

December 7, 2015

Larry W. Minor, Associate Administrator for Policy
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE.
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

RE: Primary care physicians and the Federal Diabetes Exemption Program

Dear Associate Administrator Minor:

On behalf of the undersigned primary care physician organizations, we strongly urge you to address a significant problem in the Federal Motor Carrier Safety Administration's (FMCSA) policy regarding online guidance to applicants for the Federal Diabetes Exemption Program. The document does not allow board certified primary care 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 board certified primary care physician rather than require an endocrinologist. Though endocrinologists are capable of performing these exams, more diabetic patients are cared for and have access to board certified primary care physicians that are more than capable of managing and treating patients with diabetes. Thus primary care physicians should be allowed to complete these forms needed by commercial motor vehicle drivers with diabetes who are applying for this program.

Further, we also urge the FMCSA to review the overall physical qualifications standards as they relate to insulin treatment for diabetes, as the current rule does not reflect the improvements that have been made over the past decade in treating this condition. While the risk of hypoglycemia resulting from the use of insulin is a valid and reasonable concern, so too is the risk of hyperglycemia for individuals with untreated diabetes. Advancements in insulin treatment have greatly reduced the risk of hypoglycemia sometimes seen in the past with conventional insulin treatment. However, even with the Diabetes Exemption Program, the existing restriction on commercial motor vehicle drivers using insulin to treat diabetes is overly burdensome for those who are taking appropriate steps to manage their condition. While it may make sense to continue to

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prohibit the use of insulin in certain commercial motor vehicle drivers, for example, for those transporting hazardous substances or for other scenarios as appropriate, a blanket prohibition does not reflect the most current medical knowledge or practice. Reevaluating these standards to acknowledge the advancements that have been made in insulin treatment will not only help the FMCSA carry out its mission of ensuring public safety, but will help ensure the overall health and well-being of our patients who operate commercial motor vehicles.

Thank you for your time and consideration of this request. For any questions you might have please contact Robert Bennett at 202-232-9033 or rbennett@aafp.org.

We look forward to your response and rapid action on this important matter.

Sincerely,

American Academy of Family Physicians
American College of Osteopathic Family Physicians
American College of Osteopathic Internists
American College of Physicians
American Osteopathic Association

CC:

Charles A. Horan, III, Director, Carrier, Driver and Vehicle Safety Standards