

**ARIZONA STATE BOARD OF PODIATRY EXAMINERS**  
**SUBSTANTIVE POLICY STATEMENT REGARDING BOARD POLICIES**  
**AND PROCEDURES NOTIFYING ALL LICENSEES THAT THE BOARD IS ADOPTING THE**  
**FOLLOWING GUIDELINES AS A MODEL POLICY FOR THE ORDERING OF**  
**HYPERBARIC OXYGEN THERAPY AND SUPERVISION OF THE ADMINISTRATION**  
**OF HYPERBARIC OXYGEN THERAPY**

**SPS 12-02**

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.

The Centers for Medicare and Medicaid Services, (“CMS”) has developed guidelines which indicate that a physician who is supervising the administration of hyperbaric oxygen therapy, (“HBOT”), must be able to treat any complications which arise during the administration of the treatment. Those guidelines further state that a supervising physician must include the ability to insert chest tubes, treat seizures, and evaluate and treat sudden eardrum rupture. The Board agrees that these guidelines are necessary to protect public health, safety and welfare.

A.R.S. §32-801(9) defines “podiatrist” as follows: Podiatrist is synonymous with podiatric physician and surgeon and means a person who, within the limitations of this chapter, is registered and licensed to practice podiatry by means of diagnosis or medical, surgical, mechanical, manipulative or electrical treatment of ailments of the human foot and leg, but does not include amputation of the leg or entire foot or administration of an anesthetic other than local.

A.R.S. §32-801(10) defines “podiatry” as follows: Podiatry is synonymous with chiropody and means the diagnosis or medical, surgical, mechanical, manipulative or electrical treatment of ailments of the human foot and leg, but does not include amputation of the leg or entire foot or administration of an anesthetic other than local.

Based on the CMS guidelines and the scope of practice for podiatrist in Arizona as defined in Statute, the Arizona Board of Podiatry Examiners provides the following policy: the ordering of HBOT

is within the scope of practice for a podiatrist; however, it is not within the scope of practice to supervise the administration of HBOT because the training and skills required to treat potential complications of the treatment are outside the scope of practice for podiatrists in Arizona.

(Adopted at the Arizona Board of Podiatry Examiners meeting on December 12, 2012.)

(Arizona Board of Podiatry Examiners amended definitions (9) and (10) to reflect statute change on December 12, 2019).

**NOTICE OF AGENCY SUBSTANTIVE POLICY STATEMENT  
STATE OF ARIZONA BOARD OF PODIATRY EXAMINERS**

**1. Subject of the substantive policy statement and the substantive policy statement number by which the policy statement is referred:**

Notification to existing active licensees and applicants applying for a podiatry license that as part of the policy governing the practice of podiatry the Board has adopted guidelines regarding the ordering of hyperbaric oxygen therapy, (“HBOT”) and the supervision of the administration of HBOT. This Board policy is number SPS 12 – 02.

**2. Date the substantive policy statement was issued and the effective date of the policy statement is different from the issuance date:**

The substantive policy statement was adopted by the Board on December 12, 2012 and was an effective on that date. Arizona Board of Podiatry Examiners amended definitions (9) and (10) to reflect statute change on December 12, 2019

**3. Summary of the contents of the substantive policy statement:**

The statement provides notice to new license applicants and existing licensees of the guidelines adopted by the Board with regard to the ordering of HBOT and the supervision of the administration of HBOT.

**4. A statement as to whether the substantive policy statement is a new statement or a revision:**

This is a new statement.

**5. The name, address, and telephone number of the person to whom questions and comments about the substantive policy statement may be directed:**

Name: Kristina Gomez, Executive Director

Address: 1740 W. Adams St., Suite 3004, Phoenix, AZ 85007.

Telephone: (602) 542-8151

**6. Information about where a person may obtain a copy of the substantive policy statement and the cost of obtaining a copy of the statement:**

A request may be directed to the address or phone number above. The cost for obtaining a copy of the statement is \$.25 per page.