5th September 2013

Attention: Program Manager, Accreditation
Email: accreditation.unit@ahpra.gov.au

Program Manager, Accreditation,
AHPPRA, GPO Box 9958, Melbourne, 3001

Dear Sir/Madam,

RE: Accreditation standards and accreditation process for Chinese medicine

Thank you for the opportunity to provide feedback on the draft ‘Accreditation standards and accreditation process for Chinese medicine’. On behalf of the Course Advisory Committee of the Bachelor Programs in Chinese Medicine at the University of Technology Sydney, I would like to comment with regards to the draft standards.

Currently UTS has two program offerings in Chinese medicine to which the accreditation standards being proposed will apply. The two programs are:

- Bachelor of Health Science (Traditional Chinese medicine)
- Bachelor of Health Science (Traditional Chinese medicine) and International Studies

Accreditation Standards

1. These standards are intended to be outcomes focused do you think that they achieve this?

Yes.

An outcomes-focused approach taken is to be applauded and reflects contemporary thinking on teaching and learning and the role of the educator. This allows flexibility in the design and delivery of program.

2. Are the criteria in the draft standards clear?

Yes, however our committee is aware that UTS submission has identified several items where they have queries or potential concerns. They have identified and listed these in their submission and our committee support their concerns.

3. The set of standards will be used to assess whether a program of study and the education provider provides students who complete that program with the knowledge, skills and professional attributes to practice the profession.
3.1 Is the set of standards adequate for this purpose?
Yes.

3.2 Are the relevant issues covered by the draft standards?
Yes, however our committee is aware that UTS Chinese medicine has
identified several items where they have queries or potential concerns. They
have identified and listed in their submission and our committee wish to
support their concerns.

3.3 Does any content need to be changed, deleted or added?
There are a few areas where we feel further explanation are needed. These
have identified in the UTS submission and we also share the same view as
what UTS Chinese Medicine has concerned.

3.4 Are any additional standards required?
Components about how a graduating Chinese medicine practitioner be able to
attain the knowledge of fitting into the role of registered health care
practitioners in Australia as a whole should be considered.

4. What specific guidance relevant to the standards and criteria in Field 5 should
be included in the guidance document to accompany the standards, particularly
in relation to any content and/or skills you expect an education provider should
include in their curriculum?

The wide range of techniques and preparations in contemporary Chinese medicine
study should be considered. These may include (but not limited to): use of traditional
herbs, herbal preparation; granulated formula tablets; traditional acupuncture
techniques, specific acupuncture techniques, laser acupuncture, electroacupuncture,
gua sha, cupping, etc.

5. Do you have any other comments on the draft standards?
No additional comments besides the comments below.

Regards,

Dr Danforn Lim
PhD(Med)(UNSW), MBBS(UNSW), BSc(Med)(UNSW), BlllSc(CSU), DCH(Syd), ClinDipPallMed(RACP),
MMed(Syd), MAppSc(Acup)(RMIT), MAppMgt(Health)(N'castle),
Chair, Course Advisory Committee for the Bachelor Programs in Chinese
Medicine, University of Technology Sydney