



5<sup>th</sup> September 2013

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

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

Dear Sir/Madam,

College of TCM  
Department of  
Medical and Molecular Bioscience  
Faculty of Science  
City Campus  
Building 4, Level 4, Room 50  
PO Box 123 Broadway  
NSW 2007 Australia  
T: +61 2 9514 2500  
F: +61 2 9514 7866  
[www.science.uts.edu.au/health/](http://www.science.uts.edu.au/health/)  
UTS CRICOS PROVIDER CODE 00099F

**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), BHltSc(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**