



October 20, 2023

Mandy K. Cohen, MD, MPH  
Director  
Centers for Disease Control and Prevention  
295 E. Street, S.W. Washington, D.C. 20024  
RE: CDC–2023–0070

Dear Director Cohen:

The American Optometric Association (AOA) welcomes the opportunity to provide feedback on the Center for Disease Control and Prevention’s (CDC) proposed information collection project “National Health Interview Survey (NHIS).” The AOA represents more than 49,000 doctors of optometry, optometric professionals, and optometry students. Doctors of optometry take a leading role in providing vision rehabilitation services for people with vision impairment, low vision or blindness. They also play an important role in the management of systemic diseases with ocular manifestations that, if untreated, can lead to vision impairment, low vision, or blindness. The AOA serves the needs of the public and health professionals through the provision of evidence-based clinical practice guidelines that promote prevention, identification, treatment, and management strategies for eye and vision conditions/diseases to improve the nation’s health. These clinical guidelines are based on vision health surveillance that captures vital data on the prevalence of eye diseases and their impact on populations. However, no national visual health surveillance system currently provides comprehensive, nationally representative data on eye disease prevalence and visual health disparities in the U.S. population.<sup>1</sup> As such, the AOA strongly encourages the CDC to permanently include in the NHIS the sponsored content on vision health from the 2023 module, which includes the following questions:

- 1) Have you EVER been told by a doctor or other health professional that you had diabetic retinopathy?
- 2) Have you lost any vision due to diabetic retinopathy?
- 3) Have you EVER been told by a doctor or other health professional that you had glaucoma?
- 4) Have you lost any vision due to glaucoma?
- 5) Have you EVER been told by a doctor or other health professional that you had macular degeneration?
- 6) Have you lost any vision due to macular degeneration?
- 7) Have you EVER had cataract surgery?
- 8) Have you EVER been told by a doctor or other health professional that you had cataracts?
- 9) Have you lost any vision due to cataracts?

Prevalence estimates of major eye diseases are usually drawn from meta-analyses of population-based study data, which are not contemporary and lack national representativeness. Current national health surveillance systems that ask questions related to vision health use population samples that aren’t

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<sup>1</sup> The Vision and Eye Health Surveillance System only assesses the visual health of the Medicare population.

representative of the entire U.S. population, and they don't assess the prevalence of eye diseases that are most likely to cause low vision and vision impairment. For example, the NHIS annually only asks three core vision-related questions in both its sample adult and sample child questionnaires, and they only assess whether the respondent has been prescribed corrective eyewear. They ask neither what caused the respondent's vision impairment, nor if the respondent has access to vision care beyond a yearly eye exam.

The questions that the CDC is proposing to remove from the NHIS assess the prevalence of major eye diseases that often lead to vision impairment and loss. In the next 30 years, the number of adults with visual impairment and/or age-related eye disease is expected to double due to the aging of the United States population and the increase in diabetes and other chronic diseases.<sup>2</sup> It is estimated that at least 40 percent of vision loss in the United States is either preventable or treatable with timely intervention, yet many people are undiagnosed and untreated.<sup>3</sup> The diagnosis and treatment of eye diseases and vision problems can result in improved visual function and health-related quality of life for adults of all ages. Given the significant impact of eye health on overall health, we believe that it is critical to obtain patient centered data related to eye health and vision care. Without this data, we believe it will be a bigger challenge to meet the objective of NHIS to monitor the health of the United States population, and it would delay early intervention and treatment of diseases that result in visual impairment.

The AOA strongly encourages the CDC to permanently include in the NHIS the sponsored content on vision health from the 2023 module. If more information is needed, please contact Colby Tiner at [ctiner@aoa.org](mailto:ctiner@aoa.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Benner O.D.", with a stylized flourish at the end.

Ronald Benner, OD  
President, American Optometric Association

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<sup>2</sup> Wittenborn JS, et al. 2021. The Prevalence of Diagnosis of Major Eye Diseases and their Associated Payments in the Medicare Fee-for-Service Program. *Ophthalmic Epidemiol.* Sep 16:1-13.

<sup>3</sup> Rowe S, et al. 2004. Preventing Vision Loss from Chronic Eye Disease in Primary Care: Scientific Review. *JAMA*: 291:1487-95.