

## **Attachment A - Assessing Fitness to Drive submission information and template**

*Assessing Fitness to Drive – Commercial and Private Vehicle Drivers (AFTD)* is a joint publication between the National Transport Commission (NTC) and Austroads. Its primary purpose is to increase road safety in Australia by assisting health professionals to:

- assess the fitness of their patients to drive;
- promote responsible behaviour in their patients;
- conduct medical examinations for licensing drivers as required by licensing authorities; and
- provide detail to inform conditional license decisions.

They also aim to provide guidance to licensing authorities in making licensing decisions.

The last major review of the AFTD was published in 2016 with a minor revision in 2017. Since publication there have been medical, legal and social developments that may require changes to the medical standards to ensure they are accurate and reflect current practices. This review will ask relevant stakeholders to identify issues and provide feedback on whether the documents are meeting their intended purpose.

### **Scope of AFTD review**

This review will cover the medical standards, general, and supporting information in AFTD to ensure currency, accuracy, and clarity. The NTC will consider:

- advances in medical knowledge and standard practice;
- new issues affecting medical standards for drivers;
- changes to the driving environment;
- stakeholder feedback on the operation of the current guidelines; and
- findings of recent enquiries (e.g. coronial enquiries).

The NTC and Austroads are also seeking feedback on:

- current initiatives and future opportunities to support and inform about managing medical fitness to drive and transition to non-driving
- opportunities to improve access to the guideline content.

### **Out of scope**

The revision only intends to address (and correct where necessary) the medical criteria within AFTD. The review will not cover the administrative arrangements relating to the application of AFTD. Project scope exclusions include:

- emerging research into gaps in knowledge about medical conditions;
- changes to reporting requirements by doctors to the driver licensing authority when patients have certain conditions;
- variance between jurisdictions, particularly with implementation criteria; and
- any significant shifts in the application of the medical standards. Such as:
  - Assessments of fitness for duty; and
  - Sub-categorisation of drivers for Commercial License assessment

### **Issues for Consideration**

The NTC is seeking feedback on any corrections or modifications required to the following:

#### Part A: General Information

Do you have any comments about Part A: General Information, including technical accuracy, clarity, additional information needed?

#### Part B: Medical Standards

Are updates or additions required because of advances in our understanding of medical conditions or their treatments and implications for the driving task?

Do you have any comments about the explanatory text or the tables outlining medical standards for private and commercial vehicle drivers in the chapter, including 'relevance to the driving tasks' or 'general management guidelines'?

#### Part C: Appendices

What updates, additions, or corrections are required for the information in the appendices?

#### Discovery Work

The NTC and Austroads is seeking feedback on current initiatives and future opportunities to support medical practitioners in managing medical fitness to drive matters with their patients.

#### **How to submit**

Please use the submission template (below) to provide the following responses for:

#### Issue Consideration

1. The part and section to which your feedback applies (indicate new sections or sub sections with an X. E.g. 7.X, 3.2.X);
2. The current guidance or information in AFTD;
3. Details of the issue and why the problem needs to be addressed;
4. Your recommendations and the appropriate changes to this section;
5. The impact of your suggested change on medical assessment or driver licensing;
6. Supporting evidence that substantiates your proposal; and
7. Any additional comment for this issue.

#### Discovery Work

1. Your organisation's policy and advocacy related to fitness to drive
2. Approaches to awareness raising for members
3. Activities to support knowledge and skill related to fitness to drive assessment
4. Resources developed or promoted about fitness to drive
5. Effectiveness of the AFTD design and format (hardcopy, PDF or online) in facilitating medical assessment.
6. Opportunities to incorporate the content into existing resources used by health professionals.

This consultation period will be **open until 9 November 2020**.

Please provide your feedback to the NTC as a .doc or .docx file which can be emailed to [jdavey@ntc.gov.au](mailto:jdavey@ntc.gov.au).

**Assessing Fitness to Drive - Submission Form**

Contact Name	Organisation	Phone	Email
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**Issue Consideration**

Issue	Part (A, B, C)	Section (7.2, 4.2.X, etc).	Page, Figure, or Table	Provide details on the issue and why it needs to be addressed.	If you have a recommendation to the issue, please describe.	Outline anticipated effects of your recommendation for; <ul style="list-style-type: none"> <li>health professionals;</li> <li>driver licencing authorities; or</li> <li>drivers.</li> </ul>	Please provide any supporting evidence or information.	Please provide any other comment you have on this issue.
1	B	4.2	67	<p>AudA recommends the inclusion of a vestibular and balance assessment as part of the driving screening assessment procedure.</p> <p>Individuals with a vestibular disorder or postural instability can experience disorientation - for example - when turning their heads such as with a shoulder check. Visual input can also be affected by objects moving in peripheral vision.</p>	<p>AudA recommends the inclusion of the following question: "Has the person been diagnosed with a vestibular disorder or balance issues now or in the past?"</p> <p>If the answer is yes, follow up questions may include: "Do you consider the condition would impact on the person's ability to drive?" and "Is further investigation and opinion required regarding the person's vestibular function or postural instability as it pertains to driving?"</p> <p>The opinion will be provided by a health professional (i.e. physiotherapist, Ear Nose and Throat specialist, vestibular audiologist).</p> <p>If the answers are affirmative, a vestibular audiologist can proceed to assess the person's condition via vestibular and balance tests and note the outcome.</p>	<p>Drivers are assessed for vestibular deficits/loss, which can impact on the ability to drive safely.</p>		<p>Examples of vestibular disorders include: Meniere's Syndrome, Vestibular Neuritis/Labyrinthitis, Vestibular Migraine, bilateral vestibular loss, hypotension induced vertigo, drop attacks, Benign Paroxysmal Positional Vertigo.</p> <p>AudA notes that there is not a significant number of vestibular audiologists working in the community and the demand for vestibular tests is not likely to be great.</p>
2	B	4.2	67	<p>The General assessment and management guidelines state that: "If the standard is not able to be met with a hearing aid, this in itself does not disqualify the person from driving. They should be offered individualised assessment to determine their eligibility for a conditional licence. This may comprise: <b>medical assessment by an ear, nose and throat (ENT) specialist or audiologist...</b>"</p> <p>AudA has received the following member queries in regard to the "medical assessment":</p> <ul style="list-style-type: none"> <li>- Is the medical assessment a new requirement for audiologists?</li> <li>- What does the medical assessment involve?</li> <li>- What training can AudA provide to enable audiologists to undertake this test?</li> </ul> <p>To the best of AudA's knowledge, the "medical assessment" is not meant to be a new requirement for audiologists when assessing people's fitness to drive. Instead, the requirement refers to audiologists undertaking a hearing test. However, the wording makes it appear that a medical assessment is also required or needs to be involved in some way. <b>We consider this appropriate for</b></p>	<p>We ask that this issue be clarified in future versions of the Assessing Fitness to Drive Guidelines to prevent confusion amongst audiologists who may mistakenly believe that the "medical assessment" is an extra requirement they need to complete.</p>	<p>Audiologists have a clear understanding of what the requirements are under the General assessment and management guidelines and understand the individualised assessment process.</p>		

