

March 18, 2020

Mr. Jim Mullen Acting Administrator Federal Motor Carrier Safety Administration 1200 New Jersey Avenue SE Washington, DC 20590

## Dear Administrator Mullen:

The American College of Occupational and Environmental Medicine (ACOEM) recognizes that the Coronavirus epidemic is causing important disruptions to health care and most other sectors of the economy. Substantial efforts are being made by our members and many others around the country to minimize unnecessary inter-personal contact and to adhere to recommended social distancing practices. Such efforts and concerns have particular impact on interactions between health care providers and their patients, who generally share close proximity and physical contact.

Currently, large numbers of physicians regularly perform periodic medical certification of drivers of trucks and motor coaches according to schedules prescribed under the Federal Motor Carrier Safety Regulations (FMCSRs). These required exams are rarely of an urgent nature. At the current time, performing these exams pose avoidable COVID infection risks to both the drivers and the physician who examine them. In addition, availability of examiners may be affected as they may more urgently be needed to address more significant health care needs and those over 60 are being instructed to shelter in place by some local governments.

In light of the current Federal Emergency Declaration, ACOEM urges that the Department of Transportation (DOT) and the Federal Motor Carrier Safety Administration (FMCSA) grant relief to those drivers whose medical certificates expire over the next 30 days, with that relief to be reviewed and extended as necessary. The goals of our recommendation are to enhance efforts to reduce spread of the virus, to alleviate currently excess demands on the health care system, and to protect health care workers and their patients from avoidable infections. We believe that such short-term relief would not adversely impact current FMCSA efforts to ensure the safety of our roads and highways.

Thank you for your leadership at this important time.

Sincerely,

Stephen A. Frangos, MD, MPH, FACOEM

President

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