION

Practitioner Regulation Subcommittee

NRAIP@dhs.vic.gov.au

Dear Sir/ Madam,

I am making a submission on behalf of the New South Wales Association of Chinese Medicine Inc. to the Practitioner Regulation Subcommittee of the National Registration and Accreditation Scheme for Chinese Medicine to be included as one of the health occupations in the national registration and accreditation scheme for the health professions.

The New South Wales Association of Chinese Medicine (NSWACM) is one of the most highly qualified professional organizations of Chinese Medicine in Australia. We have always supported and promoted the registration of Chinese Medicine in NSW and Australia. We strongly believe that it is vital for the inclusion of Chinese medicine into the National Registration and Accreditation Scheme for the Health Professions.

A national registration and accreditation scheme for the profession of Chinese Medicine would be entirely practicable. Evidence from the Chinese Medicine Registration Board of Victoria strongly supports the role of statutory regulation in protecting the public. We would like to specifically address the AHMAC criteria as following:

Criterion 1: Is it appropriate for Health Ministers to exercise responsibility for regulating the occupation in question, or does the occupation more appropriately fall within the domain of another Ministry?

It is absolutely appropriate for Health Ministers to exercise responsibility for regulating the Chinese Medicine profession.

Criterion 2: Do the activities of the occupation pose a significant risk of harm to the health and safety of the public?

The activities of Chinese Medicine could potentially pose some risk of harm to the health and safety of the public but no more and less than the other existing registered health occupations.

Criterion 3: Do existing regulatory or other mechanisms fail to address health and safety issues?

Existing regulatory bodies which include a number of professional associations representing Chinese Medicine across NSW and Australia fail to address health and safety issues in the Chinese Medicine profession. Rather than one peak body, with different interests and capabilities to assess education standards in a rigorous and transparent manner, self-regulation of practice and education standards within the profession is proving to be extremely difficult.

Criterion 4: Is regulation possible to implement for the occupation in question?

Regulation is possible as the profession of Chinese Medicine is well defined. In NSW, there has been formal education and training of Chinese Medicine delivered in major Australian universities and private educational institutes. Functional competencies are defined for courses within Universities and colleges. NSWACM requires their members to have a minimum of graduate degree from medical university of universities of Chinese Medicine in China or Australia. Minimum level of training in Bachelor degree and this requirement has been extended to Master's degree as a program of continuous education for practitioners of Chinese Medicine.

Criterion 5: Is regulation practical to implement for the occupation in question?

Implementation of statutory regulation has clearly been demonstrated to be practical within the State of Victoria. A tremendous amount of work has already been completed in developing the legislation for statutory regulation of Chinese medicine in Victoria. The registration of Chinese Medicine act has been successfully implemented. We are following the Victorian model that has been working and could be applied nation-wide.

Criterion 6: Do the benefits to the public of regulation clearly outweigh the potential Negative impact of such regulation?

The evidence provided by the Chinese Medicine Registration Board clearly demonstrates the important role of the Board in maintaining standards of practice and ensuring mechanisms by which the public may seek resources in cases where professional standards have been lacking. The experience of the Victorian model suggests that the benefits of statutory regulation to the public clearly outweigh any potential negative impact of regulation.

With all the above benefits listed under each criterion, I would like to request that the Subcommittee of the National Registration and Accreditation Scheme would consider including Chinese Medicine as one of the health occupations in the national registration and accreditation scheme for the health professions.

Yours sincerely,

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