

10/6/2021

**To National Transport Commission**

**Re: Amendments to Assessing Fitness to Drive 2021 Guidelines**

**Question 1 response:** 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

**Response:** The section 10.2.1 on Visual Acuity requires modification.

This statement: **'However, a driver licence will not be issued when visual acuity in the better eye is worse than 6/24 for private vehicle drivers.'** Should be deleted/modified

- The 1<sup>st</sup> step is to delete the above statement in 10.2.1. as it is repetition of 10.3, the Assessing Fitness to Drive should aim to be succinct to be more easily understandable
- Secondly the above statement should be reworded in 10.3 as
  - This statement is not supported by evidence to confirm that 6/24 VA should be the cut off for all driving. Rather as 6/12 acts a flag for a conditional licence, 6/24 should flag extra conditions.
  - Evidence has shown that drivers with vision worse than 6/12 (and worse than 6/24), that drive with conditional licences have matched the driving performance of drivers without vision impairment (Wood et al. 2013; Melis-Dankers et al. 2008; Moharrer et al. 2020; Wang et al. 2020)
  - Individuals with visual acuity in the better eye worse than 6/24, might be able to drive on a case-by-case basis, and using bioptic telescope devices.(Wood et al. 2013; Melis-Dankers et al. 2008; Peli 2008; Owsley 2012)

Recommendation to delete and rephrase the above statement in 10.3 with:

**'Some discretion is allowed in application of the standard by the treating optometrist or ophthalmologist in making recommendation to the driving licensing authority for a conditional driver's licence, when the visual acuity in the better eye is between 6/12 and 6/24, or in specialised cases and with added licence conditions when the acuity is worse than 6/24.'**

1. In response to 10.2.8: **Telescopic lenses (bioptic telescopes)** Drivers who wish to use these devices require individual assessment by an optometrist or ophthalmologist.

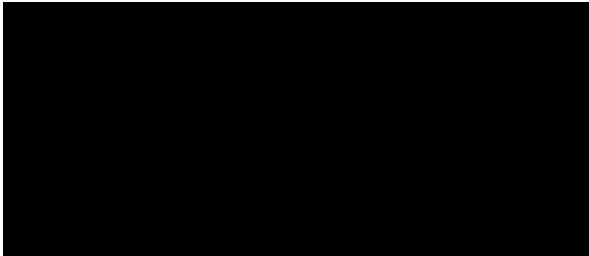
This statement should be followed with the following explanation:

Additionally, these drivers will require extensive training (both pre-driver on how to use the bioptic-device and behind-the-wheel and compensatory skills training) according to international established bioptic driving programs.(Dougherty et al. 2015; Wang et al. 2020; Moharrer et al. 2020),

**Question 2 response:** Please describe your experience using the current Assessing Fitness to Drive medical criteria or supporting information. What sections or content are most valuable?

As an optometrist, university academic and researcher I access the Assessing Fitness to Drive Guidelines repeatably. I access the Vision and eye disorders section as it is related to my discipline. The Guidelines section is clear and easy to access and understand. 10.2 would be better if it were more succinct and if formatted in dot point form.

Regards



- Dougherty, Bradley E., Roanne E. Flom, Mark A. Bullimore, and Thomas W. Raasch. 2015. 'Previous driving experience, but not vision, is associated with motor vehicle collision rate in bioptic drivers ', *Invest Ophthalmol Vis Sci*, 56: 6326-32.
- Melis-Dankers, Bart J. M., Aart C. Kooijman, Wiebo H. Brouwer, Rens B. Busscher, Ruud A. Bredewoud, Peter H. Derksen, Anoeska Amersfoort, Martin A. M. Ijsseldijk, Geert W. van Delden, Thea H. P. A. Grotenhuis, and Jaap M. D. Witvliet. 2008. 'A demonstration project on driving with reduced visual acuity and a bioptic telescope system in the Netherlands', *Vis Impair Res*, 10: 7-22.
- Moharrer, Mojtaba, Shuhang Wang, Bradley E Dougherty, Walter Cybis, Brian R Ott, Jennifer D Davis, Gang %J Translational Vision Science Luo, and Technology. 2020. 'Evaluation of the driving safety of visually impaired bioptic drivers based on critical events in naturalistic driving', 9: 14-14.
- Owsley, Cynthia. 2012. 'Driving with bioptic telescopes: organizing a research agenda', *Optom Vis Sci*, 89: 1249-56.
- Peli, Eli 2008. 'Driving with low vision: who, where, when, and why.' in Robert Massof (ed.), *Albert and Jakobiec's Principles and Practice of Ophthalmology* (Elsevier: Philadelphia).
- Wang, Shuhang, Mojtaba Moharrer, Vilte Baliutaviciute, Bradley E Dougherty, Walter Cybis, Alex R Bowers, Gang %J Translational Vision Science Luo, and Technology. 2020. 'Bioptic telescope use in naturalistic driving by people with visual impairment', 9: 11-11.
- Wood, J. M, G. McGwin, J. Elgin, K. Searcey, and C. Owsley. 2013. 'Characteristics of on-road driving performance of persons with central vision loss who use bioptic telescopes', *Invest Ophthalmol Vis Sci*, 54: 3790-7.