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8 January, 2012

Attention: Executive Officer,
Chinese Medicine Board of Australia
AHPRA
GPO Box 9958
Melbourne VIC 3001

Email: Subject: Membership of CMBA Accreditation Committee

chinesemedicineconsultation@ahpra.gov.au

Dear Ms Gillick,

Re: Submission on the Chinese Medicine Board of Australia Accreditation Committee Membership

On behalf of New South Wales Association of Chinese Medicine (NSWACM), I thank the Chinese Medicine Board of Australia (the Board) for the opportunity to comment on the composition of the accreditation committee that the Board wishes to establish. We are pleased to share our knowledge and experiences with managing the accreditation functions for the Chinese medicine profession.

As you know, NSWACM is a branch association of the Federation of Chinese Medicine and Acupuncture Societies of Australia Ltd (FCMA), is one of the biggest professional associations of Chinese medicine¹ in New South Wales. For over twenty years NSWACM has fostered the Chinese medicine profession in New South Wales and in Australia, including through its statutory regulation.

NSWACM considers that any education for qualification of registration provided in the field of Chinese medicine should not only be academically sound but primarily reflective of the practice of Chinese medicine in a clinical setting. The practical aspect of Chinese medicine

¹Chinese medicine consists of acupuncture, Chinese herbal medicine, and herbal dispensing

education can only be maintained if the accreditation committee itself includes practitioner members.

With this in mind, NSWACM proposes that the committee includes the following members:

- at least two Chinese medicine practitioner members registered in both divisions of Chinese herbal medicine and acupuncture
- at least one educationalist – a specialist in designing courses in Chinese medicine, preferably with some exposure to practice of Chinese medicine and senior management experience gained with an educational institution
- at least one Chinese medicine academic
- two Board members.

NSWACM highly recommends that two Board members be represented on the accreditation committee. This recommendation is consistent with the Intergovernmental Agreement for a National Registration and Accreditation Scheme for the Health Professions issued by the Council of Australian Governments (COAG) on 26 March 2008². It explicitly recommended that the members of the accreditation committee should include:

- (a) Registered practitioners;
- (b) Persons with education and training expertise;
- (c) Persons who are not members of the relevant profession; and
- (d) At least two persons who are also members of the Board.³

NSWACM believes that the two Board members on the accreditation committee would be indispensable in facilitating seamless communication between the committee and the Board, thus also contributing to quality assurance of the work of the committee.

Based on the experience in Victoria, it is not necessary that the accreditation committee includes a representative of the community. The meetings of the accreditation committee will largely focus on the technical aspects of the courses provided by educational providers and, as such, will require expert knowledge of Chinese medicine theory and practice. Contributions from non-specialists may not be constructive to the work of the committee.

NSWACM suggests, however, that the committee seeks input and expert evidence from at

² COAG 2008

<http://www.ahpra.gov.au/Legislation-and-Publications/Ministerial-Directives-and-Communiques.aspx>
accessed on 27 December 2011

³ See clause 1.39 of the above

least one recent graduate from the course or institution being assessed for the purposes of accreditation. Such a graduate should preferably be a current practitioner member of Chinese medicine.

In addition, NSWACM proposes the following sub-criteria for the selection of the committee members:

- 1) The committee must maintain its independence from any Chinese medicine/acupuncture association.
- 2) Members of the committee must declare any conflict of interest potentially arising as a result of their current work, professional and other activities.
- 3) At least two committee members must be fluent in Chinese in order to facilitate communication with international authorities and be familiar with the Chinese herbal names in Chinese or Pin Yin rather than botanical names when they dealing with the accreditation of Chinese herbal medicine courses.

I hope that our input is useful to the Board and would be happy to meet with the Board members to further discuss any of the issues raised.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Chang', written in a cursive style.

Kevin Chang

President of New South Wales Association of Chinese Medicine