



Response to draft registration standard for endorsement for acupuncture

The Australian Medical Council (AMC) welcomes the opportunity to comment on the Medical Board of Australia's draft registration standard for endorsement for acupuncture.

The Australian Medical Council

The AMC is an independent national standards and assessment body for medical education and training. Its purpose is to ensure that standards of education, training and assessment of the medical profession promote and protect the health of the Australian community.

The AMC is the designated accreditation authority for medicine. It has assessed and accredited medical programs offered by university medical schools since 1985. It developed and implemented a process for assessing specialist medical training programs in 2002, which builds on this accreditation process. The AMC's response to the draft standard draws on this experience.

The AMC understands that the requirement to develop a registration standard for the endorsement for acupuncture of health practitioners derives from the National Law. In response to earlier consultation papers concerning the development of accreditation standards for programs to prepare practitioners from a range of health disciplines to practise acupuncture, the AMC raised concerns about the development of cross-profession standards given the heterogeneity of the experience, knowledge and skills of the practitioners who would enter such programs and seek endorsement to register as an acupuncturist. It had similar concerns about the possibility of a cross-profession registration standard for endorsement for acupuncture. It commends the decision of the Medical Board of Australia to develop a specific registration standard for the endorsement for registered medical practitioners who wish to use the title acupuncturist. This approach enables the Medical Board to set a registration standard that recognises the extended education and training of registered medical practitioners, and defines the additional and limited education and training necessary for those who wish to use the title acupuncturist.

The AMC considers that the Medical Board's draft standard is a practical response to the challenges of the National Law.

The AMC makes the following specific comments on the draft standard:

Both the draft registration standard and the background paper make clear that medical practitioners who wish to use the title "acupuncturist" must either have their registration endorsed for acupuncture by the Medical Board of Australia or be registered by the Chinese

Medicine Board of Australia. Page 2 of the Background paper also explains “It should be noted that the practice of acupuncture is not in itself a protected practice.” This additional information provides useful clarification for practitioners who may be considering seeking endorsement. It would be helpful to include this information in the summary information on page 1 of the registration standard.

Page 2 of the draft registration standard provides the following statement “The Medical Board of Australia considers that medical practitioners who have been practising acupuncture up to 30 June 2012, who have been undertaking relevant CPD and who are qualified for general and/or specialist registration to have a qualification that is substantially equivalent to, or based on similar competencies, to the approved qualification.” The meaning of this statement is unclear. Suggest rewrite as “have to have a qualification that is substantially equivalent to....”

Page 3 of the draft registration standard indicates that “Medical practitioners who are on the Specialists Register and who are endorsed for acupuncture are required to comply with the CPD requirements of their specialist college. If possible, practitioners should include CPD activities related to acupuncture within their college program. If this is not available, they should undertake a minimum of 10 hours per year additional self-directed CPD that is relevant to acupuncture. Alternatively, they can complete another AMC accredited specialist college’s CPD requirements for acupuncture. In these instances, the AMC understands “specialist college” to mean an education provider for specialist medical programs of study and continuing professional development programs. The AMC accreditation procedures and the approved accreditation standards for specialist medical programs and continuing professional development programs have always recognised that while such programs have traditionally been provided by specialist medical colleges, other models might apply. For these reasons the standards refer to “education providers” rather than “specialist medical colleges”. It may be helpful to annotate the draft registration standard or change the terminology, so it is clear. There are a number of specialist medical colleges which are not accredited by the AMC and do not provide training in a recognised medical specialty.

The Board may wish to consider specifying the wording that will appear on the register for medical practitioners who have endorsement as acupuncturists.

As requested by the Medical Board, the AMC is undertaking additional work to develop accreditation standards for the approval of programs of study for endorsement of medical practitioners as acupuncturists.

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