

April 18, 2022

Dear Members of the Veterans Affairs Department,

The American Tinnitus Association (ATA) appreciates the opportunity to comment on the Veterans Administration proposed rule, Schedule for Rating Disabilities Docket Number VA-2022-VBA-0009 (February 15, 2022).

On scientific and ethical grounds, the ATA strongly opposes the VA proposed rule that would eliminate tinnitus as a stand-alone disability by linking it to hearing loss for purposes of disability benefits. The proposal would deny benefits to Veterans who have tinnitus unless they have hearing loss that is not compensable. Veterans with tinnitus and compensable hearing loss would not receive benefits for their tinnitus.

This proposed change would effectively diminish tinnitus as an independent condition, which is debilitating – separate from hearing loss – for millions of people, while substantially reducing the future number of Veterans with tinnitus eligible for benefits. Over time, the proposed change would lower VA numbers for tinnitus as a disability, without meaningfully addressing the needs of Veterans suffering with tinnitus, which continues to grow.

Because the proposed change does not reflect current scientific understanding of the condition and research (<https://pubmed.ncbi.nlm.nih.gov/27995315/>), it appears to be a blatant attempt to reduce costs at the expense of our Veterans with tinnitus who depend on and deserve disability benefits.

As of 2020, more than 2,325,000 Veterans received service-connected disability for tinnitus, making it the leading disability, followed by hearing loss. Tinnitus often occurs independently of any other health condition (<https://www.nidcd.nih.gov/health/tinnitus>), i.e. it is not necessary to have hearing loss to have tinnitus. We also know that tinnitus is very common among Veterans because of the hazards experienced during military service, including chemical exposure from burn pits, blasts, traumatic brain injuries, post-traumatic stress syndrome, and noise exposures.

Research makes it abundantly clear that tinnitus and hearing loss do not go hand in hand, as is illustrated in a major research study that focused on tinnitus (<https://pubmed.ncbi.nlm.nih.gov/33974792/>), published in 2021, by the VA Rehabilitation Research & Development National Center for Rehabilitative Auditory Research. Analyzing 690 Veterans and service members, the study found that 53% of the sample had tinnitus but a substantially lower number had hearing loss. Prospective studies have also been conducted that verify the debilitating effects of tinnitus on daily life for Veterans: sleep disturbance,

concentration, anxiety, and depression. Moreover, we know that severe tinnitus can and does result in suicide; that is not a hearing loss issue.

As a nonprofit advocating for the interests of the 10–15% of the U.S. population that experiences tinnitus, we recognize that hearing loss can play a role in tinnitus and its management. However, treating hearing loss does not remedy the negative impacts of tinnitus. As noted in the comment (<https://www.regulations.gov/comment/VA-2022-VBA-0009-1614>) from a Veteran liaison in the U.S. Senate: “As a Veteran who [also] suffers with tinnitus, I can tell you that it can be maddening at times, and causes insomnia, difficulty with concentration, hearing, and the fact that it never goes away is difficult to handle at times. No cure, it’s always there, it’s unstoppable.”

It is imperative to note that VA hospitals do not currently have adequate tinnitus clinical services available, which means Veterans need to get services elsewhere, or they languish without appropriate care and support.

There is valuable ongoing Federal, state and private research into the causes of tinnitus and potential cures. Tinnitus must continue to be a stand-alone disability so that research for cures and better treatments can continue based on accurate data about the number of Veterans suffering with tinnitus. By arbitrarily linking tinnitus to hearing loss disability, the number of tinnitus sufferers eligible for disability benefits would drop even though the problem remains. That is akin to deliberately sweeping a significant problem stemming from military service under the rug.

Again, from a scientific and ethical standpoint, it is wrong to categorize tinnitus within a hearing loss disability. The American Tinnitus Association strongly urges you to continue tinnitus as a stand-alone disability. Our Veterans deserve no less.

Sincerely,



David Hadley
Chair, Board of Directors
American Tinnitus Association



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