

25 October 2012

Dr Phillip Donato
Chair, Chiropractic Board of Australia
Email: chiroboardconsultation@ahpra.gov.au

Dear Dr Donato,

Re: Stakeholder consultation: Guidelines – Clinical record keeping

This letter is written in response to the Chiropractic Board of Australia request for feedback on the draft *Guidelines – Clinical record keeping*.

The Council on Chiropractic Education Australasia (CCEA) appreciates the opportunity to comment on the draft guidelines.

With no major issues identified, the CCEA recommends the following amendment:

Section 3: lead-in: 'The following information forms part of the clinical record that is to be recorded and maintained at the initial presentation about that consultation'

While the clinical record can be recorded at the initial presentation, it cannot also be maintained at the initial presentation. The sentence should be re-phrased to clarify this.

In response to the view sought on whether the guideline should remain a stand-alone document or be appended to the Code of Conduct for Chiropractors, the CCEA recommends it remain a stand-alone document to maintain its prominence and visibility (e.g. in listings of reference documents on websites). However, consistency in relation to the manner in which other guideline documents are referenced must also be considered.

We congratulate the Board on the development of these Guidelines.

Yours sincerely

Michael Shobbrook
Chairperson