Inquiry:
Section 5.8.1 provides as a minimum requirement that “An operator shall not be using medication that adversely affects his or her ability to perform licensed duties or causes a significant risk of sudden incapacitation” and Section 5.8.2 refers to Table 4 for additional information. Table 4 provides guidance that “Medications with a significant risk of cognitive impairment that may adversely impact the ability to perform licensed duties as determined by the examining physician” are disqualifying such that “Individual shall not perform licensed duties while taking these medications. Individuals shall remain disqualified until they have stopped taking the medication for a time equal to twice the half-life of the medication.”

Many medications in this category have half-lives with significant ranges (e.g., 1-3 days) and the medical impact varies by individual and the number of doses taken. Clarification is required to explain the role of the examining physician in the determination of when an operator can return to licensed duties after taking medications in this category.

Response:
Specifically, for Table 4, Row 1, “Medications with a significant risk of cognitive impairment that may adversely impact the ability to perform licensed duties,” after the licensed operator has stopped taking the medication and if (in accordance with Sections 5.8.4 and 5.8.5) the examining physician determines that the medication no longer “adversely affects his or her ability to perform licensed duties or causes a significant risk of sudden incapacitation,” then the operator meets the minimum requirements of Section 5.8.1 and is no longer disqualified under Section 5.8. However, in the absence of further evaluation by the examining physician, in keeping with the requirements of Table 4, individuals shall remain disqualified until they have stopped taking the medication for a time equal to twice the half-life of the medication.