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# Pennsylvania MEDICAL SOCIETY<sup>(1)</sup>

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REVIEW OF ADMISSION

June 17, 2005

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Ms. Rebecca L. Bickley, Director  
Bureau of Driver Licensing  
Department of Transportation  
1101 South Front Street  
Harrisburg, PA 17104

Re: *Pennsylvania Bulletin*; Department of Transportation Proposed Rulemaking -  
School Bus Driver Examination

Dear Ms. Bickley:

I am writing as President of the Pennsylvania Medical Society to offer comments on the above-captioned proposed rulemaking that would permit Doctors of Chiropractic Medicine to give physical examinations to school bus drivers. The Society questions the need for the proposed change that would add chiropractors to the list of health care practitioners approved to give such physicals.

While Federal regulations may permit the practice, it is limited to services the chiropractor is licensed to provide in their particular state. Some restrictions on chiropractic services have been lessened as the result of legislation in Pennsylvania. However, there is still a restriction as to what may be diagnosed and when the chiropractor should refer to another health care practitioner. Physicians are fully licensed unrestricted practitioners. Nurse Practitioners and Physician Assistants are practicing under a collaborative agreement with their physician and pursuant to the delegation of medical function of the Medical Practice Act. We would therefore suggest that the regulations either not be amended in the manner proposed by the Department or that some language be included stating that there may be some symptoms and conditions that are beyond the training and experience of a chiropractor to diagnose for the purpose of conducting a physical examination for a school bus driver. We believe this to be an appropriate disclaimer, especially since the examination is of a school bus driver who will be entrusted with the health and safety of school aged children.

I would also like to point out language from the existing regulation for possible change. The language is contained under Section 71.3 (a) and consists of the phrase "a school transportation physician." We believe that the phrase should be shortened to "a physician" that includes doctors of medicine and osteopathy.

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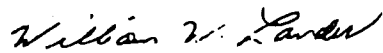
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On behalf of the Pennsylvania Medical Society, I appreciate the opportunity to comment on this proposed rulemaking.

Sincerely,



William L. Larder, MD  
President

Cc: Independent Regulatory Review Commission  
Chair, Senate Transportation Committee  
Chair, House Transportation Committee