

Response template for the public consultation on the proposed change to the protected title for the podiatry speciality of podiatric surgery

September 2024

This response template is the preferred way to submit your feedback to the public consultation on the Podiatry Board of Australia's proposed change to the protected title for the podiatry specialty of podiatric surgery.

Please provide any feedback in this document, including your responses to the questions in the text boxes on the following pages. The boxes will expand to accommodate your response. You do not need to respond to a question if you have no comment.

Making a submission

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Consultation closes on 8 November 2024.

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Are you completing this submission on behalf of an organisation or as an individual?

Your answer:

☐ Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

☒ Myself

Name: [Click or tap here to enter text.](#) Aziz Afaar

Contact email: [Click or tap here to enter text.](#) [REDACTED]

Question B

If you are completing this submission as an individual, are you:

☒ A registered health practitioner?

Profession: [Click or tap here to enter text.](#) Podiatrist: Registration number
POD0002114327

☐ A member of the public?

☐ Other: [Click or tap here to enter text.](#)

Question C

Would you like your submission to be published?

☒ Yes, publish my submission **with** my name/organisation name

☐ Yes, publish my submission **without** my name/ organisation name

☐ No – **do not** publish my submission

Your responses to the consultation questions

1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?

No, I do not agree with the proposal to change the title from Podiatric surgeon to "surgical podiatrist." The current title, podiatric surgeon, accurately reflects the level of specialised training, skill, and scope of practice required. Podiatric surgeon aligns with titles of other surgical specialists including dentistry and appropriately represents the depth of surgical expertise involved, which serves to clarify rather than confuse the public. Changing this title could unintentionally undermine the profession by implying a lower level of surgical capability, which may discourage patients from seeking essential podiatric surgery services and thus limit access to specialised care.

2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?

An alternative suggestion to support clarity while preserving the professional standing of podiatric surgeons is to keep the title as podiatric surgeon but to enhance public education about the qualifications and scope of practice of podiatric surgeons. For instance, public information campaigns or clearer definitions of roles within medical centers and on registration boards' websites could improve understanding. Educating patients on the surgical training of podiatric surgeons would bridge knowledge gaps more effectively than altering the title, which risks creating ambiguity about podiatric surgeons' specialised role in foot and ankle surgery whilst also reducing trust.

3. What are the potential impacts for consumers of the proposed change in title?

For consumers, a title change could introduce confusion and mistrust about the qualifications of podiatric surgeons. Patients seeking specialised care may incorrectly perceive "surgical podiatrist" as a lesser designation compared to "podiatric surgeon," leading them to question their provider's expertise and potentially seek alternative or unnecessary referrals to other surgical disciplines. This misperception may reduce access to timely, affordable podiatric surgical care, especially for complex foot and ankle conditions that podiatric surgeons are highly trained to manage. Additionally, limiting consumer access to specialised podiatric care in the public health sphere due to misunderstandings of the role could reduce healthcare access and increase costs overall.

4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?

For podiatric surgeons, this title change could have significant financial, professional, and operational repercussions. Redefining the title could impact Medicare access, insurance reimbursements, and restrict privileges within the public health system, thereby further affecting podiatric surgeons' ability to provide affordable care. Moreover, a diminished title may lead to a perceived lack of credibility among other healthcare professionals, potentially limiting referral networks and collaborative opportunities. These factors combined could result in reduced patient volumes and increased out-of-pocket costs for patients who would otherwise benefit ultimately increasing the financial strain on both podiatric surgeons and patients.

5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?

The proposed title change could hinder the refinement and efficiency of the public healthcare system by creating barriers to specialist services that are crucial for the public, especially in underserved areas. Currently, podiatric surgeons provide expert care for complex foot and ankle issues, often at a lower cost to the public system compared to other surgical specialties. By downgrading their title to "surgical podiatrist," the Board risks diminishing the perceived value of podiatric surgeons, potentially excluding them from Medicare funding and hospital privileges. This exclusion would reduce access to affordable, specialised surgical care, ultimately leading to higher healthcare costs as patients may turn to orthopaedic surgeons for procedures within a podiatric surgeon's scope. Such redirection could strain already limited orthopaedic resources, causing delays in treatment, longer wait times, and increased healthcare expenditures, contradicting the goal of an efficient, streamlined public healthcare system.

