



INCORPORATING:
AUSTRALIAN ACUPUNCTURE
ASSOCIATION
ACUPUNCTURE ETHICS &
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**Re: Public consultation on a review of the English language skills
and Criminal history registration standards**

Thank you for providing the opportunity to comment on the review of the English language skills and Criminal history registration standards.

The Australian Acupuncture and Chinese Medicine Association Ltd (AACMA) is the peak national professional association of qualified and registered practitioners of Chinese medicine (acupuncture, Chinese herbal medicine, and Chinese manual therapies). We represent over 2100 member in all Australian States and Territories.

Please find our comments outlined below.

CRIMINAL HISTORY REGISTRATION STANDARD

AACMA supports Option 1 – the status quo – with one proviso. The Criminal History checks must be broad enough to collect information on fair trading and consumer protection prosecutions.

ENGLISH LANGUAGE SKILLS REGISTRATION STANDARD

AACMA supports Option 2 to allow more flexibility and options for applicants to demonstrate their English language skills.

Please note additional comments on the content of Option 2.

How is the current registration standard working?

The impact of the current standard is difficult to assess as it has not actually come into effect for Chinese medicine. The grandparenting standard will continue to apply until 30 June 2015.

Approved Countries

AACMA supports maintaining the current list; that is, not removing South Africa from the list and not adding the additional countries. It is noted that, in contrast with the countries on the existing list, English is not the dominant language of communication in the suggested additional countries.

Multiple sittings

AACMA supports the current position applied by the Chinese Medicine Board in allowing for an average IELTS score of 7 with no individual tests being below 6.5. This allows for the situation where an applicant's overall performance satisfies the expected standard but has fallen slightly below in one or two areas. This also means that in other components of the test the applicant must have performed at a level above the required standard.

Multiple sittings should be permitted, particularly if the policy requiring the applicants to have met the overall standard for each test component is to apply, as opposed to allowing some components to be slightly below the standard. There would need to be a time limit for re-sits (for example, 12 months, to allow sufficient time to improve the relevant skills).

Draft revised standards

What must I do? Points 1 & 2

The proposed revised standard under Point 1 appears to allow for a significantly reduced number of years of full-time study to demonstrate competence, compared with existing standards, at least as far as Chinese medicine is concerned. For example, an applicant completed two years of compliant secondary education plus a part-time board-approved qualification equivalent to 1.5 years full-time study. Total number of years is 3.5 years full-time study.

In contrast, Point 2 of the proposed revised standard appears to increase the required number of years of eligible full-time study from 5 years to 6 years (as far as Chinese medicine is concerned), plus the six years need to be continuous. This would not allow for a break between studies for whatever reason.

It is noted that the draft revised policy, as outlined in Points 1 and 2, appears to have removed the option of years of full-time education to be in any field, but now requires those studies to have included studies in the relevant profession. While we do not object to this on principle, it should have been overtly stated in the paper.

What must I do? Point 4(b)

Please note, there is also no Occupational English Test for Chinese medicine. For this reason, the TOEFL test should also remain as an option for Chinese medicine.

Please contact me at the AACMA national office on [REDACTED] if you wish to discuss the contents of this submission.

Yours faithfully

[REDACTED]
Judy James
AACMA CEO