



**American College of
Foot and Ankle Surgeons®**



**AMERICAN BOARD OF
FOOT AND ANKLE SURGERY®**

May 20, 2025

Executive Leadership Team
Optum
MN Office 102
11000 Optum Circle
Eden Prairie, MN 55344

Re: Misclassification of Doctors of Podiatric Medicine as Allied Health Professionals

Dear Optum Executive Leadership Team,

On behalf of the 9,400 physicians represented by the American Board of Foot and Ankle Surgeons (ABFAS) and the American College of Foot and Ankle Surgeons (ACFAS), we are deeply concerned about Optum's recent reclassification of board-certified Doctors of Podiatric Medicine (DPMs) as "Allied Health Professionals." This change not only misrepresents the training, licensure, and clinical scope of DPMs but also risks creating significant confusion and disruption within healthcare teams and patient care practices. Under Section 1861(r) of the Social Security Act, the term "physician," when used in connection with the performance of any function or action, explicitly includes "(3) a doctor of podiatric medicine," for the purposes of sections governing physician services under Medicare. CMS and other federal agencies uniformly recognize DPMs as physicians when practicing within the scope of state licensure.

Doctors of Podiatric Medicine complete four years of medical education followed by a three-year surgical residency program focused on foot and ankle pathology. Many pursue board certification through the American Board of Foot and Ankle Surgery (ABFAS)—a rigorous process demonstrating their qualifications to provide comprehensive medical and surgical care of the foot and ankle. The American College of Foot and Ankle Surgeons (ACFAS) provides additional resources and standards that reflect the education, credentialing, and surgical proficiency of its members.

To reclassify DPMs as "Allied Health Professionals" and equate them with non-physician providers such as physical therapists and chiropractors diminishes their professional standing, jeopardizes equitable access to benefits and leadership opportunities, and sets a troubling precedent with potential ripple effects across healthcare systems nationwide.

We respectfully urge Optum to:

1. Immediately reverse this reclassification and reinstate DPMs within your system as physicians;
2. Ensure that benefits, titles, and leadership opportunities are aligned with physician-level credentials and responsibilities; and
3. Engage in direct dialogue with ACFAS to establish a consistent and appropriate recognition of podiatric physicians across your network.

We believe that this misclassification not only undermines the professional standing of Doctors of Podiatric Medicine but also compromises the quality of patient care. DPMs are integral to the healthcare system, providing specialized expertise in the prevention, diagnosis, and treatment of foot and ankle conditions. By categorizing DPMs as “Allied Health Professionals,” Optum risks creating confusion in the healthcare landscape, potentially leading to discrepancies in the delivery of care and misaligning team-based medical practice, where DPMs work collaboratively with other healthcare providers as physicians. Such a decision could set a harmful precedent, affecting access to care and patient outcomes on a larger scale.

We understand Optum’s commitment to ensuring efficiency and effective care within its network, and we believe that aligning the classification of DPMs with their professional training and expertise will further strengthen these efforts. We are available to meet with your team and provide supporting documentation, including our policy position statements, credentialing guidelines, and training standards.

Thank you for your attention to this critical issue. We look forward to your prompt response and the opportunity to work together on a resolution that reflects the depth of training and value that podiatric physicians contribute to the healthcare system. To coordinate a meeting with ACFAS leadership, please contact the College’s CEO, PJ Andrus, at pj.andrus@acfas.org.

Sincerely,



Alan Ng, DPM, FACFAS
ACFAS President
On behalf of the Board of Directors of the
American College of Foot and Ankle Surgeons



Michelle Butterworth, DPM, FACFAS
ABFAS President
On behalf of the Board of Directors of the
American Board of Foot and Ankle Surgery

P.S. For your reference, please find below links to relevant ACFAS position statements that further outline the education, training, and credentialing standards for foot and ankle surgeons:

- [ACFAS Position Statement on The Education, Training & Certification of ACFAS Foot & Ankle Surgeons](#)
- [Credentialing of Foot and Ankle Surgeons and Guidelines for Surgical Delineation of Privileges](#)