Moreover, the title change lacks empirical evidence to justify its implementation and appears to be driven by bias rather than objective assessment. No substantial data indicates that the term "podiatric surgeon" has led to widespread confusion among patients. Instead, the proposal seems to be a weaponised attempt by competing associations to undermine the role and credibility of podiatric surgeons. Without evidence supporting the necessity of this title change, it appears to be an effort to diminish the standing of podiatric surgeons rather than improve healthcare clarity. Such a biased approach disregards the value podiatric surgeons add and are likely to add in the public healthcare system of the future, compromising the system's inclusivity, accessibility, and cost-effectiveness.

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Your answer: <input type="checkbox"/> Organisation Name of organisation: Click or tap here to enter text. Contact email: Click or tap here to enter text. <input checked="" type="checkbox"/> Myself Name: Lidia Ambrosino Contact email: [REDACTED]
Question B If you are completing this submission as an individual, are you: <input checked="" type="checkbox"/> A registered health practitioner? Profession: Podiatrist <input type="checkbox"/> A member of the public? <input type="checkbox"/> Other: Click or tap here to enter text.
Question C Would you like your submission to be published? <input checked="" type="checkbox"/> Yes, publish my submission with my name/organisation name <input type="checkbox"/> Yes, publish my submission without my name/ organisation name <input type="checkbox"/> No – do not publish my submission

Your responses to the consultation questions

1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?
<p>I do not agree. There is no evidence to show the current title has caused public harm or confusion.</p> <p>Better education to the public on the role of podiatric surgeons is what will fix this, not a title change. The current title clearly outlines the practitioners true scope of practice.</p>
2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?
<p>No, as I strongly do not agree this current title should change</p>
3. What are the potential impacts for consumers of the proposed change in title?
<p>It will potentially weaken the profession. This could impact patient access for vital podiatric surgeries.</p> <p>This may limit rebates from health insurers causing private patients to go without important procedures.</p> <p>There may be even more confusion by patients as "surgical podiatrist" could just be mistaken for a general podiatrist who can perform a nail surgery, rather than an actual PODIATRIC SURGEON performing more significant musculoskeletal surgeries.</p>
4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?
<p>This will undermine the entire podiatric surgeon profession.</p> <p>It will risk the financial standing of podiatric surgeons.</p> <p>It will negatively impact career progression of general podiatrists</p>
5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?
<p>These practicing podiatric surgeons have undergone thorough training and additional education, as would any other orthopaedic surgeon. They have had this title since 2010. They are surgeons of the foot and ankle. And I would hate for their position to be undermined to patients when these practicing surgeons are the ones who have had the biggest positive impact on podiatric patients outcomes.</p>

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Your answer:

☐ Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

☒ Myself

Name: [Click or tap here to enter text.](#) Ozan Amir

Contact email: [Click or tap here to enter text.](#) [REDACTED]

Question B

If you are completing this submission as an individual, are you:

☒ A registered health practitioner?

Profession: [Click or tap here to enter text.](#) Podiatric Surgeon

☐ A member of the public?

☐ Other: [Click or tap here to enter text.](#)

Question C

Would you like your submission to be published?

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Your responses to the consultation questions

1. Do you agree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to 'surgical podiatrist' to make it clear that the practitioner is a specialist podiatrist who performs surgery? Why or why not?

No. Podiatric surgeon clearly states the practitioner is a podiatrist and performs surgery. Post graduate courses in Australia are titled 'Doctor of Podiatric Medicine'. I assume AHPRA finds this title not confusing to the public - the word podiatric is mentioned (not podiatrist) in these post grad courses. 'Doctor' and 'Medicine' are also in the title and these graduates are neither medical students nor medical doctors.

