

October 15, 2026

Centers for Disease Control and Prevention
National Center for Health Statistics
Re: National Health Interview Survey—2028 Redesign
Docket No. CDC-2026-1387
OMB Control No. 0920-0214

Dear Sir or Madam:

The International Chiropractors Association (ICA) appreciates the opportunity to comment on the planned redesign of the National Health Interview Survey. The ICA strongly supports retaining the complete nine-question Whole Person Health Index as permanent core content in the redesigned 2028 Adult Questionnaire and in subsequent administrations of the NHIS. The ICA represents doctors of chiropractic who provide patient-centered, nonpharmacologic health care in communities throughout the United States and internationally. Chiropractors frequently care for people whose health concerns affect mobility, physical activity, sleep, stress, daily function, work, family responsibilities, and overall quality of life. Consequently, our members see every day that health cannot be adequately understood solely through diagnoses, disease prevalence, procedures, medication use, or health care expenditures.

The Whole Person Health Index would provide substantial practical utility by capturing dimensions of health that matter directly to individuals. Its nine questions address general health, quality of life, social and family connections, diet, physical activity, stress management, sleep, meaning and purpose, and the ability to manage one's health. These domains provide a more complete picture of how Americans are actually living and functioning.

Traditional health surveillance remains essential, but it often concentrates on the presence or absence of disease. That approach may not identify meaningful differences between individuals who have the same diagnosis but markedly different levels of function, resilience, participation, or well-being. Conversely, an individual may experience a decline in sleep, physical activity, stress management, social connection, or quality of life before that decline is reflected in a new diagnosis. The Whole Person Health Index can help fill this important measurement gap.

Permanent inclusion of the Index would:

1. Establish a consistent national baseline for whole-person health and well-being;
2. Allow CDC, policymakers, clinicians, researchers, and communities to monitor changes in functional health and quality of life over time;
3. Support evaluation of public health, preventive, lifestyle, complementary, integrative, and nonpharmacologic health initiatives that may affect several health domains simultaneously;
4. Help identify disparities among geographic, demographic, socioeconomic, disability, and health-status populations;
5. Provide a common measurement framework that can be used across public health surveillance, clinical research, and health care; and



6. Keep the individual's own assessment of what matters most to his or her health at the center of national health measurement.

The Index is particularly relevant to evaluating whole-person and whole-person-care initiatives. Many interventions are intended to improve an individual's ability to function, remain active, manage health concerns, participate in family and community life, and achieve a better quality of life. If national surveys measure only diagnoses and utilization, important benefits—or declines—may remain invisible.

The ICA also believes the Whole Person Health Index provides a favorable balance between information value and respondent burden. The Index obtains information across nine important domains through a brief, uniform set of questions with consistent response options. Replacing these questions with multiple independent instruments would likely require substantially more time and create greater complexity. The Index therefore supports the Paperwork Reduction Act objective of maximizing practical utility while minimizing burden.

To preserve the Index's validity and usefulness, the ICA recommends that CDC:

- Retain all nine questions as a unified set rather than selecting isolated items;
- Include the questions as permanent annual core content rather than content dependent on temporary sponsorship or periodic rotation;
- Preserve consistent question wording and response options to support national trend measurement;
- Test the questions across online, paper, telephone, and interviewer-administered modes to identify and minimize mode effects;
- Publish a clear and uniform scoring methodology, including an unambiguous explanation of whether higher or lower composite scores represent better health;
- Make both item-level responses and the composite score available in public-use data, subject to appropriate privacy protections;
- Permit analysis of the results alongside measures of chronic conditions, pain, disability, functional status, health care utilization, complementary and integrative health use, insurance coverage, and access to care; and
- Continue evaluating the Index across diverse populations, including rural communities, older adults, people with disabilities, and individuals with chronic musculoskeletal conditions.

The Whole Person Health Index should complement—not replace—established measures of disease, disability, functional limitation, and access to care. Its distinctive value is that it adds the individual's perspective and measures health domains that conventional disease-specific questions do not fully capture.

The NHIS is one of the nation's most important sources of health information. Its redesign presents an opportunity to move national health surveillance beyond a narrow accounting of illness and toward a more complete understanding of health, function, resilience, and quality of life. If the federal government is to advance whole-person health and whole-person care, it must have a consistent national instrument capable of measuring those concepts.



For these reasons, the International Chiropractors Association strongly recommends that CDC retain the complete nine-question Whole Person Health Index as permanent annual core content in the redesigned NHIS Adult Questionnaire.

Thank you for considering the perspective of the chiropractic profession and the patients and communities our members serve.

Respectfully submitted,

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