



AMERICAN OSTEOPATHIC ASSOCIATION

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June 14, 2005

Chris A. Miller
Manager, Special Driver Programs
Pennsylvania Department of Transportation
Bureau of Driver Licensing
1101 South Front Street
Harrisburg, PA 17106

RE: Proposed Rule Amendments to §§ 71.2 and 71.3.

Dear Ms. Miller:

The American Osteopathic Association (AOA) is the national organization representing over 54,000 D.O.s in this country. As I am sure you are aware, there are two types of “complete” physicians eligible for medical licensure in the United States – D.O.s (osteopathic physicians) and M.D.s (allopathic physicians).

The AOA is aware that the Pennsylvania Department of Transportation has proposed amendments to §§ 71.2 and 71.3, or 67 PA Code Chapter 71. The AOA opposes the proposed rulemaking because it expands chiropractors’ scope of practice without adding sufficient safeguards to protect patients. Specifically, the rule amendment would allow chiropractors to administer the physical examinations required for school bus drivers under Pennsylvania law. In the past, only licensed physicians, certified nurse practitioners, or physician assistants have been allowed to perform these examinations. The AOA respectfully voices its strong opposition to this proposed rule.

Chiropractors are not trained medical or osteopathic physicians, nurse practitioners, or physician assistants. While the AOA believes that chiropractors provide a valuable service to patients, the education of a chiropractor is far less rigorous than, for example, the education of a D.O. Following a Bachelor’s level education, a D.O. must complete four years of osteopathic medical school followed by an internship and/or residency and successfully pass a national licensing examination sequence to become licensed. In contrast, a chiropractor, needing only an Associate level education in the vast majority of states, completes only four years of chiropractic school and successful passage of the chiropractic board for licensure. This limited experience and training may harm patients should a complication arise. One major educational concern is the lack of training chiropractors have in cardiology. The curriculum of a D.O. emphasizes preventative medicine and comprehensive patient care, including cardiology, whereas the curriculum for a chiropractor emphasizes physiological and biochemical aspects of the patient, exclusive of cardiology.

It is the AOA’s position that new roles for non-physician clinicians, including chiropractors, may be granted after appropriate processes and programs are established in all of the following four areas: education, training, examination, and regulation. Further, it is the AOA’s stance that non-physician clinicians may be allowed to expand their rights only after it is proven they have the ability to provide health care within these roles safely and effectively. The AOA is concerned

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that the best interests of the patients will be overlooked if the Chapter 71 rule amendment is made effective. The proposed amendment concerns the transportation of the most vulnerable passengers - school children - who may be unable to protect themselves or escape the vehicle in a situation where the driver becomes mentally or physically impaired.

Thank you in advance for your consideration of our comments regarding the proposed rule change. If you have any questions about osteopathic medicine or our position on this issue, please contact Linda Mascheri, AOA Director of State Government Affairs, at (800) 621-1773 x 8184.

Sincerely,



George Thomas, DO
President
American Osteopathic Association

C: Philip L. Shettle, DO, AOA President-Elect
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