



History and Physical Privileges for Foot and Ankle Surgeons

Approved by the Board of Directors February 2019

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. Section 1861(r) of the Social Security Act defines “physician” to include a doctor of podiatric medicine. 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.

TJC clarified in its hospital accreditation manuals (updated in 2015) that qualified DPMs are permitted to be credentialed to conduct comprehensive H&Ps, including admission H&Ps. TJC (2015) also states that in keeping with the delivery of safe, effective and high-quality healthcare, DPMs can independently conduct their own admission H&P exams. This applies to hospitals, 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.

ACFAS supports credentialing and privileging pursuant to the ACFAS position statement on “Credentialing of Podiatric Foot and Ankle Surgeons.” This ACFAS position is consistent with the standards of The Joint Commission and the Medicare Conditions of Participation.

The American College of Foot and Ankle Surgeons is a professional society of 7,600 foot and ankle surgeons. Founded in 1942, the College’s mission is to promote research and provide continuing education for the foot and ankle surgical specialty, and to educate the general public on foot health and conditions of the foot and ankle through its patient education website, FootHealthFacts.org.

¹ CMS Hospital Conditions of Participation, July 16, 2012, 42 CFR 482 contains the health and safety requirements that hospitals must meet to participate in the Medicare and Medicaid programs. Social Security Act Title XVIII, §1861 Definitions of Services, Institutions, etc.