



January 22, 2024

Vincent Berg  
United States Coast Guard  
Department of Homeland Security  
2703 Martin Luther King Jr Ave SE  
Washington, DC 20593

**RE: Great Lakes Pilotage Modernization - Attention: USCG-2022-0025**

Dear Mr. Berg,

The American Academy of PAs (AAPA), on behalf of the more than 168,300 PAs (physician assistants/associates) throughout the United States, is pleased to provide comments on the United States Coast Guard's Great Lakes Pilotage Modernization proposed rule. Specifically, AAPA supports the proposed alignment of the medical requirements for Great Lakes pilots with the Merchant Mariner Credential (MMC) medical certification standards (which include PAs). It is within this context that we draw your attention to our comments.

**Streamlining of Medical Requirements**

As highlighted in the comments of Table 1 in the proposed rule, pilots and mariners already use the same form for physical examination (OMB No. 1625-0040). However, current regulations for Great Lakes pilotage only allow for a medical doctor to conduct physical examinations. The comments in the proposed rule put it best in indicating that this restriction "limits the number of practitioners eligible to perform the examinations." This is especially burdensome because "many pilots on the Great Lakes live in remote areas where it is difficult to see a medical doctor and must travel to be seen by a medical doctor, which increases the cost of getting an exam." As proposed, the regulations would amend the requirements and allow PAs (as well as nurse practitioners and designated medical examiners) to perform physical exams for pilots without needing to amend or update the actual form used (the aforementioned OMB No. 1625-0040).

AAPA is in full agreement that PAs can help alleviate the cost and burden of pilots obtaining required physical examinations, especially in remote areas. AAPA therefore fully supports these rules as proposed. PAs are the primary source of care for many patients. According to information provided in an October 2021 Medicare Payment Advisory Commission meeting, in 2018 PAs and Advanced Practice Registered Nurses accounted for a third of all primary care clinicians treating Medicare beneficiaries and up to half of primary care clinicians in rural areas.<sup>1</sup> PAs are responsible for more than 400 million patient visits annually. Patients who routinely rely on a PA for their medical care should not have the continuity of their care disrupted by being required to find a medical

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<sup>1</sup> <https://www.medpac.gov/wp-content/uploads/2021/11/cong-req-vulnerable-access-medpac-oct-2021.pdf>

doctor who the patient may have never met to conduct these physicals. Great Lakes pilot access to a qualified health professional, and the subsequent performing of these physicals, will be enhanced by the ability of PAs to complete and sign the abovementioned form. We urge the coast guard to examine its regulations to determine whether there are any further examples of restrictive language in which modifications to include PAs would support greater and more timely access to care.

PAs are highly trained and educated health professionals who are well-qualified to assess a patient's status, conduct the required physicals, and sign the appropriate form – as demonstrated by their regulatory authority to sign this form in other instances.

Thank you for the opportunity to provide feedback on the United States Coast Guard's Great Lakes Pilotage Modernization proposed rule. For any questions you may have please do not hesitate to contact Michael Powe, AAPA Vice President of Reimbursement & Professional Advocacy, at [michael@apa.org](mailto:michael@apa.org).

Sincerely,

A handwritten signature in black ink that reads "Michael L. Powe". The signature is written in a cursive, flowing style.

Michael L. Powe  
Vice President, Reimbursement and Professional Advocacy