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Ms. Christine A. Hydock
Chief, Medical Programs Division
Federal Motor Carrier Safety Administration
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

**RE: Docket Number FMCSA–2021–0183, Agency Information Collection Activities;
Proposals, Submissions, and Approvals: Non-Insulin-Treated Diabetes Mellitus
Assessment Form**

Dear Chief Hydock,

On behalf of the American College of Occupational and Environmental Medicine (ACOEM), I am writing to express strong support for the proposed Agency Information Collection Activities; New Information Collection Request: Non-Insulin-Treated Diabetes Mellitus Assessment Form, MCSA-5872.

Founded in 1916, ACOEM is the nation's largest medical society dedicated to promoting employee health through preventive medicine, clinical care, research, and education. The College represents more than 4,000 physicians and other healthcare professionals specializing in occupational and environmental medicine (OEM) who are devoted to preventing and managing occupational injuries.

This form will provide Medical Examiners (ME), a standardized, although optional, mechanism to obtain information from the treating clinician. The ME would be able to use this information to evaluate whether the individual's Diabetes Mellitus is stable and controlled. They could consider whether the driver might be at risk of sudden or gradual impairment or incapacitation, from Diabetes Mellitus, any of its co-morbidities such as cardiac or renal disease, or treatment of the condition. An informed, and sound physical qualification determination on those drivers with Diabetes Mellitus, which is not treated with insulin, could then be made.

In response to the specific questions in the Notice and Request for Comments –

- (1) *Whether the proposed collection is necessary for FMCSA to perform its functions:*
 - a) At the current time, there is no standardized resource which provides MEs with a reasonable example of appropriate information to consider when evaluating the medical qualification of the driver with Diabetes Mellitus which is not treated with insulin.

(2) *The accuracy of the estimated burden:*

a) We are unable to estimate the accuracy of the estimated burden.

(3) *Ways for FMCSA to enhance the quality, usefulness, and clarity of the collected information:*

a) We support the use of an information collections forms and that FMCSA suggest that similar to the Optional Medication Form (MCSA-5895), MEs be encouraged to use this to obtain sufficient information to be able to evaluate whether the individual's Diabetes Mellitus is sufficiently stable and controlled, to issue a Medical Examiner's Certificate.

(4) *Ways that the burden could be minimized without reducing the quality of the collected information:*

a) The burden would be reduced if a fillable form were available so treating clinicians could easily complete form and provide a legible document to the ME.

If you should have any questions or need additional information, please contact Dane Farrell (Dane@cascadeassociates.net), ACOEM's Government Affairs Representative.

Thank you for your consideration of these comments and we look forward to collaborating with the FMCSA to carry out its mission to improve the safety of commercial motor vehicles (CMV) and saving lives.

Sincerely,



Kenji Saito, MD, JD, FACOEM
President

American College of Occupational and Environmental Medicine (ACOEM)