



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

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To the Secretary,

For Draft Revised English Language Skills Registration Standards, Ahpra

AHPRA.consultation@ahpra.gov.au

Dear Secretary

Re. Public Consultation: For English Language Skills Registration Standards

Thank you for the opportunity to respond to the document on the Draft revised English Language Skill (ELS) Registration Standard. This submission is made on behalf of the Federation of Chinese Medicine & Acupuncture Societies of Australia (FCMA). In representing our members who are solely practitioners of Chinese medicine, we have responded to issues that might implicate our profession rather than to the document in general. The following are our comments.

Questions and comments

1. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

The content, language and structure of the proposed revised ELS standards are clear relevant and workable as appears on the document. Areas where issues might present will be mentioned under the relevant following questions.

2. Is there any content that needs to be changed, added or removed in the proposed revised ELS standards? If so, please give details.

Areas where issues might present are mentioned under the relevant questions.

3. Are the proposed pathways clear, relevant and workable? Why or why not?

The proposed pathways are clear but in the implementation, would Ahpra apply consistency in recognition of the various courses offered by countries where ELS is not recognised by Ahpra; and in the registration of applicants from these countries.

School Education Pathway

The example provided qualifies Anna for registration as she had completed her schooling in Australia, but her chiropractic qualification is completed in a country which English is not recognised.

If the above example is applied to one who has completed schooling in Australia and studied Chinese medicine and acupuncture in a non English country for example Mainland China, would the practitioner be registered by the Chinese Medicine Board of Australia (the Board)? Some of the best Chinese Medicine programs are offered by countries which ELS is not recognised in Australia.

Advanced Education Pathway

The example of Juan who comes from a country which ELS is not recognised but had completed a physiotherapy degree in an Australian university and went on to complete a Master of Physiotherapy qualifies him for registration. This gives the impression that he has to complete a higher degree after his basic degree to qualify for registration. This is inconsistent when compared to the requirements of the Test Pathway. The higher degree for Juan could be removed; if this is not an expectation for registration. To be able to study in an Australian University, he would have met the English standards described in the various tests under the Test Pathway to be enrolled locally. After completion of the physiotherapy program, he would be expected to qualify for registration.

It would be expected that some Chinese medicine practitioners would have gone through the same pathway as Juan. These applicants could be given registration without question; and not need to complete a higher education degree. It is not rationale and illogical someone has successfully completed a Board recognised program conducted in English in Ahpra recognised country for registration purpose but still not able to be registered by the Board.

Test Pathway

The example given of Eliza who came from France to complete an occupational therapist degree in

Australia is no different from Juan's experience. She would have to meet the English requirement to be accepted by an Australian university. This example provided under the Test Pathway may not be appropriate. There would be graduates of Chinese medicine from Australian universities who come from countries which the ELS is not recognised but would have taken the English tests, met the standards and excepted in Australian universities. They would, similarly, qualify for registration after graduation.

We believe that the Test Pathway be applied to those who completed their school education and university education in countries where ELS is currently not recognised in Australia.

The Test Pathway would be considered the best option for applicants who schooled and studied in a university in a country where ELS is not currently recognised in Australia.

4. Are the new names for the pathways helpful; and clear? Why or why not?

The names for the different pathways are clear, but the implementation might cause inconsistencies with recognition of practitioners in the different professions.

5. Is it helpful to include examples in the definitions sections of the ELS standards for example those included in the full-time equivalent definition or would the samples be better placed in the supporting material (for example in Frequently asked questions)? Why or why not?

The same could be repeated in the Frequently Asked Questions for ease of understanding the answers without the need to cross-reference.

6. Is the proposed change to the timeline period for accepting test results, from two test sittings from a maximum of six months, workable? Why or why not?

This is acceptable as this gives the applicant more time to improve on the English skill.

7. Is there anything else the National Boards should consider in its proposal to revise the ELS standards?

Which pathway would be suitable to an Australian with native ELS and has completed his/her qualification in a non English country? Does an Australian with native ELS need to sit an English test to be qualified for registration if he/she holds an overseas qualification conducted in non recognised country?

8. Are there any additional considerations National Boards should be aware of when deciding whether to approve a new test modality or type by and accepted English language test provider as suitable for the purposes of meeting the ELS standard?

We believe that exceptions could be made for professionals from Malaysia, Singapore and Hong Kong. There are English schools in these countries that offer high standards of English in the primary and secondary systems. There are also international schools in these countries which one of the goals is to offer high standards of English. In these countries, there are also universities recognised in Australia which conduct their courses in English. We suggest that applicants from such schooling backgrounds and universities to be accepted for registration in Chinese medicine practice without being put through any of the four ELS pathways. There would also be applicants with the same backgrounds from Mainland China who could be considered.

9. Would the proposed changes to the ELS pathways result in any adverse cost implications for practitioners, patients/clients/consumers or other stakeholders? If yes, please describe.

The Test Pathway would definitely incur cost to the applicants. Given the particular pathway to registration, the cost could be considered necessary. If our comments in Question 8 are taken into consideration, it might be potentially less costly for applicants.

We consider that if the process is made easier for applicants, the advantage is to the consumer, who would have better choices and access regarding practitioners.

10. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

If the proposed changes are followed consistently and our suggestions taken into consideration, we believe that it could be potentially more friendly to applicants for registration.

11. Would the proposed changes to the ELS standards result in any potential negative or

unintended effects? If so, please describe them.

It would be difficult to comment on the changes to the ELS standard till a period of implementation is observed.

12. Would the proposed changes to the ELS standards result in any potential negative or unintended effects for Aboriginal Torres Strait Islander Peoples? If so, please describe them.

We do not feel qualified to comment on this issue.

13. Do you have any other feedback about the ELS standards?

No

We hope that you would kindly consider our comments and suggestion.

Yours sincerely,

Prof. Tzi Chiang Lin PhD

President of FCMA

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