



Consumers
Health Forum
of Australia

11 May 2012

Executive Officer
Medical
c/- AHPRA
GPO BOX 9958
Melbourne
Victoria 3001



Dear Sir / Madam

Consultation – endorsement for acupuncture

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide input to the Medical Board of Australia (the Board) on the proposed standard for endorsement of registration for acupuncture for registered medical practitioners to practice as “acupuncturists”.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF welcomes the establishment of practice, registration and accreditation standards for healthcare services. We have previously provided submissions on the National Registration and Accreditation Scheme (NRAS) which was established by the Council of Australian Governments (COAG) in March 2008. CHF welcomed the establishment of NRAS, as it has the potential to increase the safety and quality of health services and close the gaps and inconsistencies between the states and between professions.

CHF also welcomed the work of the Australian Physiotherapy Council to develop an accreditation standard for the assessment of programs of study relevant to the endorsement of a registered health practitioner to practice as an acupuncturist.

We therefore welcome the Board’s work to develop a standard for endorsement of registration for both practitioners who have an approved qualification, and practitioners who have been performing acupuncture recently and who have been undertaking relevant continuous professional development. We have reviewed the proposals for the inclusion of these grandparenting arrangements in the standard for endorsement of registration and some brief comments are provided below.

Comments on the Proposed Standard

Medical practitioners who were practicing acupuncture before 1 July 2012 who do not have approved qualifications for acupuncture

The consultation paper states that practitioners who were practicing acupuncture before 1 July 2012, who do not have approved qualifications for acupuncture, can apply for endorsement up to 1 July 2015. However, the grandparenting provisions only apply to the Joint Consultative Committee on Medical Acupuncture (JCCMA) accredited medical practitioners up to this date. CHF seeks clarification within the standard as to the eligibility to apply for endorsement between 1 July 2012 and 1 July 2015 for medical practitioners who have made 25 or more acupuncture-related claims under Medicare item number 173, which does not require medical practitioners to have accreditation with the JCCMA to attract benefits.

CHF notes that sections 1.a. and 1.b. of the proposed standard state that applicants are required to fulfil the continuing professional development standards. CHF would like the standard to specify that applicants must comply with the approved registration standard for continuing professional development, in addition to the detailed explanation of continuing professional development provided.

Thank you for the opportunity to provide input into the development of the registration standard for endorsement for acupuncture for registered medical practitioners. We look forward to the outcomes of the consultation. If you would like to discuss the issues raised in this submission in more detail, please contact CHF Policy Officer, Jo Talbot, on [REDACTED]

Yours sincerely,



Carol Bennett
CHIEF EXECUTIVE OFFICER