

12 April 2021

Executive Officer
Medical, AHPRA
GPO Box 9958
Melbourne VIC 3001
Email: medboardconsultation@ahpra.gov.au

Dear Executive Officer

Re. Medical Board of Australia – Consultation on proposed changes to the registration standard for acupuncture endorsement

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide feedback on the *Draft revised registration standard: Endorsement of registration for acupuncture for registered medical practitioners*.

The RACGP is Australia's largest professional general practice organisation, representing over 40,000 members working in or toward a career in general practice. The RACGP is responsible for:

- defining the nature and scope of the discipline
- setting the standards and curricula for training
- maintaining the standards for quality general practice
- supporting specialist general practitioners (GPs) in their pursuit of excellence in patient and community health service provision.

The RACGP provides the following comment regarding the Medical Board of Australia's questions to the draft revised standards.

1. From your perspective, how is the current standard working?

The current standard is working well. Notably, there has been no change in the insurance classification for GPs providing Medical Acupuncture – non-procedural insurance cover. However, aspects of the current standard may be confusing given it includes outdated information about grandfathering, which expired in 2015.

2. Is the content and structure of the draft revised standard helpful, clear, relevant and more workable than the current standard?

Yes, it is clearer in that it sets out 'Does this standard apply to me?' and 'What must I do?'

It also does not contain confusing and outdated information.

3. Is there any content that needs to be changed, added or deleted in the draft revised standard?

The RACGP recommends changing the wording in the Background paragraph:

The National Law provides for the endorsement of registration for acupuncture for registered health practitioners. It is a breach of the National Law for a person to take or use the title 'acupuncturist' if that person is *not registered by the Chinese Medicine Board of Australia or if their registration has not been endorsed by one of the National Health Practitioner Boards*.

4. Are there any impacts for patients and consumers, particularly vulnerable members of the community that have not been considered in the draft revised standard?

This standard is written for the medical practitioners that practice acupuncture in their clinical setting. The availability of acupuncture services from registered medical practitioners with endorsement for acupuncture needs to be made accessible to patients, including patients from non-english speaking backgrounds, with low vision and/or poor health literacy. This ensures patients and consumers have a clear understanding of the services being offered and can make an informed choice.

5. Are there any impacts for Aboriginal and Torres Strait Islander Peoples that have not been considered in the draft revised standard?

No change required.

6. Do you have any other comments on the draft revised standard?

We thank the Medical Board for taking this opportunity to review its guidelines on acupuncture and how it applies to medical practitioners.

Please contact [REDACTED], on [REDACTED] or at [REDACTED] if you have any questions or comments regarding this submission.

Yours sincerely,

[REDACTED]

Dr Karen Price
President