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Ms. Deborah Frew Executive Consultant Miller Blue Group

Via email: <u>Deborah.frew@millerbluegroup.com.au</u>

Dear Ms. Frew

AHPRA Rapid Review of the use of the title 'Oral Surgeon'

Australian Orthopaedic Association (AOA) AOA is the peak professional body for orthopaedic surgeons in Australia. AOA provides high quality specialist education, training and continuing professional development. AOA is committed to ensuring the highest possible standard of orthopaedic care and is the leading authority in the provision of orthopaedic information to the community

The Health Ministers of Australia (HMM) have identified potential patient and consumer confusion with the use of the title 'Oral Surgeon' by dental practitioners. The HMM has instructed AHPRA to undertake a review of the title in order to provide advice back to the HMM. AHPRA is currently conducting a rapid review with a limited scope of consultation. AOA write to strongly support the Health Ministers in this endeavor and request that the title 'Oral Surgeon' no longer be permitted for use by specialist dentists, as they lack medical and surgical training.

It is essential to address widespread confusion among patients, clinicians, and administrators who often do not distinguish between the dental specialist title **Oral Surgeon** and the medical/surgical specialist title **Oral and Maxillofacial Surgeon**. These two distinct groups of practitioners encompass vastly different qualifications, training, and scopes of practice.

Whilst Oral Surgeons have a dental qualification and a university-based postgraduate qualification (by coursework), they lack medical qualifications or any significant in-hospital surgical training. In contrast, Oral and Maxillofacial Surgeons have both medical and dental degrees, a 1-year rotation in general surgery and a 4-year (in hospital) surgical training fellowship, accredited by the Australian Medical Council (AMC).

This issue has come into focus due to recent reforms to the Health Practitioner Regulation National Law to strengthen regulation of cosmetic surgery and title for 'surgical podiatrists' currently also under consultation. In 2023 the National Law was amended to protect the use of the title 'surgeon' and restrict its use within the medical profession. This reform unfortunately resulted in two remaining anomalies within the healthcare setting - podiatrists and specialist dentists continue to be allowed to use the title 'surgeon' even though they are not medically or surgically trained ('Podiatric Surgeon', 'Oral Surgeon'). The reality of these changes is that it is now broadly assumed by the community that the title 'surgeon' has been protected to suitably qualified medical surgical practitioners, as promised by the reforms. It therefore leaves room for further confusion amongst administrators, clinicians and patients if there are health practitioners who are still able to use the title without the requisite medical surgical training.



In March 2024 an independent review of the regulation of podiatric surgeons recommended changing the use of the title 'podiatric surgeon' to 'surgical podiatrist'. AOA has provided a submission not supporting this title rather proposing 'podiatric proceduralists' as a more accurate title. If the recommendation proposed by AHPRA to 'surgical podiatrist' is accepted by Health Ministers (as it has been by AHPRA), it will leave specialist dentists using the title 'Oral Surgeon' as the only non-medically/surgically trained health practitioners permitted to use the title 'surgeon'. This will be the only remaining anomaly, and we believe this practice should cease.

On this basis, AOA support changing the dental specialist title 'Oral Surgeon' to a title that does **not** create patient confusion through the natural assumption of medical or surgical qualifications. This can only be solved by the changing of the name so that the title of Oral Surgeons unambiguously describes their origins and scope of practice in dentistry.

In the interest of consistency and efficiency in the health system, AOA also ask that AHPRA undertake one concurrent process in order to give effect to both these changes.

Thank you for your consideration.

Kind regards,

Scott Fletcher President