2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?

No.

This title issue has nothing to do with providing clarity to the public and is an AMA and AOA campaign, as it has been in the United States and United Kingdom. Doctor Patterson also made mention of this in his report.

3. What are the potential impacts for consumers of the proposed change in title?

I believe if a proper survey was conducted by AHPRA, consumers would not care a less about the title change. AHPRA should have surveyed the tens of thousands of consumers that have seen a Podiatric surgeon and asked the if they were confused.

4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?

Being subordinate to the orthopaedic establishment. We are trying to improve our standing within the medical community, and degrading our title will not help Podiatric surgeons in this regard.

5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?

Degradation of the podiatry profession. The board should be mindful that Podiatric surgeons are also Podiatrists. Do we want our profession to be strong or be violated by the AMA and AOA?

As mentioned earlier, if the board recommends the title change, then it should also change the title of any podiatry course that uses the terms 'Doctor of Podiatric Medicine'.

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Contact email: [Click or tap here to enter text.](#)

☒ Myself

Name: Omar Baarini

Contact email: [REDACTED]

Question B

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Profession: Podiatric Surgeon

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Absolutely not – Podiatric surgeons are highly trained podiatric specialists who undertake complex surgery making them surgeons, not surgical podiatrists which is arguably more confusing as most podiatrists undertake surgical procedures, hence having them potentially identify as 'surgical podiatrists'. This is not dissimilar to those that identify as a 'paediatric podiatrist' or 'sports podiatrist' as they undertake some additional training – far from the 4-6 years of rigorous specialist training that Podiatric Surgeons undertake.

2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?

No – as you will see in the survey undertaken by a highly reputable company (instinct and reason) which regularly undertakes surveys for the government including the department of health; there are reasonable solutions in the form of education material as outlined in the study attached. Professor Patterson clearly articulated the following:

'there needs to be a strong justification for restricting the use of title 'surgeon'. The rationale for restricting the use of the term should be to reduce consumer confusion and potential harm, on the basis that this cannot be achieved by less directive means'.

Those means are clearly available and do work as seen in the results.

3. What are the potential impacts for consumers of the proposed change in title?

Confusion – significant confusion.

4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?

A number of patients that I have asked about the potential title change to 'surgical podiatrists' have indicated they would not have come to see me if this was my title – they felt it would mean that I am not highly trained to perform bone and joint surgery, but rather ingrown nails and some more simple soft tissue procedures only. This would have significant financial implications.

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5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?
Social impacts, work force issues as trainees are already dropping out and we are seeing less interest from podiatrists wanting to pursue this career , further medical dominance at a time that the government is trying to increase scope of practice of allied health practitioners.

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Your answer:

☐ Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email:

☒ Myself

Name: Lauren Bayly

Contact email: [REDACTED]

Question B

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<ul style="list-style-type: none"> • No. The title podiatric surgeon is protected for a reason, and that is because it is the best descriptor of what podiatric surgeons are and what they do. • The term podiatric surgeon is an international term used in the United States and the United Kingdom. • Anaesthetists (specialist medical practitioners) have worked for decades with podiatric surgeons and have never expressed concern over the title, podiatric surgeon. This is because they are witnessing surgery, by specialist podiatric practitioners. • If confusion exists, then it is best addressed by a public information campaign and by the practitioner providing appropriate information to the patient. • Podiatric surgeon is appropriate, as an AHPRA approved course in podiatric surgery is completed before the title can be used. • The term podiatric, is indicative of podiatry, whilst 'surgical' is a demotion from being a true surgeon. • A title change, of the type suggested, is akin to a psychologist being called a counsellor, or a police officer, being called a security guard, when their respective training and occupational responsibilities are far more comprehensive. • No country in the world has what are termed surgical podiatrists.
<p>2. Do you have an alternative suggestion for the protected title? If yes, how would your suggested title achieve the same result as 'surgical podiatrist' in providing greater clarity to consumers?</p>
<ul style="list-style-type: none"> • International consistency in terminology is the one component of removing confusion, followed by consumer and stakeholder education. • Orthopaedic Surgeon is a term used throughout the world. There are no Surgical Orthopaedists. • A change of title is not likely to improve safety, which should be the focus. The Independent Review reported that podiatric surgeons are safe. <p>Alternative descriptors could be:</p> <p>Podiatric Surgeon (Podiatrist Practicing Podiatric Surgery)</p> <p>Podiatric Surgeon (Specialist Podiatrist)</p> <p>Doctor of Podiatric Medicine (DPM) (Foot and Ankle Surgeon)*</p> <p>The alternatives suggested would be accompanied by a consumer and stakeholder information campaign to supplement understanding and remove confusion.</p> <p>*This is an appropriate title as Doctors of Podiatric Medicine (DPM) training programs are running, with more being established in Australia. American podiatrists are called Doctors of Podiatric Medicine (DPM's).</p>

