


Registration Arrangements Submission
Attention: Practitioners Regulation Subcommittee
At nraip@dhs.vic.gov.au

The Chiropractic & Osteopathic College of Australasia (COCA) would like to submit the following comments and recommendations to the Consultation Paper.

We are one of the peak bodies for the supply of Continuing Education to Chiropractors and Osteopaths in Australia and represent the interests of some 1000 members.

Regards,



Dr. Dale Comrie
(B.app.Sc. Chiropractic)
National President, Chiropractic & Osteopathic College of Australasia

National Registration & Accreditation Scheme for the Health Professions - Consultation Paper COMMENTS

4.1 Application for registration

We support Proposal 4.1.1 but have concerns about verifying the authenticity of documents on-line. We would recommend that the 'accompanying information reasonably required by the responsible board' should include legal declarations, evidence of continuing education compliance etc...

4.2 Information required on initial application

Agreement with Proposal 4.2.1

4.3 Criminal History Checks

We would support Proposal 4.3.1 Option 2.

Criminal History checks are considered important and we would recommend that they be applied to all new registrants and existing registrants from the onset 1 July 2010.

5. Qualifications for registration

Agree with Proposals 5.1, 5.2 & 5.3

6.1. Powers of Boards before deciding applications for registration

Agree with the proposed powers (Proposal 6.1.1) of the board to decide on an application.

Agree with Proposal 6.1.2: the use of the term 'Health Assessment' rather than Medical Examination.

6.2 Who makes registration decisions

Agree with Proposals 6.2.1 & 6.2.2

6.3 Professional Indemnity Insurance

We support the Proposals 6.3.1 & 6.3.2.

We believe that PII is essential for the safety of the public and that the relevant national boards are best place to set the guidelines for acceptable PII for its registrants.

6.4 Powers to refuse to grant registration

Agree with Proposal 6.4.1 and would recommend that the application form AND renewal forms require declarations with respect to each item.

Agree with Proposal 6.4.2.

6.5 Refusal process

Agree with Proposal 6.5.1 & 6.5.2

6.6 Rights of review of registration decisions

Agree with Proposal 6.6.1 and note that future consultation papers will deal with this issue further. With respect to the legislation making this a 'merits review' we have concerns that this may make decisions of the relevant boards more open to challenge and overturning in forums such as Civil and Administrative Councils?

7. Types of registration

Agree with Proposal 7.1

7.3 Non-practicing registrants

Agree with Proposal 7.3.1 and recommend Boards hold 'non-practicing categories' of registration. We are unsure if 'non-practicing' Chiropractors and Osteopaths would be able to lecture, research or speak at continuing education events?

Agree with Proposal 7.3.2; which we would interpret to be that 'non-practicing' registrants would be committing an offence if they provided care to family or friends.

7.4 Student registration

We would recommend Option 2 as the best fit for the professions of Chiropractic & Osteopathy. It accounts for students undertaking field observation and experience during their course, and allows students to have more interactive patient contact during their field experience. This is in the best interests of the profession and the public's safety.

7.5 Corporate registration

Proposal 7.5 is unlikely to be relevant to Chiropractors or Osteopaths.

8.1 Title protection

Agree with Titles proposed to be restricted in Table 2.

Agree with Proposal 8.1.1.

8.5 Restrictions on spinal manipulation

Agree with Proposal 8.5.1.

Our comments are: that only those professions that have had specific and qualified training, should be able perform spinal manipulation. This is in the best interests of public safety.

Chiropractors and Osteopaths are skilled in the area of spinal manipulation. The literature can be interpreted that the risk of complication following spinal manipulation is reduced when performed by skilled practitioners.

We would propose that spinal manipulation should encompass the broad spectrum of the entire spine, as complications are not restricted to the cervical spine alone.

9.2 Continuing competency requirements

Agree with Proposal 9.2.1

We believe COCA is a key stakeholder in the production of Continuing Education for Chiropractors and Osteopaths and is ideally positioned to help the relevant Boards develop standards for continuing competence.

Agree with Proposal 9.2.2

Continuing competence requirements are essential for public safety and we recommend external bodies should be able run and report 'competency' to the Boards. We also recommend that there should be a review process for those not meeting the 'continuing competency requirements' due to health or other reasons, and that imposing basic conditions such as having to make up the hours be imposed (where applicable).

9.3 Annual reporting obligations on registrants

Agree with Proposal 9.3.1

9.4 Monitoring the professional competence of registrants

Agree with Proposals 9.4.1, 9.4.2 and 9.4.3

10. Endorsement of registration

Agree with Proposal 10.1.1

There needs to be considerations such as in item (iv.) for professions such as Chiropractic and Osteopathy to have future scope to endorse specialties. In Chiropractic there is movement towards specializing in areas such as sports, pediatrics, neurology and animal chiropractic.

Agree with Proposal 10.1.3

There appears to be a mis-numbering at this point!

We agree with the sentiments of the note following the proposal, as per our suggestions in 10.1.1.

Agree with Proposal 10.3.1

11.1 Duration of registration

Agree with Proposal 11.1.1

11.2 Registration certificates

Agree with Proposal 11.2.1, 11.2.2 & 11.2.3

Agree with Proposal 11.2.4

We believe notification of change of address is an important issue and a penalty should apply for failure to comply.

Agree with Proposal 11.2.5

There should be provisions for those who offer locum/mobile services and we believe that only the 'main' practice address needs to be supplied.

11.3 Failure to renew

Agree with Proposal 11.3.1

A three month grace period, with a reminder to renew, should be the standard.

11.4 Reinstatement to the register

Agree with Proposal **11.4.1**

We agree that there should be provisions for reinstatement if practitioners re-apply within a 2 year period and some re-training (to be determined by the Board) if the practitioners registration has lapsed longer than 5 years.

11.5 Removal from the register

Agree with Proposal **11.5.1**

12.1 Transitional provisions

Agree with Proposal **12.1**