



**RNAO feedback on
Improvements to the Ministry
of Transportation's Medical
Reporting Program**

Submission to Ministry of Transportation

October 9, 2017



Summary of RNAO recommendations

Recommendation 1. RNAO endorses the inclusion of nurse practitioners, regardless of practice setting, as part of medical practitioners mandated to report to MTO.

Recommendation 2. RNAO supports clearly defining a list of medical conditions and functional impairments that should be reported to MTO.

Recommendation 3. RNAO agrees that temporary medical conditions and functional/visual impairments should be reported to MTO. Affected individuals should be given a temporary suspension of their driver's license which, once the condition has cleared, should be reported by the health-care provider (i.e. NP, physician), thereby lifting the patient's temporary suspension.

Introduction

The Registered Nurses' Association of Ontario (RNAO) is the professional association representing registered nurses (RN), nurse practitioners (NP), and nursing students in all settings and roles across Ontario. Since 1925, RNAO has advocated for healthy public policy, promoted excellence in nursing practice, increased nurses' contributions to shaping the health system, and influenced decisions that affect nurses and the public they serve.

RNAO welcomes the opportunity to provide feedback to the Ministry of Transportation's (MTO) proposed regulatory amendment to the *Highway Traffic Act* to improve medical reporting and eliminating driver license returns. Our recommendations take into consideration the safety of drivers on Ontario's roads as well as the impact of the proposed changes as they relate to NPs' ability to practice to their fullest scope. The recommendations were synthesized by surveying the opinions of NPs that are members of RNAO. NPs that make up RNAO's membership come from various health-care sectors including acute care, primary care, long-term care and home care.

Mandatory reporting by nurse practitioners

We support including NPs as part of the list of health-care professionals that are mandated to report individuals with medical conditions and functional/visual impairments. This will broaden access to mandatory reporting, and thereby enhance road safety in Ontario.

NPs' scope of practice continues to evolve in Ontario¹. Allowing nurse practitioners to report medical conditions and functional/visual impairments that make it unsafe for individuals to drive is congruent with NPs' responsibility and accountability with keeping the public safe, and consistent with the NPs' expanding scope of practice. Our NP members with whom we consulted felt that this responsibility should apply in all NP practice settings.

Recommendation 1. RNAO endorses inclusion of NPs, regardless of practice setting, as part of medical practitioners mandated to report to MTO.

Defined list of medical conditions and functional/visual impairments

A clearly defined list of reportable medical conditions and functional/visual impairments that can impact driving safety will assist health-care providers in determining whether a patient satisfies the criteria of an unsafe driver. A readily accessible reference of medical conditions and functional/visual impairments that qualifies an unsafe driver would expedite the reporting process by the health-care provider to MTO, thereby maintaining the safety of Ontario's roadways.

Recommendation 2. RNAO supports clearly defining a list of medical conditions and functional impairments that should be reported by designated health providers to MTO.

Reporting temporary conditions

Temporary medical conditions and functional/visual impairments can result in injurious fatalities². For example, individuals with an acute traumatic injury to the face can have soft tissue swelling that impacts one's ability to see clearly. Similarly, an individual with a stable and well-managed thyroid disorder can temporarily fluctuate into a hypothyroid state making the individual impaired and unsafe as a driver. Therefore, RNAO feels that health-care providers should report temporary medical conditions and functional/visual impairments that affect one's ability to drive to MTO. The patient should have their driver's license temporarily suspended until a health-care provider has reported that the condition has cleared.

Recommendation 3. RNAO agrees that temporary medical conditions and functional/visual impairments should be reported to MTO. Affected individuals should be given a temporary suspension of their driver's license which, once the condition has cleared, should be reported by the health-care provider (i.e. NP, physician), thereby lifting the patient's temporary suspension.

References:

¹College of Nurses' of Ontario (2014). FAQs: Bill 179. Retrieved from <http://www.cno.org/en/what-is-cno/regulation-and-legislation/legislation-governing-nursing/faq-bill-179/>.

²Vernon, DD, Diller, EM, Cook, LJ, Reading, JC, Suruda, AJ, & Dean, JM. (2002). Evaluating the crash and citation rates of Utah drivers licensed with medical conditions, 1992-1996. 34(2), 237-246.