

09 January 2012

Ms Debra Gillick  
Executive Officer  
Chinese Medicine Board of Australia  
AHPRA, GPO Box 9958, Melbourne, 3001

**Re: Consultation by the Chinese Medicine Board of Australia “Accreditation Committee Membership”**

Dear Ms Gillick

I would like to thank the Chinese Medicine Board of Australia for the opportunity to make this submission to address the “Accreditation Committee Membership” for the regulation of Chinese medicine professions.

1. *Do you agree with the proposed inclusion of at least one educationalist, at least one Chinese medicine academic, at least one Chinese medicine practitioner and at least one biomedical sciences academic?*

The Accreditation Committee needs the expertise to assess submissions for course accreditation with regard to their content, delivery, relevance and management. Consequently, one or more academics experienced in the design and delivery of accredited programs in Chinese medicine are essential. In order to provide a view on the relevance of the course content and clinical training to clinical practice in Australia, an experienced practitioner of Chinese medicine is an important inclusion. It should be noted that members could have expertise as both an academic and practitioner. The inclusion of one experienced educationalist should be sufficient so it is not necessary to include ‘at least one’. An academic with expertise in biomedical sciences is necessary but one should be sufficient, not ‘at least one’. Since this person may also have expertise in Chinese medicine, it is not necessary to specify that there be a separate person for this role.

It is important to include the range of expertise needed whilst keeping the committee sufficiently streamlined for efficient operation. Therefore, the membership requirements should allow for members to have roles in more than one field.

Our suggested rewording is as follows:

*The committee must include: one educationalist, at least one Chinese medicine academic, at least one Chinese medicine practitioner and at least one member with expertise in the delivery of the biomedical sciences components included in the program.*

2. *Do you think there should be additional sub-criteria for the selection of the above persons and if so what they should be?*

The Chinese medicine academic must have had experience in delivering a program that was accredited by the Chinese Medicine Board of Australia or the Chinese Medicine Registration Board of Victoria.

The Chinese medicine practitioner must be registered in the divisions for which the program is seeking accreditation, i.e. if the program is in acupuncture, then the practitioner must be a registered acupuncturist, and for programs in Chinese herbal medicine the practitioner must be registered in this division. In the case of herbal dispensing, it is sufficient that the practitioner be registered as a Chinese herbalist but the practitioner also requires expertise in herbal dispensing.

The person with biomedical sciences expertise must have expertise relevant to the subjects included in this component in a Chinese medicine course.

*3. Do you think a Board member should be on the Accreditation Committee?*

No. The Committee must be independent of the Board. This does not mean that a Board member cannot be a designated liaison person, but they must not be present when the Committee is making decisions.

*4. Do you think a community representative should be on the Accreditation Committee?*

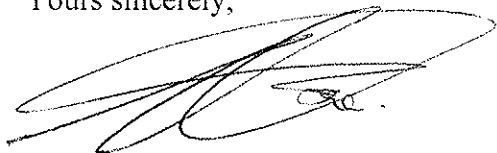
No. Community representatives typically have input into the course development committees set up by the provider.

*7. How many members do you think the Committee should have?*

In general the Committee should not be greater than five members provided they have the combined expertise required. The work load involved in accreditation will vary according the scope of the course and whether it is an initial proposal or a routine reaccreditation so the Board needs flexibility in deciding upon a suitable committee.

I wish you all the very best for the implementation of the accreditation standards.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Tony Zhang', written over a horizontal line.

Dr Tony Zhang, PhD  
Head, Discipline of Chinese Medicine  
School of Health Sciences  
RMIT University