

## Position statement

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1 July 2025

### CMBA position statement on the future of the Guidelines on patient health records

#### Background

The *Guidelines on patient health records* (the guidelines) were first published in 2012 when the profession of Chinese medicine was first regulated under the National Registration and Accreditation Scheme (the National Scheme) and were reviewed in 2016 and 2024. The guidelines set out the expected minimum standard for record making.

The guidelines are unique in the National Scheme as they are the only guidelines that permit some practitioners to make health records in a language other than English. This exemption is allowed for practitioners with English language conditions, who were registered under grandparenting arrangements from 1 July 2012 to 30 June 2015 under section 303 of the National Law.

#### Feedback from the public consultation

In 2024 the Board conducted a public consultation on the proposed revised *Guidelines on patient health records* (the proposed revised guidelines). The Board proposed that all Chinese medicine practitioners would be required to make patient health records in English. The Board proposed these changes to reduce the risk of harm to public, to improve continuity of care for patients and to improve regulatory alignment.

The most common type of feedback the Board received at consultation was that affected practitioners needed more time to prepare to make health records in English to a high standard.

In considering feedback, the Board decided to update the revised guidelines so that practitioners with English language conditions are required to make more parts of their health records in English than is currently required, but not the full record. This adjustment will take steps toward addressing the Board's concerns while not overburdening impacted practitioners.

#### Board intention for the future of the guidelines

The Board's position remains that there is risk to the public where patient health records are not made in English. At the next review of the guidelines, it will be the Board's preferred option that the guidelines will introduce the requirement that all Chinese medicine practitioners must make full patient health records in English. The Board encourages all practitioners with English language conditions to use the intervening time to prepare their practice to make full records in English.