



October 19, 2016

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

Dear Associate Administrator Minor:

On behalf of the American Academy of Family Physicians (AAFP), which represents 124,900 family physicians and medical students across the country, I write in response to the [request for comments](#) on the Medical Review Board Task Report on Insulin Treated Diabetes Mellitus and Commercial Motor Vehicle Drivers as published by the Federal Motor Carrier Safety Administration (FMCSA) in the September 9, 2016, *Federal Register*.

In this regulation, the FMCSA requests feedback on their Medical Review Board's report that recommends allowing drivers with stable, well-controlled insulin-treated diabetes mellitus to be qualified to operate commercial motor vehicles in interstate commerce by treating clinicians that are a doctor of medicine, a doctor of osteopathy, a nurse practitioner, or a physician's assistant who prescribed insulin to the driver and is knowledgeable regarding the treatment of diabetes. Current FMCSA policy requires such drivers to be examined by a physician who is a board-certified or board-eligible endocrinologist.

The AAFP sent the FMCSA a [letter](#) on July 15, 2015, and then an additional [letter](#) with other physician organizations on December 7, 2015, strongly urging the FMCSA to allow applicants to be examined by their primary care physician rather than require examination by an endocrinologist. Accordingly, the AAFP applauds the FMCSA, and we fully support the Medical Review Board's recommendation to allow primary care physicians to complete forms needed by commercial motor vehicle drivers with well-controlled insulin-treated diabetes mellitus. We support this policy change since primary care physicians are dedicated and trained in treating the whole person and are more than capable of managing and treating patients with diabetes.

Notwithstanding our enthusiastic support for allowing primary care physicians to perform these services, we are concerned that the FMCSA proposes to allow a nurse practitioner or a physician's assistant to perform these services without a physician's involvement. The AAFP supports physician-led, team-based care models since they have proven to be most effective in improving quality and efficiency. [Research](#) shows patients value and rely upon the additional education and training that physicians receive and they want a physician in the decision-making process. The AAFP believes

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that health professionals should work collaboratively in the best interest of patients within clinically integrated teams. Physician-led, team-based care addresses patients' needs for high quality, accessible health care and reflects the skills, training, and abilities of each health care team member.

We therefore urge the FMCSA to finalize policy that allows a doctor of medicine or osteopathy to perform these services for commercial drivers with diabetes.

We appreciate the opportunity to comment and make ourselves available for your questions. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in cursive script that reads "Wanda D. Filer, MD".

Wanda D. Filer, MD, MBA, FAAFP
Board Chair

CC: Christine A. Hydock