

11 June 2021

Dear National Transport Commission,

Re: ACAud submission to National Transport Commission's Assessing Fitness to Drive (AFTD) May 2021 draft for consultation purposes

The Australian College of Audiology (ACAud) is grateful for the invitation to make a submission in response to the NTC's May 2021 consultation draft of the Assessing Fitness to Drive (AFTD) for commercial and private vehicle drivers.

ACAud provides the following response to the consultation report *Question 1: Are the proposed changes to Assessing Fitness to Drive appropriate? Please comment on matters relevant to the topic and provide evidence (i.e., data, research or documentation) to support your views. Where possible, also provide a proposed solution (i.e., corrective wording) to the issues identified:*

We thank the NTC for addressing ACAud's feedback at the beginning of the review in October 2020 regarding the health professionals that can assess and treat hearing loss. We are grateful to see that most of our feedback has been addressed. However, there appears to be one omission from the table on 4.3 that appears to be an error based on the revisions made under 4.2.1.

The revised text under section 4.2.1 (pp.105-106) now correctly reflects the roles of health professionals, including audiologists and audiometrists, in the diagnosis and treatment of hearing impairments.

However, the table outlining this same information under 4.3 remains incorrect regarding the role that audiometrists play in assessing the need for hearing aids, fitting and appropriately setting the frequency of a hearing aid, as well as determining whether the standard can be met with a hearing aid. The revised information under 4.3 therefore contradicts the revisions made under section 4.3 (p.108). The information included under column 3 "Commercial Standards" of the table on page 108 is simply corrected by including audiometrists as follows (proposed revisions in red):

Compliance with the standard should be clinically assessed initially. If the initial clinical assessment indicates possible hearing loss, the person should be referred for audiometry.

A person is **not** fit to hold an **unconditional licence**:

- if the person has unaided hearing loss ≥ 40 dB in the better ear (averaged over the frequencies 0.5, 1, 2 and 3 KHz).

A **conditional licence** may be considered by the driver licensing authority subject to **periodic review**,* taking into account the nature of the driving task and information provided by an **ENT specialist**, ~~or~~ **audiologist** **or audiometrist**,** as to whether:

- the standard is able to be met with a hearing aid.***

If the standard is **not** able to be met with a hearing aid, further individualised assessment should be offered.

A **conditional licence** may be considered by the driver licensing authority subject to **periodic review**,* taking into account:

- the nature of the driving task; **and**
- information provided by an ENT specialist or audiologist;** **and**
- the results of a practical driver assessment if required.

This feedback is in line with the nationally accepted scopes of practice for audiologists and audiometrists in Australia, including the hearing professional bodies and Government regulatory bodies such as the Hearing Services Program. The Scope of Practice for audiologists and audiometrists (<https://www.acaud.com.au/documents/item/148>) approved by all three Government-recognised professional bodies provides detailed information on the clinical tasks and services that are able to be provided by audiologists and audiometrists. For more information on the registration/clinical certification of audiologists and audiometrists in Australia and recognition under Government programs and legislation (including links to relevant legislation), see: <https://auderc.org.au/faqs/how-are-hearing-service-practitioners-regulated/>.

Please do not hesitate to contact us if you require any further information on any of the issues we have raised in this response.

Yours Sincerely,

