

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

Please complete this response template and email to podiatryconsultation@ahpra.gov.au.

Consultation closes on 8 November 2024.

Publication of submissions

The Board publishes submissions at its discretion. The Board generally publishes submissions on its website to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we will remove personally identifying information from submissions, including contact details.

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Initial questions

To help us better understand your situation and the context of your feedback please provide us with some details about you. These details will not be published in any summary of the collated feedback from this consultation.

Question A

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:

Contact email:

Question B

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

☒ A registered health practitioner?

Profession: Medical doctor

☐ 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?

Yes I think this title is more clear as the title surgeon is confusion for the general public who don't understand that in some situation surgery can be performed by non medical practitioners (ie dental and podiatrist)

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

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

Improved clarity of role of podiatrist and delineation between a podiatrist and orthopaedic surgeon who both perform procedures on feet.

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

I cant comment on costs for the podiatrists.

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

No

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☒ Myself

[Redacted]

[Redacted]

Question B

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

☒ A registered health practitioner?

Profession: Podiatric Surgeon

☐ A member of the public?

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

Question C

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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?

Strongly disagree,

Having the word surgeon in the title is essential. Our patients are undergoing surgery by a qualified surgeon.

Downplaying the title, downplays the seriousness of medical procedures being performed which could have serious consequences.

It would be a huge step back for the Podiatry profession and this sentiment is felt by majority of podiatrists and podiatric surgeons. A title that was fought for by the hard work of many before us in this profession to be protected for such reasons.

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?

Greater clarity needs to come from consumer education rather than change of title which achieves little.

I would much rather suggest podiatric surgeons include an information sheet as part of their consent process providing such education and informing patients, so they understand the background of their surgeons training and the differences between podiatric surgery and orthopaedic surgery.

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

The consumer is likely no more informed by changing the title.

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

There is an enormous damage to the profession which has been trying to advocate and been the brand of podiatric surgeons over the past 30 years to where it is now.

There is also an enormous individual cost in having to rebrand all print, media, and digital websites.

There is also serious consequences to associations such as the ACPS who have been working with lobbyists and insurers to progress the profession having to re-brand.

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

AHPRA caving to the demands of the AMA and particularly the AOA fuels anti-competitive behaviours.

The fact their influence is advocating our on profession to remove a protected title is ludicrous when the entire profession does not share this sentiment.

I would highly doubt the AOA stops at a name change being achieved.

This is a backwards step and is likely the first of many into abolishing the profession.

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☒ Myself

☐

☐

Question B

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

☒ A registered health practitioner ☐

Profession ☐ Podiatrist

☐ A member of the public ☐

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

Question C

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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?

I disagree, I think the term surgeon accurately reflects the work and training done by podiatric surgeons. Changing the title would blur the distinction between podiatric surgeons and general podiatrists, confusing patients about their level of expertise and potentially leading them to make uninformed decisions about their care.

Additionally, the title "podiatric surgeon" is well-established and respected in both Australia and internationally. A sudden change would disrupt this long-standing designation, requiring significant educational efforts to explain the difference and confusing patients and health care providers alike.

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 I don't think any title changes will reflect a persons perception of what training a person has. I think It would be more appropriate to mandate a podiatric surgeon use a disclaimer when completing informed consent paperwork that states that the person providing the procedures has appropriate training from accredited training program to perform the procedure but does not hold a medical degree. This statement would better serve the public to ensure they have been adequately informed. Likewise, I think it would be appropriate for orthopaedics to state their training. If they have completed an accredited foot and ankle-specific fellowship or training program over and above their general orthopaedic training they should inform the consumer that they do not have any specific training over and above their general orthopaedic training which includes some foot and ankle training.

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

Realistically, I don't think a title change will positively impact consumers and quite possibly could negatively influence consumers of surgery. For example, patients may perceive procedures performed by "surgical podiatrists" as minor or less significant than those performed by "surgeons." As a result, patients may be more dismissive of the potential risks and complications, placing patients at greater risk of harm

Additionally, with an aging population and an increasing need for foot and ankle surgery, the demand for specialists in this area is expected to rise. Podiatric surgeons play a crucial role in meeting this demand. Diminishing the professional appearance of podiatric surgeons by changing their title could lead to longer waiting times for surgery, worsening outcomes for patients. This delay may result in more complications and poorer long-term results, compromising public safety.

