



Position Statement: History and Physical Privileges for Foot and Ankle Surgeons

Approved by the ACFAS Board of Directors, July 2016

The American College of Foot and Ankle Surgeons (ACFAS) concurs with the Centers for Medicare and Medicaid Services (CMS) and The Joint Commission (TJC) regarding granting privileges for the performance of comprehensive history and physicals (H&Ps), including admission H&Ps, and notes that this process should be uniformly applied to all surgeons, regardless of medical degree. Foot and ankle surgeons (DPMs) are specialists within podiatric medicine, who are skilled in performing an admission medical history and physical examination leading to the diagnosis, medical and surgical management and treatment of all diseases, deformities, injuries and defects of the foot, ankle and related structures of the leg as governed by the appropriate state statute(s).

TJC standards specify that the decision to grant, deny or renew privileges is an objective, evidenced-based process. Additionally, TJC specifies that evidence of current licensure, current competence, relevant training and ability to perform the privileges requested should form the basis of privilege delineation. The available clinical privileges at an institution should reflect the current state scope of practice and the process should be based on a fair objective analysis, following the same requirements used to evaluate other physician (MD/DO) specialists with the same due process standards.

In 2001, The Joint Commission clarified in its hospital accreditation manuals that qualified DPMs are permitted to be credentialed to conduct comprehensive H&Ps, including admission H&Ps. TJC clarified in 2002 and in keeping with the delivery of safe, effective and high-quality healthcare that DPMs could independently conduct their own admission H&P exams, not only in the hospital, but also in hospital-owned ambulatory clinics and related out-patient facilities.

CMS revised its hospital Conditions of Participation (CoPs) to include DPMs as one of the healthcare professionals permitted to perform H&Ps. The new CoPs provide that “a medical history and physical examination be completed no more than 30 days before or 24 hours after admission for each patient by a physician¹, an oral and maxillofacial surgeon, or other qualified individual in accordance with State law and hospital policy. The medical history and physical examination must be placed in the patient’s medical record within 24 hours after admission.”². Section 1861(r) of the Social Security Act defines physician to include a doctor of podiatric medicine.³

¹ As defined in §1861(r) of the Social Security Act

² 42 C.F.R. 482.22(c)(5)

³ 42 USC §1395x(r)(2008)

POSITION STATEMENT



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ACFAS supports individual credentialing and surgical privilege delineation to be determined by individual qualifications, documentation, and training consistent with other medical (MD/DO) specialties. This ACFAS position is consistent with the standards of the Joint Commission and the Medicare Conditions of Participation.