



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

July 15, 2015

Elaine M. Papp, RN MSN COHN-S CM
U.S. Department Of Transportation
Federal Motor Carrier Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

RE: Family physicians and application forms regarding the Federal Diabetes Exemption Program

Dear Ms. Papp:

On behalf of the American Academy of Family Physicians (AAFP), which represents 120,900 family physicians and medical students across the country, I strongly urge you to address what we hope is an oversight in the Federal Motor Carrier Safety Administration's online [guidance](#) to applicants for the Federal Diabetes Exemption Program. The document does not allow board-certified family physicians to examine applicants and complete the evaluation checklist they need for the program. Instead, it states, "The applicant must be examined by a physician who is a board-certified or board-eligible endocrinologist." We urge you to change the guidance and application to make it clear that applicants may be examined by their family physician rather than an endocrinologist if they wish. We request that you change the guidance.

Family physicians are dedicated and trained to treating the whole person and are more than capable of managing and treating patients with diabetes. The AAFP believes that family physicians are able to complete the forms needed by commercial motor vehicle drivers with diabetes who are applying for this program. Aside from patients and their families, there is no group more involved in managing patients with chronic disease like diabetes than family physicians. According to the Robert Graham Center's analysis of the Medical Expenditure Panel Survey (2008-2010), approximately 34 percent of ambulatory care visits to physicians of patients with a diabetes diagnosis were to family physicians or general practitioners. An additional 10 percent of visits were to other primary care physicians, including general internists and geriatricians, and only 56 percent of visits were to a subspecialist. One out of every four physician office visits in America takes place in a family physician's office and not all applicants will have access to an endocrinologist. Managing patients with diabetes goes to the very heart of family medicine.

Thank you for your time and consideration of this request. For any questions you might have please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org. We look forward to your response and rapid action on this important matter.

Sincerely,

Reid B. Blackwelder, MD, FAFBP
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