



**AMERICAN ACADEMY OF  
OTOLARYNGOLOGY—  
HEAD AND NECK SURGERY**

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April 27, 2016

The Honorable Dan Benishek, MD  
U.S. House of Representatives  
514 Cannon House Office Building  
Washington, DC 20515

Dear Chairman Benishek:

On behalf of the American Academy of Otolaryngology–Head and Neck Surgery (AAO-HNS), thank you for your interest in, and dedication to, ensuring access to hearing health services for our nation’s veteran population.

As you are aware, the AAO-HNS is the national medical specialty society for physicians dedicated to the care of patients with disorders of the ears, nose, throat (ENT), and related structures of the head and neck. Our approximately 12,000 members are specifically trained to provide hearing-impaired patients with a full medical evaluation, diagnosis, and treatment for their hearing disorders. Given the specialization of our members, the AAO-HNS closely monitors various pieces of legislation pertaining to the delivery of hearing healthcare services, including H.R. 353, the Veterans’ Access to Hearing Health Act.

We strongly support the study and analysis of existing VA programs to ensure appropriate access by veterans to quality hearing healthcare services. We view a physician-led, team-based care approach as the best means for delivering hearing health services to all populations, and it is our hope that the study included in H.R. 353 will advance this concept.

It has come to our attention that H.R. 353 is scheduled for mark-up by your Veterans’ Affairs Subcommittee on Health on April 29, 2016. We have reviewed the proposed “amendment in the nature of a substitute” dated April 26, 2016 (1:40 p.m.) and have identified a few concerns with the revised language included in Section (2)(b). These concerns have been shared with your staff and are detailed below:

**Suggested Revision:**

Page 2, Line 3:

Strike “Such updates shall include—” and insert “Such updates shall be limited to—”.

**Explanation:** Given the VA’s unilateral revisions included in a recently updated version of its nursing handbook, the AAO-HNS urges lawmakers to ensure any updates to the “VHA Audiology and Speech-Language Pathology Services” handbook provisions are specifically limited to the Congressional intent enumerated in Section (2)(b) of H.R. 353, as amended.

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**Suggested Revision:**

Page 2, Lines 12-14:

Strike “provided as part of the treatment plan developed by an audiologist;” and insert “provided as part of the medical plan developed by a physician and the non-medical aural rehabilitation treatment plan developed by an audiologist;”.

Note: While this is our preferred language, the AAO-HNS would suggest the following as an alternative – “provided as part of the non-medical aural rehabilitation treatment plan developed by an audiologist;”.

**Explanation:** To ensure our veterans’ hearing healthcare involves a physician and a medical evaluation, the AAO-HNS urges lawmakers to clarify the medical and non-medical roles in the development of a patient’s treatment plan. This is particularly important since recent testimony by a VA representative indicated the implementation of policies eliminating the initial primary care physician visit for audiology and optometry services.

The AAO-HNS appreciates your thoughtful attention to the above-mentioned concerns. It is our understanding that due to time constraints such changes cannot be incorporated prior to the Subcommittee mark-up on April 29, but will be considered prior to any Full Committee markup. As noted in our support letter of H.R. 353 dated June 23, 2015, the AAO-HNS “may reevaluate our position if H.R. 353 is amended in such a way that high-quality (and safe) hearing healthcare is jeopardized.” At this time, the AAO-HNS is temporarily withdrawing its support of H.R. 353 with the hope that the above-mentioned concerns will be addressed in the near future.

Again, we thank you for your efforts on behalf of America’s veterans, as well as your staff’s efforts to engage all relevant stakeholders. We look forward to working with you as H.R. 353 moves forward through the Committee process. If you and your staff have any questions, please contact the AAO-HNS Legislative Advocacy team at [legfederal@entnet.org](mailto:legfederal@entnet.org).

Sincerely,

James C. Denny III, MD, FACS  
Executive Vice President and CEO