



# AMERICAN OPTOMETRIC ASSOCIATION

Steven Reed, O.D.

**President, American Optometric Association**

May 13, 2024

The Honorable Marriannette Miller Meeks  
U.S. House Committee on Veterans' Affairs  
Chair, Subcommittee on Health  
364 Cannon House Office Building  
Washington, D.C. 20515

The Honorable Julia Brownley  
U.S. House Committee on Veterans' Affairs  
Ranking Member, Subcommittee on Health  
364 Cannon House Office Building  
Washington, D.C. 20515

Re: U.S. House Committee on Veterans' Affairs Subcommittee on Health 5/13/24 Field Hearing: Iowa: A Leader in Veteran Healthcare Innovation

Dear Chair Miller Meeks and Ranking Member Brownley,

The American Optometric Association (AOA) represents more than 49,000 doctors of optometry, optometric professionals, and optometry students, including many of the more than 1,100 Department of Veterans Affairs (VA) doctors of optometry now on the frontlines providing nearly three-quarters of all primary and medical eye care services to millions of Veterans in communities across the country. AOA appreciates this opportunity to provide insights into the evolving role of Artificial Intelligence (AI) in the delivery of VA eye care as we continue striving to ensure that our nation's Veterans have access to the world-class vision and eye health care they need and deserve, when and where they need it.

Today, VA doctors of optometry care for more than 70 percent of the total unique Veteran visits involving eye care services annually, including 73 percent of the 2.5 million selected ophthalmic procedures and nearly 99 percent of services in low vision clinics and blind rehabilitation centers. VA optometrists are currently practicing at 95 percent of the VA sites where eye care is offered and are often the only licensed independent eye care practitioner available to Veteran patients. Right now, vision and eye health care is the third-most requested service by Veteran patients, behind only primary care and mental health care services. With VA optometrists providing the vast majority of eye care services to Veterans, AOA believes that doctors of optometry have an important voice and role to play in the ongoing discussion regarding the future of AI in the delivery of VA eye care.

To be sure, ensuring safety of the use of AI in health care is critical. The AOA believes that AI should be evaluated based on whether it can improve patient outcomes and has high sensitivity and specificity.

Systems using AI to identify patient risk of disease must be held accountable to ensure that referral loops are closed. It is clear that the value of AI cannot be based solely on the accurate identification of disease risk. The value of AI must be assessed based on whether patients identified with potential disease risk receive necessary care and follow up.

As AI in health care expands, AOA believes that important criteria must be met:

- AI should be evaluated based on whether it can improve patient outcomes and has high sensitivity and specificity.
- Systems using AI to identify patient risk of disease must be held accountable to ensure that referral loops are closed.
- The value of AI cannot be based solely on the accurate identification of disease risk. Rather, the value of AI must be assessed based on whether patients identified with potential disease risk receive necessary care and follow up.
- Efforts must be made to identify and address bias in AI systems.
- Ongoing education is critical for patients and doctors to understand both the limitations and potential uses of AI in health care.<sup>1</sup>

AOA has continued to recommend that an advisory group be created to develop regulatory guidance on the use of AI in eye care and health care more broadly, including care delivered at VA. We would welcome the opportunity to provide recommendations for doctors of optometry to be included on this expert panel.

Thank you, again, for the opportunity to provide insights into the evolving role of AI in the delivery of eye care within the VA. With VA optometrists providing the vast majority of eye care services to Veterans in communities across the country, AOA believes that doctors of optometry have an important voice and role to play in the ongoing discussion regarding the future of AI in the delivery of VA eye care. If you have questions or would like further information, please do not hesitate to contact me or AOA staffer, Matt Willette ([mwillette@aoa.org](mailto:mwillette@aoa.org)).

Sincerely,



Steven Reed, OD

**President, American Optometric Association**

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<sup>1</sup> [https://www.aoa.org/AOA/Documents/Advocacy/position%20statements/AOA\\_Policy\\_Telehealth.pdf](https://www.aoa.org/AOA/Documents/Advocacy/position%20statements/AOA_Policy_Telehealth.pdf)