

ARIZONA STATE BOARD OF PODIATRY EXAMINERS
SUBSTANTIVE POLICY STATEMENT REGARDING BOARD POLICIES
AND PROCEDURES NOTIFYING ALL LICENSEES THAT THE BOARD IS ADOPTING THE
FOLLOWING GUIDELINE AS A MODEL POLICY FOR THE
INTERPRETATION OF THE TERM “FEE SPLITTING.”

SPS 13-01

This Substantive Policy Statement is advisory only. A Substantive Policy Statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules made in accordance with the Arizona administrative procedure act. If you believe that this Substantive Policy Statement does impose additional requirements or penalties on regulated parties you may petition the agency under Arizona Revised Statutes §41-1033 for a review of the document.

A.R.S. §32-854.01(7) provides that “fee splitting under any guise whatsoever” is considered an act of unprofessional conduct. The Arizona Board of Podiatry Examiners hereby adopts the following guideline with regard to the interpretation of the term “fee splitting:”

“Fee splitting” includes, but is not limited to, soliciting patients or potential patients through internet-based marketing systems which utilize vouchers or coupons to secure medical services, or any other paid referral system for the same, where the podiatrist and a third party each keep or receive part of the fee paid by the patient or potential patient for each voucher or coupon.