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

- A change in title could reduce referrals from other healthcare professionals, such as GPs, and podiatrists, who may perceive “surgical podiatrists” as being less qualified to perform complex surgeries.
- Podiatric surgeons have built a strong professional identity around their specialised role. Changing the title erodes the recognition they have worked hard to achieve and creates unnecessary confusion about their scope of practice
- This title change seems to be driven by competing professions, such as orthopedic surgeons, who may benefit from diminishing the credibility of podiatric surgeons. This undermines fair competition, and limits patient choice, as more cases would be funnelled to medical doctors even when podiatric surgeons are highly specialised and well-qualified to handle foot and ankle surgeries.

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

Potential consequences could adversely impact patient safety.

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[Redacted]

Question B

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☒ A registered health practitioner?

Profession: Podiatrist

☐ A member of the public?

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

Question C

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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?

I strongly disagree with the proposal to change the protected title for the podiatry specialty of podiatric surgery to "surgical podiatrist" for several reasons.

Firstly, the title "podiatric surgeon" accurately reflects the advanced training and specialized qualifications required to perform surgery within the podiatry field. Podiatric surgeons undergo extensive education, clinical training, and surgical residencies to achieve this designation, differentiating them from general podiatrists. By changing the title to "surgical podiatrist," there is a risk of diluting the perceived expertise of these highly trained specialists. The proposed title could confuse patients, who might not appreciate the distinction between a podiatrist with general qualifications and one who has undergone additional years of specialized training in surgery.

Secondly, the use of the word "surgeon" holds weight and the title 'Podiatric Surgeon' is universally recognized as implying a high level of expertise in the surgical field. Changing the title to "surgical podiatrist" diminishes this recognition and may reduce trust in the qualifications of Podiatric Surgeons. In a healthcare environment where patient safety is paramount, clarity and confidence in practitioners' qualifications are essential. The existing title of "podiatric surgeon" clearly communicates this expertise.

Lastly, such a change may undermine the profession's standing within the broader medical and healthcare community. Other surgical specialists, such as dental surgeons, do not have titles that are prefixed with their primary specialty (e.g., "surgical dentists"). Retaining the title "podiatric surgeon" maintains parity with these fields and reinforces the legitimacy and rigor of podiatric surgery as a distinct surgical specialty.

For these reasons, I believe that the title "podiatric surgeon" should be preserved, as it accurately reflects both the scope of practice and the level of specialist training involved.

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 for the protected title could be **"podiatric surgical specialist."**

This title offers several advantages in providing clarity to consumers while preserving the integrity of the profession. The term "podiatric surgical specialist" emphasizes both the podiatry background and the specialist nature of the role, making it clear that this practitioner has advanced expertise in surgical procedures. The addition of "specialist" immediately conveys that this is not a general podiatrist but one with advanced qualifications and training in surgery. Unlike "surgical podiatrist," which could dilute the recognition of surgical expertise, "podiatric surgical specialist" aligns more closely with other surgical designations in healthcare (e.g., dental surgical specialist). This title preserves the status of podiatric surgeons within the wider medical and healthcare community, reinforcing their standing as highly trained professionals. The word "specialist" provides consumers with a clear understanding that the practitioner holds a higher level of qualification and expertise in surgery compared to a general podiatrist. It avoids confusion by distinguishing between those who are qualified to perform surgeries and those who are not, without needing to resort to vague terms.

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

Dilution of Expertise: The title "surgical podiatrist" might blur the distinction between a general podiatrist and a specialist with advanced surgical training. Consumers may struggle to understand that a "surgical podiatrist" holds significant additional qualifications compared to a standard podiatrist. This confusion could lead patients to assume that all podiatrists, even those without surgical training, are qualified to perform surgery.

