



Federation of Chinese Medicine &
Acupuncture Societies of Australia Ltd.
澳洲全國中醫藥針灸學會聯合會 (National Body)

FCMA

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standard.consultation@ahpra.gov.au

To AHPRA:

**Re: Review of Criminal History Registration Standard and English Language Skills
Registration Standard**

The Federation of Chinese Medicine & Acupuncture Society of Australia Ltd (FCMA) is a national organisation that has representation in every Australian state and territory and it is also a member of the Professions Reference Group established by Australian Health Practitioner Regulation Agency (AHPRA). The FCMA wishes to thank AHPRA for the opportunity to respond to the above document on behalf of its Chinese medicine and acupuncture practitioners and herbal dispensers.

Review of criminal history registration standard

Regarding the review of criminal history registration standard, the FCMA would like to continue with the current process and supports the National Boards preference for Option 1. The FCMA considers the registration and current process to be fair and looks forward to the next review.

Review of English language skills registration standard

Chinese Medicine is recognised by the World Health Organization (WHO) to be a health care system in its own right. Its philosophical underpinning is unique as well as the Chinese language. Yet, its health care modalities are recognised and adopted by many English-speaking countries including Australia. Many Chinese medicine practitioners in Australia are graduates from Mainland China. Their main language is Chinese. It is from this perspective that the FCMA would like to offer suggestions.

Applicants with secondary and tertiary English language skills

The FCMA doubts the need of at least six years full time study outlined in the proposed revised registration standard ¹ and suggests that applicants with minimum of five (5) years full time study of a program approved by the Chinese Medicine Board of Australia (CMBA) should be exempt from English language skills testing. The FCMA is aware that some Chinese medicine practitioners applying for registration with the CMBA may not have acquired English language skills throughout secondary schooling but could have acquired the skills in less than the total years of secondary education or have acquired the language skills by other forms of tuition. If their language skills are adequate for them to be accepted into English medium tertiary education, we suggest that these applicants also be exempt from English language skills testing. It stands to reason that the language skills would have been adequate for them to cope with English medium education at a tertiary level.

Applicants who require English language skills test

The FCMA agrees that it is necessary for Chinese medicine practitioners to be able to communicate with English speaking clients in Australia. We suggest the requirement of practitioners with overseas qualifications and applying for registration with the CMBA after 30 June 2015 to achieve:

- an overall score of minimum 6.0 for the International English Language Testing System (IELTS) with no element below 6.0 or equivalent level of the American Test of English as a Foreign Language (TOEFL).
- The FCMA would like to provide its assistance to the test provider for inclusion of Chinese medicine profession in the Occupational English Tests (OET) in future.

The FCMA believes that score of 6.0 in IELTS is adequate for Chinese medicine practitioners competently to communicate with their patients in a daily Chinese medicine practice in Australia as score of 6.0 in IELTS indicates a competent user of English ². This is also consistent with the previous English proficiency standard issued by the Chinese Medicine Registration Board of Victoria (CMRBV) and Transition arrangement (2A) issued by the CMBA and approved by the Australian Health Workforce Ministerial Council in December 2011. We do not support the intention of increase the score of IELTS to 7.0 for Chinese medicine profession unless the CMBA has found conclusive evidence that score of 6.0 in IELTS or equivalence is insufficient to Chinese medicine practitioners for purpose of effective communication with their patients in Australia.

¹ “Extended studies undertaken solely in English, when you have undertaken and satisfactorily completed at least six years (full time equivalent) continuous education taught and assessed solely in English in any of the recognised countries, which includes a tertiary qualification in the relevant professional discipline or a Board approved program of study for the <xx>profession.” Review of Criminal History Registration Standard and English Language Skills Registration Standard 2013.

² http://www.ielts.org/institutions/test_format_and_results/ielts_band_scores.aspx accessed on 16 December 2013.

The FCMA would prefer that the English language test results be recognised as valid for three (3) years rather than the current two (2) years. This consideration is made in the light of the research showing that there is minimal change in language skills up to four (4) years even with no use.

Test providers advised that the validity and reliability of results from multiple test sittings depend on how the individual test are constructed; the onus is, therefore, on the developers to improve on the validity and reliability of the tests. According to the IELTS system, since, performance in the four skill areas (reading, writing, listening and speaking) is combined to maximise on one reliable composite assessment of a candidate's overall language proficiency at a given point in time, separate assessment for each skill would be unnecessary.

Notwithstanding the English language skills acquisition required by the draft document, the individual applicant must be assessed on his or her own merit in terms of the institution/s in which the applicant had been educated; and also to look beyond the countries recognised to be of native English speaking countries. Given the current level of globalisation and learning of English language worldwide, the requirements in the document might eventually be discriminating and unwittingly leads to the prevention of good practitioners from practising in Australia. This also prevents competition and the public from choices of good, competent practitioners.

The FCMA hopes that AHPRA would consider the suggestions provided and looks forward to the next review.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Tzi Chiagn Lin', with a horizontal line underneath the name.

Professor Tzi Chiagn Lin PhD, J.P.

President, FCMA