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**CHILDREN'S  
VISION  
COALITION**

**FOCUSING ON THE  
EYES OF THE FUTURE**

August 16, 2012

Ms. Danielle Holahan  
New York State Health Benefits Exchange  
New York State Department of Health  
Empire State Plaza  
Corning Tower  
Albany, NY 12237

Re: The need for comprehensive pediatric vision benefit

Dear Ms. Holahan:

The Children's Vision Coalition ("CVC") of New York, a not-for-profit organization dedicated to promoting the value of comprehensive eye examinations for children, appreciates the opportunity to share with you our views on the pediatric vision benefit that is among the required "Essential Health Benefits" that must be offered through the Health Benefit Exchange in New York.

By way of background, CVC brings together educators, healthcare professionals, private industry, philanthropists and political leaders to solidify a common commitment to the preservation of sight and quality of life. With high profile public awareness campaigns, ongoing advocacy with city and state governments and healthcare education agencies, CVC seeks to insure accessibility to vision care for all regardless of their ability to pay, and works to insure early detection and treatment providers for each and every child.

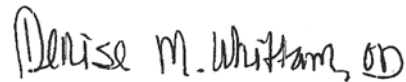
We were very pleased that the ACA specifically identified the pediatric vision benefit as a necessary component of the Essential Health Benefits to be offered through the Health Benefit Exchange. In defining how this mandate should be implemented, we would urge New York State to require that a comprehensive and complete pediatric vision benefit be offered through the Exchange that would provide, at a minimum, an annual comprehensive vision and eye health examination for all children by an optometrist or ophthalmologist, which would include the diagnosis and treatment of diseases, refractive errors, binocular disorders and injuries of the eye, adnexa and visual system, as well as any required treatment, including the use of corrective devices and other therapeutic procedures.

The benefit should be offered in a way that is as seamless and as integrated as possible with the balance of the children's health benefits. Separating vision benefits from the rest of the medical benefits often results in uncoordinated care. Fully integrating the benefit within the health benefits offered on the exchange will improve the coordination and lower the cost of care.

It is, moreover, critically important that the pediatric vision benefit cover more than merely a vision screening that might be part of a routine well child visit. Most vision screenings only check to determine how well a person can see at a distance. Comprehensive vision exams include tests to determine myopia, hyperopia, astigmatism, eye coordination and eye muscle function, eye focusing abilities and an overall eye health exam, which in most cases involves dilation. Vision screenings do not measure color vision or visual perception among other important visual abilities. Screenings may indicate a need for further evaluation, but often miss many children with vision problems. Eye exams are integral to diagnosing diseases and disorders in children, as well as diagnosing and treating eye and vision problems that, if left untreated, can lead to vision loss and other issues significant to a person's quality of life and, without question, may have a profound impact on the child's ability to succeed in school

We would be very pleased to serve as a resource to you and your colleagues as you approach these issues and to share with you the latest research and other evidence that may inform your decisions relating to the pediatric vision benefit. We appreciate your consideration of our views and look forward to working with you to advance the vision care needs of New York's children.

Sincerely,

A handwritten signature in black ink that reads "Denise M. Whittam, OD". The signature is written in a cursive style with a loop at the end of the last name.

Denise Whittam. O.D.  
President, Children's Vision Coalition