

**澳大利亞昆士蘭州中醫藥針灸學會**  
**Society of Chinese Medicine and Acupuncture Qld Inc**  
Phone: (07) 3344 7388, (07) 3344 3407 Fax: (07) 3343 2139

9 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](mailto:chinesemedicineconsultation@ahpra.gov.au)

Dear Ms Gillick,

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

On behalf of the Federation of Chinese Medicine and Acupuncture Societies of Australia Ltd (the FCMA), 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 experience in managing the accreditation functions for the Chinese medicine profession.

As you know, the FCMA represents the Chinese medicine<sup>1</sup> profession in Australia, with local branches in Victoria, New South Wales, Queensland, the Australian Capital Territory, South Australia and Western Australia. The FCMA has more than 600 members practising Chinese herbal medicine and/or acupuncture. For over twenty years the FCMA has fostered the Chinese medicine profession in Australia, including through its statutory regulation. The FCMA has played a leading role in introducing and implementing the statutory regulation of Chinese medicine practitioners in Victoria. This includes contributions towards the development of course approval guidelines issued by The Chinese Medicine Registration Board of Victoria.

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<sup>1</sup>Chinese medicine consists of acupuncture, Chinese herbal medicine, and herbal dispensing

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

With this in mind, the FCMA 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 from a University or equivalent.
- two Board members.

The FCMA 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 2008<sup>2</sup>. 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.<sup>3</sup>

The FCMA believes that the two Board members on the accreditation committee would be indispensable in facilitating the seamless communication between the Committee and the Board, thereby contributing to the quality assurance of the work of the committee.

Based on the experience the FCMA gained 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.

<sup>2</sup> COAG 2008 <http://www.ahpra.gov.au/Legislation-and-Publications/Ministerial-Directives-and-Communiqués.aspx> accessed on 27 December 2011

<sup>3</sup> See clause 1.39 of the above

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The FCMA suggests, however, that the committee seeks input and expert evidence from at 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, the FCMA 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.

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

Yours sincerely,



Dr. Tony San Sun, PhD

President

Society Chinese Medicine and Acupuncture QLD Inc.