Position Statement: History & Physical Privileges for Podiatric Foot and Ankle Surgeons
March 2009

It is the position of the American College of Foot and Ankle Surgeons (College) that any process for the granting of privileges for the performance of history and physicals (H&Ps) be uniformly applied to all surgeons, regardless of medical degree. Foot and Ankle Surgeons are specialists within podiatric medicine (Doctors of Podiatric Medicine) that are skilled in performing an admission medical history and physical examination leading to the diagnosis, medical and surgical management of all diseases, deformities, injuries and defects of the foot, ankle and related structures of the leg as governed by appropriate state statute(s).

The Joint Commission standards specify that the decision to grant, deny or renew privileges is an objective, evidenced-based process. Additionally, the Joint Commission further specifies that evidence of current licensure, current competence, relevant training and ability to perform the privileges requested form the basis of privilege delineation. The available clinical privileges at a hospital should represent the scope of practice as defined by state law. This process should be based on a fair objective analysis and follow the same requirements used to evaluate other physician specialists with the same due process standards.

In 2001, the Joint Commission issued an important clarification statement to its Accreditation Manual for Hospitals. The clarification officially stated that permitting qualified and credentialed DPMs to conduct medical H&Ps independently is, in fact, consistent with the intent of the Joint Commission’s Standards, and in keeping with the delivery of safe, high-quality healthcare. In 2002, an additional clarification was issued stating 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.

In addition, the Centers for Medicare and Medicaid Services (CMS) revised its hospital Conditions of Participation (CoPs) to include Doctors of Podiatric Medicine in the professionals permitted to perform H&Ps (effective January 26, 2007). The new CoPs now 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 physician (as defined in §1861(r) of the Social Security Act), 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.” [42 C.F.R. 482.22(c)(5)]. Section 1861(r) of the Social Security Act defines physician to include a doctor of podiatric medicine. [42 USC §1395x(r)(2008)].

The College’s position supports individual credentialing and surgical privilege delineation to be determined by individual qualification and documentation consistent with other specialties. This position is consistent with the standards of the Joint Commission and the Medicare Conditions of Participation.