



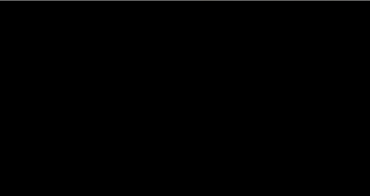
SOUTH AUSTRALIA

AUSTRALIAN MEDICAL ASSOCIATION
(SOUTH AUSTRALIA) INC.

ABN 91 028 693 268

10th June 2021

National Transport Commission
Level 3, 600 Bourke St
Melbourne VIC 3000



Re: Assessing fitness to drive guidelines

On behalf of the Road Safety Committee of the Australian Medical Association in South Australia (AMA(SA)), I thank you for the opportunity to contribute feedback to the Assessing Fitness to Drive draft guidelines and review report, as provided at the National Transport Commission website.

As background AMA(SA) has for many years had a dedicated Road Safety Committee, in line with members' belief that the AMA should be advocating strongly for safer roads and traffic conditions in this state. In that time, we have regularly met to discuss aspects of driving, traffic conditions and how best to advise patients and communities about their and others' driving capabilities.

As such, our committee has reviewed your guidelines and the report with interest, and sought feedback from our committee members, who include medical practitioners and non-medical experts in the field.

In general, we are satisfied with the approach and the guidelines, and particularly note with approval the new sections, which include an overdue reference to medical marijuana use. We have identified some concerns and discuss them according to subject matter.

Communication between medical professionals – vision and eye disorders

In relation to vision and eye disorders (Section 10.1.1 on page 190), the medical practitioners on our committee note that it often falls to general practitioners (GPs) to identify and follow-up on suspected visual conditions that may affect a patient's ability to drive according to appropriate safety standards. They suggest that – as is the case in other areas of patient-focused health care – it would be beneficial if ophthalmologists, optometrists and GPs communicated as much as possible about a patient's visual capacity and the impact of this on their fitness to drive. Similarly, ophthalmologists and optometrists could be encouraged to raise the issue with their patients, and complete relevant documentation, rather than require the patient to arrange an additional consultation with their GP for this purpose.

Clearly, this is particularly important if a vision assessment indicates a patient is not fit to drive, and the general practitioner and any other relevant doctors should be informed.

your AMA

your voice

your profession

'Health assessments' and 'GP management plans'

We wish to point out what we believe may be an error due to confusion between the two similarly titled 'Health Assessment' and 'GP Management Plan' and ask that this be corrected in the final review processes.

Section 2.2.1 of the draft guidelines (page 13), with the heading 'Assessing medical conditions and driving', refers to engaging an occupational therapist to assist in assessing capacity to drive. There is a statement (in brackets), '(t)his assessment may be available under the Medicare Care plan for people with multiple disabilities as well as for those turning 75 years'.

Although patients with a 'GP Management Plan' (previously, and still often informally, known as a 'care plan') and 'Team Care Arrangement' (both are required), may be eligible for referral to an occupational therapist under Medicare, we point out that the information misrepresents the eligibility for GP Management Plans. To Whom it may concern

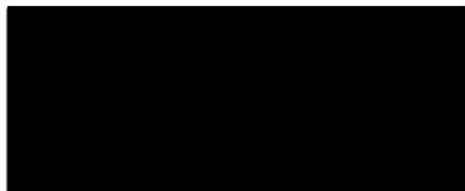
Any patient with a chronic medical condition is eligible for a GP Management Plan (multiple disabilities are not required); if a minimum of two health care providers other than the GP are involved in the patient's care, a Team Care Arrangement can also be established. Age plays no part in this. We suggest that there may have been some confusion between the GP Management Plan and the aged-related 'Health Assessment', for which patients do become eligible at the age of 75. However, these do not entitle the patient to Medicare-funded allied health services. Please see [https://www1.health.gov.au/internet/main/publishing.nsf/Content/F0ABED13C55F6715CA257BF0001EDB18/\\$File/Fact%20Sheet%20-%20CDM%20-%20Provider%20Info.pdf](https://www1.health.gov.au/internet/main/publishing.nsf/Content/F0ABED13C55F6715CA257BF0001EDB18/$File/Fact%20Sheet%20-%20CDM%20-%20Provider%20Info.pdf) for confirmation.

Measuring cognitive and motor skills

Our committee notes that the task of assessing fitness to drive relies to a large extent on doctors' subjective assessments of cognitive capacity and motor skills. We suggest that objective, evidence-based measures would be extremely valuable for medical practitioners in assessing fitness to drive and justifying our decisions. They would also provide evidence to help with the often distressing discussions with patients and carers, particularly when we judge a patient to no longer be fit to drive, and would provide important data for any legal cases that may eventuate from a decision or a driver continuing to operate a vehicle after an assessment. We strongly recommend that more research into the development of such objective measures be undertaken.

I hope this feedback helps you finalise guidelines that – in even their draft stage – our committee have found to be thoughtful and informative. Should you wish to discuss this feedback, please contact me at any time.

Yours sincerely



AMA(SA) Road Safety Committee