

23 November 2011

Dr Phillip Donato, Chiropractor
Chair
Chiropractic Board of Australia
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Dear Dr Donato

Re: Limited Registration Consultation Paper

Thank you for providing a further opportunity to forward comment on the Registration Standard for Limited Registration (released October 2011).

It is appreciated that this revised version of the proposed Standard includes changes arising from consideration of queries and comments offered on a previous draft. However, there are some Observations/Points we would offer for further consideration:

Limited Registration for teaching or research:

1. *Under Section 2, General Requirements*, (page 4), there is a note regarding CCEA's Standards for academic staff (Standard 3.1), with particular reference to the one relevant to staff teaching in Clinical Sciences or supervising students. This is helpful.

It is again recommended that note also be made of CCEA's Standards for academic staff teaching in the Basic Sciences, as it appears from our recent discussions that applicants could be wishing to teach in subjects in that category as well (see Attachment 1).

2. *Relevant and suitable qualification*: (page 6): In making its decision regarding Satisfaction "that the applicant's qualifications are suitable for the teaching..position.." , it is requested that the Board make reference to CCEA's standards for academic staff (see 1. above). It would be difficult should some differences occur that could pose potential challenges for accreditation.

Limited Registration in the Public Interest

1. *Application of the Registration standard:* (page 13): an example is given as “an overseas expert required to demonstrate or teach a procedure” – if this teaching was to be done to students engaged in a chiropractic program, then it is proposed that CCEA’s Standards for academic staff should apply. A Note as per page 5 should be considered for inclusion.
2. *Chiropractic qualification:* page 15: there is a point:
"applicants must provide evidence of their current registration status or eligibility for registration to practise chiropractic in their home jurisdiction" ;

This is likely to pose difficulties for applicants who come from jurisdictions where there is no registration regime in place (e.g. Japan and Korea).

Also - If the applicant is wishing just “to participate in a workshop/seminar” this requirement may not be necessary?

3. Renewal of Limited Registration: (page 16): if the renewal takes the registration period beyond 4 weeks (or more) (as per page 5), does/should the requirement for CPD apply as for the Teaching and Research category?
4. Definitions: (page 17): Practice: The final sentence in this definition on page 13 should be added here as well? “Any variation in the definition of practice agreed by the Board as part of a wider consultation on this issue will apply to this registration standard”.

General:

For clarity and ease of reference, it is strongly recommended that some version control be applied to these documents. There appears to have been several versions of this paper, but apart from the cover page and a watermark there is nothing to allow easy recognition of which version it is. Perhaps a footer with the month of issue could be used?

We trust these further comments might be helpful in refining the Standards, and associated procedures, and we would be pleased to discuss the relevant points at a mutually convenient time to provide any clarification, and to assist in progressing the development of the Standard for the benefit of the profession.

Yours sincerely



Dr Michael Shobbrook
Chairperson

Attachment 1.

CCEA's Standards regarding teaching in Basic Sciences:

Standard 3.1

Teaching staff in the basic sciences must have qualifications and experience well in excess of the level at which they are teaching (Masters or PhD level). These persons must have their degree in a basic science discipline closely related to their primary instructional assignment.

Standard 4.4.2

The Basic Sciences include anatomy, biochemistry, physiology, neurology, microbiology, histology, embryology, pathology, biophysics, molecular and cell biology, genetics, immunology, and other appropriate subjects.