

#2704.

RE: [unclear]
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Kim Kaufman, Executive Director
Independent Regulatory Review Commission
14th Floor Harristown 2
333 Market Street
Harrisburg, PA 17101

Gerard E. Grega, P.A.-C
2432 Wetzel Run Drive
Weatherly, PA 18255

via e-mail and USPS

August 25, 2008

Ms Kaufman:

RE: IRRC Proposed Rule making Document # 18-411 Department of Transportation - School Bus Drivers (with Diabetes diagnosis)

I am offering commentary with inquiry as to the proposed language change under 67 PA Code, Chapter 71.3 - Physical Examinations (4),(ii), (C), (II) starting with ..."Submit[ting monthly] the computerized glucometer results of blood glucose self-monitoring for review by..."

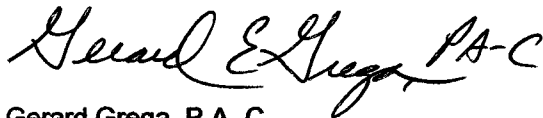
Why is the language being altered/removed, specifically the deletion of - "a physician, certified nurse practitioner, physician's assistant, registered nurse or other health care provider selected by the school district" and replaced with: "...the treating physician or a school transportation physician..."? I believe this will most certainly create an undue hardship on many busy medical practices where these qualified mid-level practitioners currently practice and competently provide these type services already. This current language deletion/alteration only causes further restriction to accessible medical care within our commonwealth which we have been diligently working toward eliminating in recent years.

Alternative language suggested would be as follows: ""Submit[ting monthly] the computerized glucometer results of blood glucose self-monitoring for review by...**the treating physician, school transportation physician, or licensed mid-level health care practitioner treating these patients directly affiliated with the physician's practice**".

Please respond to this inquiry.

I apologize for the lateness of this inquiry/comment.

Thank you,



Gerard Grega, P.A.-C
Pennsylvania Society of Physician Assistants
PSPA Liaison to the Pennsylvania Department of Education