Undermining Consumer Trust and misleading assumptions: The title change may inadvertently undermine trust in the practitioner's expertise. The term "podiatric surgeon" is widely understood to reflect someone with specific surgical qualifications. Altering it to "surgical podiatrist" might make consumers question the level of competency and training required, potentially causing hesitation in seeking surgical care from podiatric specialists. The title "surgical podiatrist" could lead consumers to believe that any podiatrist can offer surgery as part of routine practice. This may increase the risk of patients opting for lower-tier care, thinking all podiatrists perform surgeries, when they should be seeking out the specific skills of a fully qualified podiatric surgeon.

Increased Risk of Seeking Care from Non-Specialists: Without a clear and recognizable distinction in the title, consumers may unintentionally seek surgical services from general podiatrists who are not properly qualified to perform such procedures. This can lead to complications or suboptimal outcomes if the consumer fails to identify a true specialist.

Delayed or Inappropriate Referrals: Confusion over the qualifications of "surgical podiatrists" could affect referrals from general practitioners and other health professionals. They may not realize that the change in title still denotes a highly specialized practitioner. As a result, patients might be delayed in accessing the appropriate surgical care or referred to non-specialist practitioners for procedures beyond their scope.

Potential for Overuse of Title: If the distinction between general and surgical podiatrists becomes unclear, there's a risk that non-surgical podiatrists may inappropriately market themselves as qualified for surgical interventions. This could mislead consumers and drive up demand for services that general podiatrists are not fully equipped to provide.

Unnecessary Costs: Misleading titles could lead patients to undergo consultations with non-specialists who are not equipped to handle their surgical needs, resulting in wasted time and increased healthcare costs. Consumers might find themselves going through multiple referrals or consultations before finding the correct specialist.

Insurance and Coverage Confusion: The ambiguity in the title might also cause confusion for insurance providers and patients when determining coverage for specific procedures, as insurers may question the level of expertise required for particular surgeries.

Diminished Public Perception of Specialisation: The shift from "podiatric surgeon" to "surgical podiatrist" could reduce public perception of podiatric surgery as a specialized and highly skilled profession. Consumers might view the new title as less prestigious or authoritative, potentially influencing their decision to seek care from other specialists, such as orthopaedic surgeons, even when podiatric surgeons are the most appropriate providers.

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

Reduced Recognition: The title "podiatric surgeon" carries a level of prestige and professional recognition that aligns with other surgical specialties. By changing the title to "surgical podiatrist," podiatric surgeons may experience a reduction in the perceived value of their qualifications and expertise, as the new title could be seen as less specialized or authoritative.

Reduced Status Among Peers: Podiatric surgeons work alongside orthopaedic surgeons and other medical specialists. The title change may cause confusion or reduce their professional standing in interdisciplinary teams, leading to a perception that podiatric surgery is less rigorous or distinguished compared to other surgical fields.

Rebranding Expenses: Podiatric surgeons would need to update marketing materials, websites, business cards, and clinic signage to reflect the new title. These changes could incur significant costs, particularly for private practices that rely on marketing to attract patients. The need to educate the public about the new title would also require investment in advertising campaigns and public relations efforts to ensure consumers understand the qualifications behind "surgical podiatrist."

Patient Education and Communication Costs: Practices may have to spend time and resources explaining the new title to existing patients, referral sources, and insurance providers. This could involve training staff to handle patient queries, creating educational brochures or online content, and conducting outreach to referrers to clarify that podiatric surgeons are still fully qualified despite the title change.

Confusion Leading to Fewer Referrals: The new title may confuse general practitioners (GPs), other healthcare professionals, and patients, leading to fewer referrals for podiatric surgery. GPs and specialists who are unsure about the qualifications of "surgical podiatrists" might prefer to refer patients to orthopaedic surgeons or other specialists with more widely recognized titles, reducing the number of surgical cases for podiatric surgeons.

Potential Drop in Patient Confidence: If the new title is perceived as less authoritative, patients may be more hesitant to seek out podiatric surgeons for procedures. This could lead to a decline in patient volume, particularly for elective or non-emergency surgeries, which are a major source of revenue for podiatric surgeons in private practice.

Limitation of Career Growth: The title change could negatively impact the career progression of podiatric surgeons, particularly those seeking leadership roles, academic positions, or opportunities within hospitals and surgical centers. Institutes may favour retaining professionals with titles that are more universally recognized (such as "podiatric surgeon") for positions of leadership or advanced surgical roles.

