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July 25, 2008 #2704

Janet L. Dolan, Director  
Bureau of Driver Licensing  
P.O. Box 68676  
Harrisburg, PA 17106-8676

**RE: Proposed School Bus Drivers Regulations  
Published June 28, 2008**

Dear Ms. Dolan:

As President of the Pennsylvania Medical Society, I am writing to comment on the proposed school bus driver regulations. The proposed regulations were sent to Robert Gabbay, MD, PhD, Executive Director of the Penn State Institute for Diabetes and Obesity at the Penn State Milton S. Hershey Medical Center who provided input regarding Section 71.3. Physical examination (B).

Section 71.3. Physical examination (B) states, "The driver submits to a HbA1C test every 3 months and submits to a diabetic examination ever 6 months, and submits the results of the examination and the results of 2 consecutive HbA1C tests, on a form provided by the Department, *showing an average HbA1C of 8% or lower indicating that the diabetes is under good control.*"

In Dr. Gabbay's opinion, the restriction based on an HbA1C test of less than 8% is too restrictive. If the goal of the regulations is to ensure that people with poorly controlled diabetes leading to *impairment* in their ability to drive are prevented from being school bus drivers, then the HbA1C test cutoff for cognitive impairment should be HbA1C test scores of less than 9%. At an HbA1C of less than 8% there is no evidence of cognitive decline and therefore makes this level too restrictive.

The Pennsylvania Medical Society asks the Department of Transportation to consider these comments prior to the publication of the regulation as final. If there are any questions or

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concerns regarding these comments, please contact either Don McCoy (909-2649)  
or Catherine Wilson (909-2648) at the Medical Society.

Sincerely,



Peter S. Lund, MD, FACS  
President

Cc: Honorable Roger A. Madigan, Majority Chair  
Senate Transportation Committee  
Honorable Joseph F. Markosek, Chair  
House Transportation Committee  
Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission