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ORTHOPAEDIC
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23 March 2017

David Salisbury
General Manager
Consumer & Small Business Strategies Branch
Australian Competition & Consumer Commission
GPO Box 520
Melbourne Vic 3001

By email: phireport@acc.gov.au

Dear Mr Salisbury,

ACCC Report to the Senate on Private Health Insurance

Thank you for the opportunity to provide feedback on the ACCC Report to the Senate on Private Health Insurance. Taking note of the 2015 Report AOA would like to bring to the Commission's notice that orthopaedic surgeons and operating podiatrists are not equal and therefore should not be treated as equals. In fact, within the past 12 months the Department of Health Medical Service Advisory Committee (MSAC) did not approve the use of the orthopaedic foot and ankle Medical Benefits Schedule item numbers to be extended to podiatry use.

The basis for all orthopaedic surgeon training is a medical degree, with further education and significant clinical training in orthopaedics including foot and ankle surgery. The majority of orthopaedic foot and ankle surgeons have gone on to undertake additional, specific foot and ankle surgery fellowships. As you would be aware all medical training in Australia is independently assessed by the Australian Medical Council (AMC). Operating Podiatrists remain the only group of health professionals who operate on the Australian public that do not have their education and training assessed independently.

AOA notes that there are a number of statements within the April 2016 podiatrist's response to ACCC which are inaccurate and/or warrant further comment. Podiatric surgical training is not equivalent to orthopaedic surgical training for the reasons outlined in the paragraphs above.

AOA believes there should be a uniformity of minimum standards across education and standards of training for all Australian health professionals practicing within surgical disciplines and a single organisation should be responsible for accreditation and training (which is the fundamental premise and stated intent of the National Registration legislation).

AOA would also like to highlight that the National Legislation referred to in the Australasian College of Podiatric Surgeons (ACPS) response to the Commission dated April 2016, and the National Registration Act, does not recognise Podiatric Surgery as a specialisation. This was created by the



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Australian Podiatry Board AFTER the National Registration legislation had passed, and was in contravention of the legislation by not taking into account the opinions of all stakeholders.

AOA would welcome the opportunity to discuss any aspects of this submission with the Commission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ian Incoll'.

Ian Incoll
Dean of Education
President