Impact on Academic and Research Opportunities: Podiatric surgeons involved in teaching, research, or publishing may find it more difficult to secure academic positions or grants if the title "surgical podiatrist" is seen as less prestigious. The academic community and funding bodies might favour professionals with more established titles, impacting career advancement and research opportunities.

Regulatory and Licensing Complications: The title change may require podiatric surgeons to update their professional registrations and licenses with regulatory bodies, which could involve administrative costs and time. Additionally, if the title is not clearly defined in the regulatory framework, it could lead to confusion about scope of practice, potentially opening the door to challenges or disputes regarding their qualifications.

Risk of Legal Challenges: Some podiatric surgeons may face legal challenges or have to defend their scope of practice if patients or other medical professionals question the qualifications associated with the new title. This could lead to increased legal costs and the need for clearer regulatory guidelines.

Complications with Insurance Providers: The title change could create confusion among insurance providers, leading to potential delays or denials of reimbursement for surgical procedures. Insurance companies may not immediately recognize the title "surgical podiatrist" as equivalent to "podiatric surgeon," which could result in claims being challenged or additional documentation being required. This would increase administrative costs and potentially delay payments.

Lower Reimbursement Rates: If insurance providers or government healthcare programs perceive the new title as reflecting a less specialized role, they may reduce reimbursement rates for surgical procedures performed by "surgical podiatrists." This could result in lower income for podiatric surgeons, particularly in private practice, where revenue relies heavily on procedure-based billing.

Encroachment by Non-Specialist Podiatrists: The title "surgical podiatrist" could lead to confusion between general podiatrists and those who are highly trained in surgery. This may encourage non-specialist podiatrists to market themselves as being qualified to perform surgical procedures, increasing competition for podiatric surgeons. This blurring of the lines between generalists and

specialists could make it harder for true podiatric surgeons to differentiate themselves, potentially eroding their patient base.

Lower Barriers to Entry: If the title change results in a perception that podiatric surgery requires fewer qualifications, it may lower the barrier to entry for other practitioners, potentially opening up the field to less qualified individuals who wish to perform surgical procedures, thereby increasing competition.

Erosion of Professional Identity: Podiatric surgeons have worked hard to establish themselves as experts in a distinct, highly specialized field. Changing the title to "surgical podiatrist" could erode the strong professional identity they have cultivated, making it harder to advocate for their profession, secure legislative protections, and attract new talent to the field.

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

Loss of Trust in Expertise: The proposed title "surgical podiatrist" may not convey the same level of expertise and training as "podiatric surgeon," which could erode public trust in the profession. Patients tend to associate the word "surgeon" with highly specialized and rigorous training. Changing the title might inadvertently suggest that the practitioner has less surgical expertise, leading patients to seek care elsewhere, such as from orthopaedic surgeons. By not clearly distinguishing between a general podiatrist and a specialist who performs surgery, the public might misunderstand what procedures a "surgical podiatrist" can perform. This confusion could lead to inappropriate healthcare decisions, such as seeking surgical care from less qualified practitioners or delaying necessary treatments. General practitioners, and other healthcare providers who frequently refer patients to podiatric surgeons might be confused by the title change. Without the word "surgeon" in the title, they might mistakenly perceive a "surgical podiatrist" as less qualified for complex cases, leading to fewer referrals and potentially impacting patient outcomes if appropriate specialist care is delayed. Changing their title could also inadvertently reduce their standing within the medical hierarchy, making it harder for them to advocate for their patients in hospital settings or multidisciplinary meetings.

Increased Risk of Legal Disputes: If the new title leads to confusion about qualifications, there could be legal challenges from patients or other medical professionals questioning whether a "surgical podiatrist" is qualified to perform certain surgeries. This might lead to legal battles over scope of practice, which could be costly for individual practitioners and the regulatory bodies overseeing podiatry.

Complications with Credentialing and Licensing: Hospitals and insurance companies often base credentialing and reimbursement decisions on specific titles that reflect professional qualifications. The proposed title change could complicate this process, requiring additional clarification about qualifications and scope of practice. This could lead to delays in licensing and reimbursement, and might open the door for non-specialist podiatrists to claim qualifications they do not possess.

