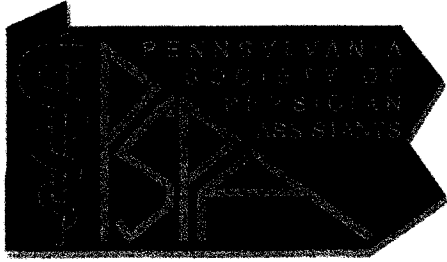


#2704



RECEIVED

2010 FEB 18 AM 10:50

INDEPENDENT REGULATORY  
REVIEW COMMISSION

February 16, 2010

John H. Jewett  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Subject: Penn DOT Final-Form Regulations:  
#18-411, School Bus Drivers  
#18-410, Physical and Mental Criteria, Including Vision Standards Relating to the Licensing of Drivers

Dear Mr. Jewett:

As chairman of the Governmental Affairs Division for the PSPA, I am writing to comment on the above final-form regulations.

Our organization remains concerned that the regulations do not list the providers able to review and determine laboratory results. We understand the desire to clarify and simplify regulatory language; in this case, listing the physician as the provider to whom the results should be submitted. However, historically we have found that in regulations that rely on delegatory authority by the physician, frequently there is confusion as to whether a provider is actually able to perform the requested task if they are not actually listed in the regulation.

The PSPA is frequently contacted by providers, hospitals, nursing organizations and others asking if physician assistants are permitted to perform a certain task or authenticate a form, because they can't find specific language in a regulation allowing them to do so. This delays care, slows the treatment process and causes frustration for all parties involved.

We would ask that the physician assistants be included once again as providers who are able to review and determine laboratory results.

Thank you.

Sincerely,

Mark S. DeSantis, PA-C  
Chairman, Governmental Affairs Division