3. What are the potential impacts for consumers of the proposed change in title?

- Consumers may be confused that surgical podiatrists are not sufficiently trained in foot and ankle surgery to the level they require and desire.
- The consumer will be at a disadvantage because a surgical podiatrist will never receive parity in funding, via Medicare and private health insurance companies, for their surgery. Their out-of-pocket expenses for surgery will therefore be higher.
- The consumer will be disadvantaged because specialist podiatrists will not have parity with medical specialists, such as orthopaedic surgeons, which prevents equality in interprofessional relationships, which is better for patient outcomes.
- Consumers will be at a disadvantage because a surgical podiatrist will not be able to advocate for them, on the same level as an orthopaedic surgeon, even should the orthopaedic surgeon have no specific training in the foot, ankle and lower limb.
- A surgical podiatrist will have less status in foot and ankle surgery compared to all other surgical specialist fields, even though these other fields/practitioners may perform little foot and ankle surgery. This means the consumer may undertake surgery with another surgeon, who does not have the same level of experience in foot and ankle surgery, as the surgical podiatrist.
- Less diversity in health care provision, is not in the best interests of consumers, who are entitled to choice in health care provision.

4. What are the potential impacts, including potential costs, for podiatric surgeons of the proposed change in title?

- The impact of title change will be devastating to the field of podiatric surgery, as it will stymie full integration of this specialist field into the Australian health care model.
- It will stimulate an increase AHPRA notifications from orthopaedic surgeons against podiatric surgeons, because a surgical podiatrist will be perceived to be inferior to an orthopaedic surgeon, even an orthopaedic surgeon who has limited training in the foot and ankle.
- Medical dominance will stymie the progression of an entire profession field, that of podiatry/podiatric medicine in Australia, which is in contrast to the United Kingdom and the United States.
- Absence of an appropriate title will ensure podiatric surgeons continue to receive inadequate professional recognition, funding for services rendered and ongoing vulnerability to unfair litigation and scrutiny.

5. Are there any unintended consequences the Board might not have considered in relation to the proposed change of title?

- Title change from podiatric surgeon to surgical podiatrist will remove a level of parity for the profession of podiatry, with medicine, whilst most individual medical doctors see the profession as collaborative and not subordinate.

- Title change creates more confusion for the consumer as it provides them with insecurity as to the level of training the practitioner has received, especially as there is no preface for the title anywhere in the word.
- Collaboration between orthopaedic surgeons and podiatric surgeons does happen around the world, based on the principles of mutual respect and on what is in the best interests of consumers/patients. This is the correct direction to take on this matter (change in title will likely impede this).
- There will be an unfair orthopaedic competitive advantage over podiatric surgeons – this is likely have significant financial implications, for podiatric surgeons.
- Title change demanded by the AOA is part of their plan to maintain a competitive advantage over podiatric surgery.
- The Australian Podiatry Board, which is independent from the Australian Medical Board, has its primary objective to ensure podiatric practitioners engage the public safely. Podiatric surgeons are safe and effective.
- Any confusion over title can be addressed by an appropriate media and information campaign. This is the less reactive and the best approach.