



American College of
Foot and Ankle Surgeons

DATE: April 18, 2002

TO: All ACFAS Members

FROM: Robert G. Frykberg, DPM, FACFAS, President

RE: Additional JCAHO Clarification on DPM History & Physical Examinations

As you may recall from a the notice we sent you in early January 2001, following a series of discussions that the ACFAS leadership had with the staff of the Joint Commission on Accreditation of Healthcare Organizations (JCAHO), the Joint Commission did agree to issue a Standards Clarification regarding the ability of Doctors of Podiatric Medicine being able to independently perform their own history and physical examinations on their patients who are admitted for in patient care. That Clarification was published by the JCAHO on December 22, 2000, and it continues to be posted in the Practice Management section of the "Members' Only" area of the College's web site.

Upon receipt of that mailing from us, many of you contacted ACFAS to tell us that you were experiencing similar difficulties with being able to do your own H&Ps in ambulatory care and other out-patient settings. The College continued to maintain an open and positive dialogue with the JCAHO following the issuance of the initial Clarification, and I am pleased to be able to inform you that we have reached an agreement with the Joint Commission to enhance the existing Clarification so that it is clear that it covers all services surveyed under the JCAHO's hospital accreditation standards.

The JCAHO has issued this additional Clarification effective as of April 5, 2002. This notice is posted on their web site. A copy is enclosed for your review and use, and it is also on the College's web site in the "Members' Only" section. This is intended to clarify that it is consistent with JCAHO's accreditation standards for Doctors of Podiatric Medicine to 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. The requirement to have the appropriate privilege to perform this procedure is, of course, still in effect.

Further, upon discussing the ability of Doctors of Podiatric Medicine to perform such exams in an out-patient/ambulatory care facility that is accredited under the JCAHO Ambulatory Program, ACFAS was advised that the language contained in Section PE.1.8.1 of their Ambulatory Care manual was absolutely clear in permitting DPMs to also perform their own H&Ps in these settings with medical staff approval, and therefore, requires no further clarification. According to this Section, a Doctor of Podiatric Medicine who meet the definition of a Licensed Independent Practitioner (LIP), is also permitted to perform his/her own complete and independent H&P exam on a patient in an ambulatory care setting that is accredited by the JCAHO under their Ambulatory Program.

We trust you will find this additional Clarification regarding DPM out-patient H&P exams, coupled with the JCAHO's viewpoint on non-surveyed ambulatory care settings, to be helpful in your practices. These regulations and explanations should further remove any restrictions or impediments you may have been experiencing. We view this as another significant step forward for our profession and our membership. I am extremely proud that the American College of Foot and Ankle Surgeons was instrumental in having these issues clarified. We sincerely thank the Joint Commission for their assistance and cooperation in this matter.

RGF/jj
encl.