



December 21, 2016

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

RE: Docket Number FMCSA-2016-0333

On behalf of more than 108,500 PAs (physician assistants), the American Academy of PAs (AAPA) appreciates the opportunity to submit comments on the Federal Motor Carrier Safety Administration's (FMCSA's) proposed rule to amend FMCSA regulations to establish an alternative process for qualified physicians employed by the Department of Veterans Affairs to be listed on the Agency's National Registry of Certified Medical Examiners (National Registry).

AAPA views the proposal to develop an alternative process for VA physicians as duplicative and unnecessary. The current FMCSA process already permits VA physicians (and other eligible healthcare professionals employed by the VA, including PAs) to become certified medical examiners for the purpose of certifying the medical fitness of commercial motor vehicle drivers. Additionally, the current FMCSA regulations permit the VA to offer the required education for medical examiners. Finally, the existing FMCSA process is preferred because it permits medical examiners certified through the National Registry to perform medical evaluations for all commercial drivers, including commercial drivers who are military veterans. (The proposed rule restricts VA physicians who receive certification through the proposed alternative to evaluating only military veterans.) Nonetheless, if the FMCSA moves forward with the special certification process for physicians employed by the VA, AAPA believes the process should also apply to all healthcare professionals employed by the VA, including PAs, who are eligible to become certified medical examiners through the FMCSA's National Registry.

PAs have a long history as medical examiners with the FMSCA. As early as April 1990, the U.S Department of Transportation published a proposed rule to allow PAs to perform truck driver physicals. Over a period of many years, AAPA and the American Academy of PAs in Occupational Medicine worked closely with the FMCSA on the development of the National Registry, including the educational and testing requirements for healthcare professionals to become certified medical examiners.

The FMCSA's National Registry went into effect May 21, 2014, and as of December 12, 2016, 51,366 healthcare professionals across the nation are listed in the National Registry. Only 25 healthcare professionals employed by the VA are certified medical examiners, and less than half of the 25 are physicians. If the goal of the proposed rule is to encourage a greater number of healthcare professionals employed by the VA to become certified medical examiners, AAPA recommends the VA make a concerted effort to encourage all eligible healthcare professionals within the VA, including PAs, to become certified medical examiners through the existing program -- not to create a duplicative system applying only to VA physicians.

Again, thank you for the opportunity to submit comments to the proposed rule. Should you have any questions or comments, please do not hesitate to contact Tillie Fowler, Senior Vice President for Advocacy & Government Relations at 571-319-4551 or tfowler@aapa.org.

Sincerely,

A handwritten signature in cursive script that reads "Josanne K. Pagel".

Josanne K. Pagel, MPAS, PA-C, Karuna RMT, DFAAPA
President and Chair of the Board