				<p><b>medical professionals such as ENTs but not for audiologists who undertake the non-medical management of hearing loss</b> based on the profession’s scope of practice and professional requirements.</p> <p>AudA understands that when the new edition of Assessing Fitness to Drive was published in 2016, it was intended to restate the existing process for testing the hearing of commercial drivers (p. 67-70; Diagram 11) so as to be clearer and to provide for greater flexibility and individualised assessment of a person’s hearing to help determine their licence status. This included the list of specific considerations for the individualised assessment process.</p> <p>The <a href="#">background notes to the revised 2016 Assessing Fitness to Drive part on “Hearing loss and deafness” (p. 16)</a> also states: “Definition of specialist: Clarity around the appropriate specialist was requested, with stakeholders indicating that an Ear Nose and Throat (ENT) specialist or an audiologist alone may not be equipped to make the assessment in relation to driving and suitable modifications.”</p> <p>While it seems that the change in the “Hearing loss and deafness” section (p. 67) is based on the rationale in the background notes, it is nonetheless worded in such a way that has confused audiologists seeking to follow the process and check a driver’s hearing by making it seem that there is an extra requirement for audiologists to undertake a “medical assessment” of the driver, which is not the case.</p>				
3	B	4.2	67	<p>AudA notes that aided drivers with acquired or age-related hearing loss would benefit from periodic reviews as their hearing condition can change over time and/or their adaptation to aided driving.</p>	<p>AudA recommends an annual review for aided drivers with acquired or age-related hearing loss.</p>			
4	B	4.3	69	<p>The following statement in the Medical standards for licensing – Hearing table requires an amendment: “For the purposes of this document <b>an audiologist is a person registered with Audiology Australia</b>”.</p> <p>The statement should be amended to: “For the purposes of this document <b>an audiologist is a person certified by Audiology Australia as an Audiology Australia Accredited Audiologist</b>”.</p>				
Etc.*								

\*Insert a new row as required.

## Discovery Work

### Policy and Advocacy

Please describe any current policies, position statements or other advocacy activities undertaken by your organisation in relation to fitness to drive or transition to non-driving.

Earlier this year, AudA contacted the National Transport Commission in relation to the use of the term “medical assessment” (issue 2).

Please identify needs and opportunities in this regard for your organisation. e.g.

- promotion and implementation of current policies / position statements;
- development of new policies / position statements;
- other advocacy opportunities

### Awareness raising for members

Please describe any current or recent activities aimed at raising awareness among your members regarding fitness to drive or transition to non-driving.

Please identify areas of need in relation to awareness raising for your members, as well as any opportunities to improve awareness raising. For example:

- What key messages need to be communicated about fitness to drive?
- What other key messages need to be communicated?
- What mechanisms of communication are available through your organisation?
- What opportunities are there to link with Austroads communication?

### Member education

Please describe any current or recent activities aimed at improving knowledge and skills of your members regarding fitness to drive or transition to non-driving.

Please identify areas of need in relation to education of your members, as well as any opportunities for your organisation or for Austroads and the NTC to improve education. For example:

- What aspects of managing fitness to drive need to be the focus of education?
- Do your members understand the medical condition reporting process and responsibilities?
- How can fitness to drive education be integrated into your current education offerings?

### Information Resources

Please describe any resources developed or promoted by your organisation to support members in managing fitness to drive and transition to non-driving.

Please identify areas of need in relation to resources, as well as any opportunities for your organisation or Austroads and the NTC to improve access to appropriate resources.

- Are members aware of supporting resources available through Austroads or licensing agencies?

- Are members aware of resources available through consumer and patient support organisations?
- Are additional resources required to facilitate / support the fitness to drive process?

**Content accessibility**

Please describe any issues you experience accessing the AFTD medical criteria or supporting information. What design elements (figures, diagrams, tables, etc) are useful and should be preserved or expanded in the next edition?

Please nominate ways to improve access and general use of the AFTD content for health professionals?

- Is there value in trying to have the content integrated into practice or patient management software?
- Would online CPD training units be useful?
- What other types integration should we consider?