



CANADIAN ASSOCIATION OF OPTOMETRISTS
ASSOCIATION CANADIENNE DES OPTOMÉTRISTES

Written Submission for the Pre-Budget Consultations in Advance of the Upcoming Federal Budget

The Canadian Association of Optometrists

August 2023



Recommendation 1: That the Government of Canada prioritizes the vision health of all Canadians through the investment in a National vision Strategy through the Public Health Agency of Canada, under the leadership of a Chief Vision Officer.

Recommendation 2: That the Government of Canada prioritizes the improvement of access to vision care for Canada's Indigenous communities.

Recommendation 3: That the Government of Canada actively engages in funding much-needed vision research that addresses the specific needs of Canadians.



The Canadian Association of Optometrists appreciates the opportunity to contribute to this government's current call for submissions through the Pre Budget process to the House of Commons Finance Committee (FINA). We commend and join with the current government in acknowledging the importance of achieving health equity for our most vulnerable communities and populations. The necessity of making substantial investments to ensure that all Canadians have access to vision care services is of paramount importance for addressing the overall health of all Canadians. Optometrists from coast to coast are eager to actively participate in dialogue, drawing from their firsthand experience as primary eye health practitioners and small business owners.

Our submission intends to convey the willingness of Canadian optometrists to work collaboratively with the federal government by contributing to a growing and prosperous economy and a healthy population. Current efforts are certainly not enough, where vision health is not recognized as being an integral part of overall health nor a key element of population health. Incredibly, vision policy is absent at Health Canada, and the Public Health Agency of Canada, thus CAO is urging the federal government to recognize and implement the three recommendations outlined in this submission. Optometrists' desire to be leaders in delivering better vision for all Canadians directly addresses economic issues such as productivity, employability, and mobility. Without proper access to eye health and vision care services, many Canadians fall short of their earning and educational potential.

A January 2023 Abacus Data poll demonstrated that 67% of Canadians supported an increased role of the Federal Government in eye health and vision care. Furthermore, 76-77% of Canadians supported the notion of a federal eye health strategy which would identify training, education and guidance needs of healthcare professionals responsible for eye health; ensure Health Canada could rapidly consider new applications for treatments and devices used to treat eye conditions; promote research and improve data collection on eye disease prevention and treatment; identify specific strategies on how to enhance eye care access for vulnerable populations including Indigenous peoples, children and seniors; and promote information and knowledge sharing between the federal and provincial governments in relation to eye disease and prevention.¹

Recommendation 1: That the Government of Canada prioritizes the vision health of all Canadians through the investment in a National Vision Strategy through the Public Health Agency of Canada, under the leadership of a Chief Vision Officer.

Optometrists across the country maintain that the federal government currently has a tremendous opportunity to act through the investment of a National Strategy on Eye Health and Vision Care under the auspices of the Public Health Agency of Canada. CAO has identified that a national strategy would address the need for an evidence-based strategy supported by a vision desk, the need for increased investments for real made in Canada research, a stronger



system that would ensure more consistent and reliable medications to treat and diagnose eye disease and conditions, enhanced access to services for rural, remote and Indigenous populations, and funding for a national public awareness campaign which would serve to educate and inform Canadians on the importance of eye health and vision care.

Drawing from existing national strategies wherein the Public Health Agency of Canada has established specific professional, disease and conditions branches known as “Desks”, CAO proposes working within PHAC’s existing frameworks and identified mandates, that in its first year of inception, a Chief Vision Officer (CVO) hailing from within the eye health professional community, is appointed to lead and develop vision policy at the federal level. In consultation with portfolio members, the CVO would endeavor to formalize a mandate and provide details about the expectations for the Desk’s core functions; the CVO would develop a plan that clearly defines its roles, priorities, and milestones; the CVO would further develop a comprehensive communications plan to enhance internal awareness of the Vision Desk within the federal health portfolio, and to present a clear Vision Desk mandate to external stakeholders. Addressing these administrative details early in the process will play an integral role in the creation and development of a national vision strategy.

Recommendation 2: That the Government of Canada prioritizes the improvement of access to vision care for Canada’s Indigenous communities.

In our efforts to support our members working with Indigenous populations throughout Canada, CAO has identified one major hindrance which points to the excessive administrative burden built into the NIHB vision care offering. These overbearing inconveniences all too often dissuade optometrists from providing services to remote communities. Antiquated compensation schedules and service lists that do not include several basic technology-based components of a comprehensive eye exam, such as OCT scans and retinal imaging, require urgent attention and ultimately due diligence for consideration and implementation.

