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Attention: Chair, Chiropractic Board of Australia
Email: natboards@dhs.vic.gov.au

The following comments from Chiropractors Association of Australia (NSW) Ltd (CAANSW) are in response to the Chiropractic Board of Australia (CBA) Consultation Paper on Codes and Guidelines

CAANSW respectfully request a response to the following comments/questions:

1. The Code of conduct for registered health practitioners has covered a broad range of issues relevant to **all** health practitioners. This document has been set out clearly and concisely. Why has the CBA deemed it necessary to introduce a profession-specific code, when no other national profession has done so?

2. The Code for professional practice for chiropractors in Australia contains repetition and unnecessary wording in a number of sections, which in turn can lead to confusion as to the purpose of the initial statement.

Specific issues of concern are as follows:

1. There seems to be a strong focus on the care of children in the Code for professional practice for chiropractors in Australia in Section 2.10. The subsections in 2.10 have already been covered in the Code of conduct in Section 3.6. Why has the CBA deemed it necessary to break this section down and reiterate when no other health profession has done so?

2. Consideration should be given to Section 2.6 – Radiology/Radiography.

   Amendment One: That chiropractic not be limited to the proposed "Red flag" list of parameters currently provided in section 2.6.2 of the draft. CAANSW propose the CBA adopt the American College of Radiology (ACR) Guidelines for the Performance of Spine Radiography in Children and Adults.[1]

   Background: Indications for radiography from a "chiropractic" registration board must acknowledge "chiropractic" related health issues and the interventions of chiropractic. The proposed red-flags list section 2.6.2 has been shortened by the standards set by nearly all international guidelines for musculoskeletal radiography. While there is some debate between international guidelines proposed for chiropractic, the ACR Guidelines are from

[1] http://www.acr.org/SecondaryMainMenuCategories/quality_safety/guidelines/pediatric/spine_radiography.aspx

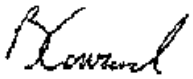
the largest radiology body world wide, the American College of Radiology, an organization of more than 30,000+ members.[2]

Section 2.6.3 is limited to cases where x-ray of children is deemed “needed” that includes “bone pathology”. CAANSW questions how the CBA propose how chiropractors work this out without x-rays in most cases?

3. There still remains the question of dual registration. Currently a joint registration fee is available for those who are registered as a chiropractor and osteopath. CAANSW seeks confirmation that this will still be the case with national registration. If not, why not?

CAANSW look forward to receiving your response to this submission in due course.

Yours sincerely,



Bryce Conrad
President
CAA (NSW) Ltd

[2] http://www.acr.org/SecondaryMainMenuCategories/quality_safety/guidelines/pediatric/spine_radiography.aspx