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PENNSYLVANIA ACADEMY OF
FAMILY PHYSICIANS FOUNDATION

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June 27, 2005

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

Re: Proposed Rulemaking, Department of Transportation Regulation (#18-402,
(#2482).

Dear Ms. Bickley:

On behalf of the over 4,700 members of the Pennsylvania Academy of Family Physicians (PAFP) I write to express our concern with Department of Transportation proposed rulemaking that would permit chiropractors to perform physicals for school bus drivers by amending §§ 71.2 and 71.3 (relating to definitions; and physical examinations.)

In accordance with the Department of Transportation's regulations contained in § 71.3, we do not believe that a chiropractor in the Commonwealth is licensed to make many of the diagnoses required in the Department's regulations when performing a physical examination. Specifically, the following required diagnoses fall outside the scope of practice of a chiropractor including attesting whether the applicant:

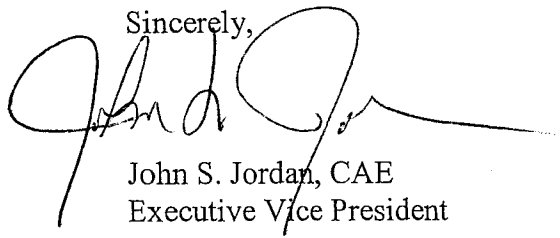
- Has an "established medical history or clinical diagnosis of diabetes mellitus currently requiring use of insulin or other hypoglycemic medication" §71.3(4);
- Has an "established medical history or clinical diagnosis of myocardial infarction, angina pectoris, coronary insufficiency or pacemaker insertion" §71.3(5);
- Has an "established medical history or clinical diagnosis of other cardiovascular disease resulting in syncope, dyspnea, loss or impairment of consciousness, collapse, or congestive cardiac failure" §71.3(6);
- Has a "current diagnosis of hypertension resulting in syncope, dyspnea, loss or impairment of consciousness, collapse, or congestive cardiac failure" §71.3(7);
- Has an "established medical history or clinical diagnosis of a respiratory dysfunction likely to impair the ability to drive a school bus safely" §71.3(8);
- Has an "established medical history or clinical diagnosis of seizure disorders or another condition likely to cause loss or impairment of consciousness or loss of ability to drive a school bus" §71.3(10);

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- Has a “mental, emotional or psychiatric disorder whether functional or organic which may be manifested in a condition likely to impair the ability to drive a school bus safely, such as inattentiveness, despondency, aggressiveness, or lack of concern for the safety of self or others” §71.3(11);
- Has hearing loss §71.3(12);
- Has been diagnosed to “abuse alcohol or another drug or substance known to impair skill or functions which may be manifested in a condition such as inattentiveness, despondency, aggressiveness or lack of concern for the safety of self or others” §71.3(13);
- Has “no type of tuberculosis in a transmittable stage and has taken the tuberculin test every 2 years as required by section 1418(b) of the Public School Code (24 P. S. § 14-1418(b))” §71.3(14).

I appreciate the opportunity to provide these comments on the proposed rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "John S. Jordan", with a long horizontal flourish extending to the right.

John S. Jordan, CAE
Executive Vice President

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