Optometrists are prepared to co-develop a distinctions-based Indigenous eye health and vision care framework to ensure Indigenous people can receive these services in or near their own communities.

A comprehensive framework would address the individual needs of each specific population demographic with regards to eye health and vision care and would help to better address and amplify the resources required for more comprehensive disease prevention and management, health promotion and support for the health care communities servicing these Canadians.



Recommendation 3: That the Government of Canada actively engage in funding much needed eye health and vision care research, which would address the specific needs of Canadians.

There is a dearth of high-quality, reliable population health research on vision health in Canada. To fill these gaps, CAO relies on estimates, data from other countries, and privately commissioned polls. To properly address the extent of the eye health crisis across Canada, thorough and high-quality research is required to help guide future actions and spending priorities.

Past efforts to gather made in Canada vision health data have included the work of the National Coalition for Vision Health (NCVH), a not-for-profit organization of associations that collectively shared a common interest in eye care and vision research. This robust study, released in September 2008, was funded, and executed in conjunction with Health Canada. The members of the Coalition were comprised of a wide array of vision health professionals and researchers as well as the Canadian Institutes of Health Research.

A privately commissioned study conducted by Deloitte Access Health Economics, found that incredibly, the total cost of productivity losses for Vision Loss was estimated to be \$4.3 billion in 2019, or \$3,535 per person with Vision Loss. The largest component of productivity losses was reduced employment (\$3.2 billion) followed by presenteeism (\$380.6 million) and absenteeism (\$318.9 million). Incredibly, in 2019, the total direct healthcare system costs attributed to Vision Loss in Canada were estimated to be \$9.5 billion.²

Additional available data showcases the vast impact of the cost of vision loss across the economy:

- Increased rates of injury and physical trauma (e.g., falls) and motor vehicle accidents, particularly for older adults.³
- 90% of vision loss costs are *non-eye related medical cost*⁴ (i.e., everything from palliative care to occupational therapy)
- Vision loss is more common among *new immigrants* than the Canadian-born population⁵
- 34% of Indigenous persons with *diabetes* indicate the disease affected their vision⁶
- There are more than 2000 *eye injuries* a day in Canada⁷
- People with vision loss are at greater risk of *social isolation* and reduced *community participation*⁸



- People with vision loss have more *complex needs and comorbidities* (e.g., diabetes, hypertension, physical and cognitive disabilities)⁹

Research suggests that 1 in 3 Canadian adults have not sought vision care or purchased corrective lenses due to cost.¹⁰ Eye health professionals see an alarming rate of unattended eye disease and conditions every day in their practices, these include glaucoma, cataract, diabetic retinopathy, and age-related macular degeneration. Optometrists know that not only can these financial consequences to the patient and the system be reduced, but that more notably is that 90% of vision loss is preventable or treatable through proper preventative measures such as comprehensive eye exams.¹¹

There is an urgent need for a comprehensive review of the *Environmental Scan of Vision Health and Vision Loss in the Provinces and Territories of Canada* research to better identify and address gaps in vision health and eye care.

In closing, Canadian optometrists applaud this government's efforts towards economic stability, and we welcome the opportunity to contribute to a solution. CAO would be pleased to present our recommendations in person to the House of Commons Standing Committee on Finance when the Pre Budget hearings take place. We would welcome the opportunity to provide details on the many ways in which the CAO can support the government with the implementation of a National Strategy on Eye Health and Vision Care at PHAC, address the barriers to access for Indigenous populations, children and seniors, as well as provide valuable details on the tangible need for increased research funding in eye disease and conditions in order to ensure better informed eye health outcomes for all Canadians.

The Canadian Association of Optometrists (CAO) is the national voice of optometry. Optometrists are independent primary health care providers and represent the front line of vision health. Optometrists practice in a range of settings: most work in private practice, others work in clinics, hospitals, community health centres, corporate optometry, research, teaching and administration. Recognized at home and internationally as a leading advocate for the profession, CAO is dedicated to providing leadership and support to its +7,900 members (Optometrists, Students and Optometric Assistants) to enhance the delivery of healthy eyes and clear vision for all Canadians. For more information, visit www.opto.ca.



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