Decreased Interest in Specialization: Prospective students who are considering specializing in podiatric surgery might be discouraged by the less prestigious title. The title "podiatric surgeon" carries weight, and changing it to "surgical podiatrist" could make the specialization seem less attractive, leading to a decrease in applicants to podiatric surgery programs. This could ultimately reduce the number of qualified specialists entering the field, impacting the future workforce.

Reduced Marketability: For podiatric surgeons in private practice, the title "surgical podiatrist" may be perceived as less prestigious by potential patients. This could reduce their ability to attract new patients, particularly for elective or higher-paying procedures. As a result, private practices could experience a drop in revenue.

Increased Costs for Rebranding and Communication: As mentioned earlier, podiatric surgeons would need to invest in rebranding efforts to update their title across all marketing and business materials. Additionally, there could be costs associated with educating the public about the meaning of the new title, which could strain smaller practices with limited resources.

Non-Specialist Podiatrists Using the Title: The less specific title "surgical podiatrist" could make it easier for non-specialist podiatrists to misrepresent themselves as qualified to perform surgery. This blurring of boundaries could lead to a rise in non-specialist podiatrists marketing themselves as surgical experts, potentially performing surgeries outside their scope of competence. This poses a significant risk to patient safety and the profession's reputation.

Challenges in Enforcement: Regulatory bodies might face difficulties enforcing proper use of the title. Differentiating between a general podiatrist and a true surgical specialist could become more complex, requiring more oversight and creating regulatory burdens. This could strain the resources of the Board and licensing authorities.

Increased Competition with Orthopaedic Surgeons: If the title "surgical podiatrist" is seen as less specialized than "podiatric surgeon," orthopaedic surgeons might capitalize on this shift to market themselves more aggressively as the go-to specialists for foot and ankle surgeries. This could lead to increased competition and fewer surgical cases being referred to podiatric surgeons.

Loss of Established Professional Identity: The field of podiatric surgery has worked hard to establish its distinct identity and credibility within the broader medical community. Changing the title may undermine decades of progress in gaining recognition as surgical specialists. This could set the profession back in terms of advocacy efforts, such as pushing for expanded scopes of practice or increased funding for podiatric surgery programs.

Global Recognition Issues: In countries where the title "podiatric surgeon" is used and respected, the change to "surgical podiatrist" might create confusion for practitioners looking to work abroad or collaborate internationally. The title "podiatric surgeon" is more universally understood to reflect a high level of surgical training, while "surgical podiatrist" may not be as well recognized or respected in international contexts.

Challenges for International Patients: Medical tourism is growing, with patients seeking care across borders. The title "podiatric surgeon" offers clear and recognizable meaning to international patients. Changing to "surgical podiatrist" might confuse patients seeking specialized surgical care in countries where the title "podiatric surgeon" is still in use, potentially impacting patient volumes from international sources.

Perception as a "Lower-Tier" Surgery: By shifting from "podiatric surgeon" to "surgical podiatrist," there is a risk of the profession being viewed as a lower-tier surgical specialty. This could have long-term consequences on funding, research opportunities, and support from government and healthcare organizations, which may prioritize other surgical fields seen as more established.

Confusion in Regulatory Frameworks: Changing the title might create a need to update various laws, regulations, and policies that currently refer to "podiatric surgeons." This could lead to significant administrative burdens on regulatory bodies, educational institutions, and licensing authorities, all of which would have to adjust their frameworks to accommodate the new title. This transition could be costly and time-consuming.

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☒ Myself

[Redacted]

[Redacted]

Question B

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☒ A registered health practitioner?

Profession: Orthopaedic Surgeon

☐ A member of the public?

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

Question C

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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?**

Yes, as patients are currently confused regarding the term 'podiatric surgeon'. They see these practitioners and they assume them to be medical doctors who have undergone medical and surgical training which is not the case.

- 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?**

Potential alternative title could be 'procedural podiatrist'.

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

They will be better informed about the background knowledge and medical/procedural training of the surgical practitioner.

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

May take clinician time to change advertising and marketing documents to new title.

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

Not that I can think of.