

Health Practitioner Regulation National Law (Surgeons) Amendment Bill 2023

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The Australasian College of Dermatologists

Submission to Health and Environment Committee Inquiry: Health Practitioner Regulation National Law (Surgeons) Amendment Bill 2023

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ABOUT THE ACD

The Australasian College of Dermatologists (ACD) is the sole medical college accredited by the Australian Medical Council for the training and continuing professional development of medical practitioners in the specialty of dermatology. As the national peak membership organisation, we represent over 600 dermatologist Fellows (FACD) and 100 trainees.

We are the leading authority in Australia for dermatology, providing information, advocacy and advice to patients, communities, government and other stakeholders on skin health and dermatological practice. Our vision is for the highest standard of skin health and dermatology care to be accessible to all patients and communities.

COMMENTS AND RECOMMENDATIONS

The Health Practitioner Regulation National Law (Surgeons) Amendment Bill 2023, introduced into the Queensland on 20 April 2023 and referred to the Health and Environment Committee for examination and report, is the final stage in the consultation process around establishing protected title of 'Surgeon' under the National Law.

ACD has at each stage in the consultation, put forward that Fellows of any AMC-accredited specialist medical college whose training includes a substantial surgical training component and who are performing the surgery they are trained and qualified to perform, which includes dermatologists, should be able to continue to use the title 'surgeon' within their scope of practice and expertise.

Like ophthalmology and obstetrics and gynaecology, dermatology is a combined medical and surgical speciality that is recognised by the Medical Board of Australia (MBA) and accredited by the AMC. Surgical techniques are an essential part of specialist dermatology practice, and the development of skin surgery skills and expertise comprises a significant proportion of ACD's AMC-accredited dermatology training program, which is logged, assessed and examined.

In Australia, skin cancer is one of the most diagnosed cancers in Australia,^{*} with 16,878 new cases of melanoma estimated in 2021.[†] Skin surgery is one of the vital specialty services provided in the multidisciplinary cancer control continuum.[‡]

Fellows of the Australasian College of Dermatologists (FACD) have successfully completed 4 years of medical and surgical specialist training in accredited settings, and those who decide to focus their practice on surgical aspects may be referred to as a 'dermatologic surgeon'. The majority of the surgical procedures performed are therapeutic, including those related to the treatment of skin cancer and melanoma. These procedures include removal and reconstruction or repair of cancer in both anatomically simple and complex locations.

ACD remains concerned that the proposed amendment (restricting the title 'surgeon' to those holding specialist registration in surgery, obstetrics and gynaecology, and ophthalmology) fails to appropriately recognise dermatologists training and role in delivering surgical procedures.

^{*} Cancer Council Australia, Skin Cancer, <http://www.cancer.org.au/about-cancer/types-ofcancer/skin-cancer.html>, viewed November 2014.

[†] AIHW Cancer Data in Australia 2021 web report and supplementary data tables

[‡] The Australasian College of Dermatologists (ACD). Position statement: Skin cancer in Australia. ACD 2021, St Leonards NSW. <https://www.dermcoll.edu.au/wp-content/uploads/2021/12/ACD-Position-Statement-Skin-cancer-in-Australia-December-2021.pdf> Accessed March 2022.

Mohs surgery

We are particularly concerned about the decision of Health Ministers in relation to use of the title by those dermatologists who have undertaken advanced training to perform Mohs surgery.

To meet the high demand for skin cancer management, 70 dermatologists in Australia have further specialised and focused their scope of practice to Mohs micrographic surgery - an advanced technique that ensures complete removal of skin cancers with minimal loss of surrounding tissue. Mohs surgery involves the removal of skin cancers in small slices until all cancerous tissue is removed, examine each section by pathology and repair the excision. This technique is recommended in anatomically complex locations, such as the head and neck,⁵ and is the gold standard for ensuring the highest cure rate for non-melanoma skin cancers.

In Australia, Mohs microsurgery is only undertaken by specialist dermatologists who have undertaken a further ACD-accredited 12-month post-Fellowship training to become Mohs subspecialists.

The term 'Mohs surgeon' is internationally recognised and appropriately describes the clinical sciences that underpin the practices of Mohs surgery, including anatomy, physiology, immunology, cutaneous oncology, histopathology and wound healing. The training involves the development of competency in all elements of Mohs surgery, including histopathological interpretation and reconstruction of surgical defects, and the identification and management of patients appropriate for this procedure, including those who need a multidisciplinary management approach with other specialists."

The ACD maintains a subspeciality register of dermatologists who practice Mohs surgery. To remain on this list, they are required to complete ongoing medical education and quality assurance program activities.

Mohs surgery is a surgical procedure, and as of November 2018, changes to dermatology items listed on the Medical Benefits Schedule (MBS) included the restriction of Mohs items to ACD-recognised Mohs dermatologists. ACD has been granted oversight of the Mohs Register of accredited providers for the purposes of Department of Human Services MBS claims approval (#31000, #31001, #31002, #31002, #31004, #31005).

It is also worth noting that the vast majority of Australian dermatologists who practice Mohs surgery also hold Fellowship of the American College of Mohs Surgeons (FACMS). Of note, in the US, Mohs surgeons are recognised and acknowledged as high-skilled surgeons in their own right.

Given the above, ACD is of the view that it is both appropriate and justifiable for 'Mohs surgeons' to be allowed to use the protected title surgeon as part of their role.

Mohs microsurgeons are not GPs with a special interest or cosmetic practitioners - they are specialist dermatologists whose substantive work is the detection and excision of skin cancers using advanced surgical techniques. By continuing to be able to use the term Mohs 'surgeon' in

⁵ The Australasian College of Dermatologists (ACD). Position statement: Skin cancer in Australia. ACD 2021, St Leonards NSW. <https://www.dermcoll.edu.au/wp-content/uploads/2021/12/ACD-Position-Statement-Skin-cancer-in-Australia-December-2021.pdf> Accessed March 2022.

^{**} The Australasian College of Dermatologists (ACD). Mohs Micrographic Surgery. <https://www.dermcoll.edu.au/for-fellows-and-trainees/continued-learning-cpd/mohs-surgery/> Accessed April 2022

their job description, this group will be able to continue to demonstrate to the wider public that they are highly trained medical professionals who do specialist surgery, and as such ACD asks that the decision to exclude them from the list of specialists able to call themselves surgeon be reconsidered.

ACD therefore recommends that as a minimum the new s115A, subsection 5 be amended to include those holding a specialist registration in the recognised specialty of dermatology or as a minimum those holding a specialist registration in the recognised specialty of dermatology and who are on the Mohs register of accredited providers.